



May 18, 2023

Juliana Pearson  
PRA Coordinator, Strategic Collections and Clearance  
Governance and Strategy Division  
Office of Chief Data Officer  
Office of Planning, Evaluation and Policy Development  
U.S. Department of Education  
400 Maryland Ave. SW  
Washington, DC 20024

***In re: Agency Information Collection Activities; Submission to the Office of Management and Budget for Review and Approval; Comment Request; National Evaluation of Career and Technical Education Under Perkins V [Docket No.: ED–2022–SCC–0156]***

Dear Juliana Pearson,

On behalf of Advance CTE, the nation’s longest-standing not-for-profit that represents State Directors and leaders responsible for secondary, postsecondary and adult Career Technical Education (CTE) across all 50 states and U.S. territories, and the Association for Career and Technical Education (ACTE), the nation’s largest not-for-profit association committed to the advancement of education that prepares youth and adults for career success, we are writing to provide input on the final draft surveys proposed as part of the National Evaluation of Career and Technical Education under Perkins V, as outlined in Federal Register Notice 2023-08490, Docket No. ED–2022–SCC–0156.

The National Evaluation of CTE is an important element of Perkins V that can help policymakers and practitioners understand CTE policy and program implementation around the country and identify areas for improvement. We support IES’ efforts to design these surveys to be informative to both policymakers and the public while ensuring the surveys are easily navigable for respondents. We also appreciate the integration of previous feedback provided by our organizations on prior proposed drafts of these survey instruments. This has led to marked improvements in the surveys, including:

- Improved organization of questions within surveys;
- Greater consistency of terminology within and across surveys;
- Enhanced clarity to help respondents differentiate between programs and activities funded with Perkins and those funded by other sources;
- Additional response options that ask about important CTE program elements such as industry credentials and CTSOs; and
- More clarity for questions about needs assessments and the use of labor market information.

Despite these improvements, we continue to recommend that IES further reduce the burden of these surveys for respondents, particularly for the local education agency (LEA) survey. While these latest versions are more streamlined than prior drafts, there are several remaining questions that are unlikely



to yield actionable responses. This includes questions that ask about activities that virtually all respondents are required to do under Perkins or for state funding, as well as questions that provide little information absent follow-up questions, which increase rather than reduce the survey burden and may lead to a diminished response rate. We would be happy to provide more detailed feedback about specific survey items if needed.

Thank you again for the opportunity to comment on this critically important data collection. If you need additional information, please do not hesitate to contact ACTE Senior Director of Public Policy Dr. Alisha Hyslop at [ahyslop@acteonline.org](mailto:ahyslop@acteonline.org) or Advance CTE Executive Director Kimberly Green at [kgreen@careertech.org](mailto:kgreen@careertech.org).

Sincerely,

LeAnn Curry  
Executive Director  
ACTE

Kimberly Green  
Executive Director  
Advance CTE