

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Perkins Consolidated Annual Report (OMB Control Number 1830-0569)

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

This is a request to renew and revise the information collection used by the U.S. Department of Education (Department) to gather annual reports from eligible agencies under the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins V) (20 U.S.C. 2301 et seq.), the Consolidated Annual Report (CAR). Annual reports consist of narrative information, financial status reports (FSRs), and performance data pursuant to section 113 of Perkins V, applicable Federal regulations pursuant to the Uniform Guidance (2 CFR 200), and Education Department General Administrative Regulations (34 CFR 76). Eligible agencies are the State boards, responsible for the administration of career and technical education in the 50 States; the District of Columbia; Puerto Rico; the outlying areas of the United States Virgin Islands, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands; and the Republic of Palau. With few exceptions, the State Boards delegate to another State agency responsibilities that involve the administration, operation, or supervision of its State Plan, including the development and submission of the annual report.

Section 113(b)(3)(C) of Perkins V requires each eligible agency that receives an allotment under section 111 to annually prepare and submit to the Secretary a report regarding—

- the progress of the State in achieving the State determined levels of performance on the core indicators of performance described in section 113(b)(2) of the Act.
- the actual levels of performance for all career and technical education (CTE) concentrators, and for each of the subgroups of students, as described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48) of Perkins V.

Each eligible agency also must disaggregate data for each of the core indicators for the subgroups of students, as described in ESEA section 1111(h)(1)(C)(ii), and special populations, as described in section 3(48) of Perkins, that are served under Perkins V; and by the CTE programs or programs of study of the CTE concentrators, except that in a case in which reporting by such program or program of study is impractical, the data may be disaggregated by the career clusters of the CTE concentrators, if appropriate.

As a recipient of Federal funds, each eligible agency must comply with the requirements for submitting annual performance reports to the Department pursuant to 2 CFR 200.328, including a comparison of actual accomplishments to the objectives of the Federal award and, if applicable, the reasons why established goals were not met.

Finally, as a recipient of Federal funds, each eligible agency must comply with the requirements for submitting annual financial reports to the Department pursuant to 2 CFR 200.327. To meet these requirements, an eligible agency must complete two separate forms, an interim FSR and a final FSR, each containing the same items. The interim FSR covers the first 12 and/or 15-month period for which the grant was awarded, while the final FSR covers the entire 27-month period for which the grant was awarded.

The Department has combined these reports into a single reporting instrument, the Consolidated Annual Report (CAR). Each eligible agency will submit its narrative performance report, FSRs, and performance data forms for the core indicators to the Perkins Consolidated Annual Report (CAR) Portal at <https://Perkins.ed.gov>. The deadline for each eligible agency's CAR submission is January 31 of the year following the most recently completed program year.

This request to renew and revise the information collection used by the U.S. Department of Education to gather annual reports from eligible agencies under Perkins V contains the following proposed changes that would be implemented in the 2026-27 reporting year:

- **Our proposal would add a narrative question that asks States to describe the policies and procedures they use to identify CTE concentrators and the strategies they use to validate the identification of CTE concentrators to ensure that all CTE concentrators are included in statutorily required performance reporting.** Recent research documented that one State's method of identifying CTE concentrators resulted in systematic errors that inadvertently excluded more than 10 percent of CTE concentrators whose outcomes should have been reported to the Department. The CTE concentrators who were more likely to be misidentified as non-concentrators included CTE concentrators who were English learners, those who were eligible for free and reduced-price lunches, and those who had an Individualized Education Plan.¹ The Department needs greater information about how States identify CTE concentrators and how they validate the identification of these students to understand the extent to which technical assistance may be needed. We are requesting this information in the CAR, rather than Perkins V State Plan, because we anticipate that this information could change significantly over time as State methods for identifying and validating CTE concentrators evolve and improve.
- **Our proposal would seek data from States on CTE participants in the "middle grades."** Perkins IV, the predecessor statute, barred the use of program funds to serve students prior to grade 7. The Perkins V reauthorization revised this prohibition by barring the use of funds to serve students prior to the "middle grades," defining the term "middle grades" by cross-referencing the definition in the Elementary and Secondary Education Act of 1965 (ESEA), which is grades 5 through 8. Since the law was changed in 2018, there has been great interest among States and CTE decision-makers in serving students in the "middle grades" with Perkins V funds,² but the Department has little information on the extent to which States and subrecipients are using

¹ Huang, Yue, Hojung Lee, Arielle Lentz, and Kenneth A. Shores. (2023). *Misclassification of Career and Technical Education Concentrators: Analysis and Policy Recommendations*. (EdWorkingPaper: 23-889). Retrieved from: <https://doi.org/10.26300/esab-m159>.

² See, for example, Advance CTE and the Association for Career and Technical Education (2020), *Broadening the Path: Design Principles for Middle Grades CTE*. Retrieved from: <https://careertech.org/resource/broadening-the-path-design-principles-for-middle-grades-cte/>.

funds to serve this group of students. To address this information gap, our proposal would have States begin collecting and reporting data on the number of CTE participants in grades 5 through 8, to the extent such data are available. Also, to the extent these data are available, we would request that States disaggregate these participation data by race, ethnicity, gender, and applicable special population status.³ These are the same subgroups for which States disaggregate CTE concentrator performance data pursuant to section 113(b)(3)(C)(ii)(I)(aa) of Perkins V and the numbers of secondary and postsecondary CTE concentrators and participants enrolled during the reporting year. We do not propose to ask States to disaggregate data on participants in the middle grades by Career Cluster, as we currently do with data on CTE participants and CTE concentrators at the high school and postsecondary levels.

- **We propose to eliminate the requirement that eligible agencies provide the numerators and denominators they used to calculate State performance on the core indicators of performance.** The Department would instead pre-populate for States the data specifications that we are identifying in the Perkins V State plan information collection request (OMB Control Number 1830-0029). As described in more detail in the supporting statement for the revision of 1830-0029, providing the core indicator numerators and denominators for States would: (1) ensure that States measure the indicators in a manner that is consistent with the statute; (2) reduce the collection of potentially duplicative information consistent with section 113(b)(3)(C)(iii) of the law; (3) promote the collection of more accurate and complete data on the post-program outcomes of CTE concentrators by giving States more time to collect and accurately report these data; and (4) improve the consistency of the data collected from States to facilitate the “aggregate analysis” of performance and State-by-State comparisons that sections 113(b)(3)(C)(iv) and 114(a)(1) of the law, respectively, direct the Department to produce. In addition these data specifications would improve the ability of States to meet the requirements of section 113(b)(3)(A)(i)(III)(dd) of Perkins V, which directs States, in establishing their State-determined performance levels, to “take into account how the levels of performance involved compare with the State levels of performance established for other States, considering factors including the characteristics of actual (as opposed to anticipated) CTE concentrators when the CTE concentrators entered the program, and the services or instruction to be provided.”
- **To the extent these data are available, our proposal would begin asking States to disaggregate the education and employment outcomes of secondary CTE concentrators who have exited secondary education (3S1) and postsecondary CTE concentrators who have completed a program (1P1) by placement type.** Section 113(b)(3)(C)(ii)(III) of Perkins V directs States to disaggregate post-program outcome data “to the extent such data is available” by postsecondary award level; advanced training; military, national, and community service; and employment, including those individuals who are employed in a high-skill, high-wage, or in-demand sector or occupation. Consequently, we propose to implement this requirement by requesting data, to the extent it is available in the State, on the percentages of secondary exiters and postsecondary

³ We would not ask States to disaggregate participation data for certain special population subgroups who are typically not enrolled in the middle grades. These subgroups are individuals preparing for non-traditional fields; single parents, including single pregnant women; and out-of-workforce individuals.

completers who enrolled in postsecondary education or “advanced training” by the type of postsecondary education program in which they enrolled (certificate, associate degree, or baccalaureate degree programs) and the type of advanced training in which they enrolled (Registered Apprenticeship, pre-apprenticeship programs, certification or licensure programs offered at an adult technical center, or other types of advanced training identified by the State). States would also be asked to identify the percentages of secondary exiters and postsecondary completers who enlisted in military service, enrolled in a national or community service program, and were employed.

States would also be asked to disaggregate employment placement data to identify the number of secondary exiters and postsecondary completers who are employed in “high-skill sectors and occupations” and “high-wage sectors and occupations,” as those terms are defined by eligible agencies in their State plans. Such disaggregated outcome data would be helpful to decision-makers at all levels of government in better understanding and improving the quality and effectiveness of CTE programs at the secondary and postsecondary levels. Knowing the types of postsecondary credentials and “advanced training” that exiting and completing CTE concentrators are pursuing will shed light on the extent to which CTE programs are aligned with and preparing students for different post-program opportunities. We also believe knowing the extent to which CTE concentrators are placed in “high-skill sectors and occupations” and “high-wage sectors and occupations” would be helpful to States and policymakers in understanding the degree to which CTE programs are preparing students for these opportunities. To the extent these data are available to States, we want to begin collecting and reporting them to Congress and the public.

In addition, we are proposing to modify the CAR to add narrative questions that we had originally proposed to include in the Perkins V State Plan Guide (1830-0029) that was published for public comment at the same time as this ICR. Many commenters on the proposed State Plan Guide expressed concern that addressing these questions would require States to develop a new State Plan, which they described as burdensome because of the law’s extensive stakeholder and public participation requirements for the development of a new State Plan. Moving these narrative items from the State Plan Guide to the CAR ICR addresses these concerns because their inclusion in the CAR would not require the development of a new State Plan to address them. The proposed narrative items provide important information around how States are utilizing their Federal funds. Specifically, these items help to describe the data that States report and how States operationalize different requirements of the law. By including these items in the CAR ICR, this action allows States to update this information annually as needed. Providing this information in the CAR ICR also allows the Department to collect information that is necessary to inform implementation, better support States, and focus technical assistance. As proposed, States would maintain flexibility to engage in stakeholder consultation as they choose, including through the robust levels of engagement they may go through in updating their State Plan, but they are no longer required to pursue that level of engagement for the proposed narrative items. The narrative items that would be moved from the State Plan Guide and the CAR ICR, which would become effective for the 2026-27 reporting year, are described below.

- **We are proposing to add a narrative question that asks States to describe their policies for the use of Perkins V funds to serve students in the “middle grades” (II.B.4).** Perkins IV, the predecessor statute, barred the use of program funds to serve students prior to grade 7. The Perkins V reauthorization revised this prohibition by barring the use of funds to serve students prior to the “middle grades,” defining the term “middle grades” by cross-referencing the definition in the Elementary and Secondary Education Act of 1965 (ESEA), which is grades 5 through 8. Since the law was changed in 2018, there has been great interest among States and CTE decision-makers in serving students in the “middle grades” with Perkins V funds,⁴ but the Department has little information on State policies on the use of Perkins V to serve “middle grades” and the extent to which States and subrecipients are using funds to serve this group of students. We are proposing to begin collecting data on States’ “middle grades” policies, to the extent such data is available.
- **We are proposing to add a narrative question that asks States to describe their definitions for “size,” “scope,” and “quality” separately for secondary and postsecondary education, or a description of their implementation of these terms related to programs funded under sections 131 and 132 (II.B.6).** The Perkins V statute uses the terms “size, scope, and quality” throughout the law. For example, section 134(c)(2)(B) of Perkins V requires the comprehensive local needs assessment carried out by each eligible recipient to include a description of how the CTE programs it offers are “sufficient in size, scope, and quality to meet the needs of all students served by the eligible recipient.” Section 135(b) of Perkins V limits the use of grant funds by eligible recipients to CTE programs that are “of sufficient size, scope, and quality to be effective.” The State Plan Guide currently asks States to provide the descriptions of “size, scope, and quality” that they will use to evaluate whether a CTE program is “of sufficient size, scope, and quality.” We are proposing to maintain the previous question in the State plan guide and ask States through the CAR ICR collection to address the question separately for secondary and postsecondary education programs, providing a description of “sufficient size, scope, and quality” that they will use to evaluate secondary programs and one that they will use to evaluate postsecondary programs. We are proposing to make this change because we found in our review of State plans that some States did not provide descriptions that were applicable to both secondary and postsecondary programs. For example, 26 States included information on CTE program “size” at the secondary level but did not address “size” at the postsecondary level. Similarly, 8 States included information about how they evaluate CTE program “scope” at the secondary level but did not include any information about how they evaluate scope at the postsecondary level. Asking for separate descriptions, one for secondary education and another for postsecondary education, is intended to ensure that States address both levels of education in their descriptions of “size, scope, and quality.”
- **We are proposing to add a narrative question that asks States to provide the definitions they use for “high-skill” and “high-wage” occupations or industries or a description of their implementation of these terms and to describe how these occupations or industries are**

⁴ See, for example, Advance CTE and the Association for Career and Technical Education (2020), *Broadening the Path: Design Principles for Middle Grades CTE*. Retrieved from: <https://careertech.org/resource/broadening-the-path-design-principles-for-middle-grades-cte/>.

presented to eligible recipients (II.B.7). The phrase “high-skill, high-wage, or in-demand occupations or industries” is used throughout Perkins V. While the law defines the term “in-demand occupations or industries” using the definition in section 3 of the Workforce Innovation and Opportunity Act, it does not define “high-skill” or “high-wage.” Given the extensive use of these terms in Perkins V the Department needs information on how States have defined them in their implementation of the program for oversight purposes. For example, section 122(d)(9)(C) of the law requires the eligible agency to describe in the State plan how it will “prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations” and section 134(b)(5)(A) of Perkins V requires each eligible recipient to describe in its application how they will “provide activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency.”

- **We are proposing to add two narrative questions on any “industry-recognized certificates or certifications” that States count in their calculation of two of the Perkins V core indicators for secondary (II.B.5.a) and postsecondary students (II.B.5.b).** Perkins V defines the term “recognized postsecondary credential” using the definition from section 3 of the Workforce Innovation and Opportunity Act, which is “a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.” The term “industry-recognized” is not further defined. We are proposing to ask those respondents that count “industry-recognized certificate or certifications” in their collection of data on secondary and postsecondary CTE concentrator attainment of a recognized postsecondary credential (5S1 and 2P1) to briefly describe how they determine that these credentials are “industry-recognized.” The Department needs this information to understand States’ needs for technical assistance and guidance in assessing the extent to which a credential is recognized by industry.
 - **We are proposing to add narrative questions concerning the implementation of the secondary quality indicators that measure the attainment of postsecondary credits (5S2) (II.B.5.c) and participation in work-based learning (5S3) (II.B.5.d) for those States using these indicators.** We propose to ask States to specify the number of postsecondary credits a secondary CTE concentrator graduate must earn to be counted in the numerator of 5S2 and the number of work-based learning hours or credits (or other units of measurement used by the State) a secondary CTE concentrator graduate must complete to be counted in the numerator of 5S3. The Department does not have comprehensive information about the credit or hour thresholds that all States are using for these indicators and needs these data to clearly and accurately describe how States are measuring these indicators in its production of the “State-by-State comparisons” required by section 113(b)(3)(C)(iv) of the law.
- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information gathered through this package would be used in a variety of ways. First, narrative and financial information are reviewed by the Office of Career and Technical Adult Education (OCTAE), Division of Academic and Technical Education (DATE) to determine each eligible agency's compliance with provisions of Perkins V and applicable Federal regulations as noted above. For example, eligible agencies are required to implement specific leadership activities in their State, as well as identify and quantify any disparities or gaps in performance on State determined performance levels between any disaggregated category of students and all CTE concentrators served by the eligible agency.

Second, DATE staff review performance data to determine whether, and to what extent, each eligible agency has met its State determined performance levels for the core indicators described in section 113(b)(2) of Perkins V. An eligible agency that did not meet at least 90 percent of the State determined performance levels for any of the core indicators described in section 113(b)(2) of Perkins V is required to develop and submit, as part of its CAR report, a program improvement plan with special consideration to the performance gaps identified under section 113(b)(3)(C)(ii)(II) of Perkins V. The improvement plan must address each core indicator that a State failed to meet; disaggregated categories of students for which there were quantifiable disparities or gaps in performance compared to all students or any other category of students; steps that will be implemented, beginning in the current program year; staff members who are responsible for each action step; and the timeline for completing each action step. DATE staff will review these plans to determine whether they are thorough and appropriate in addressing each indicator that was not met at the 90 percent level.

Third, Perkins V section 113(b)(3)(C)(iv)(III) requires the Secretary to provide the appropriate committees of Congress copies of annual reports received by the Department from each eligible agency that receives funds under the Act. Section 113(b)(3)(C)(iv)(I) further requires the Secretary to make the information contained in such reports available to the general public. To meet this obligation, DATE compiles the CAR data into an annual report to Congress and makes the data available to the public online through the Peer Collaborative Resource Network (PCRN) at <http://cte.ed.gov>.

Fiscal data collected through the CAR also would continue to be provided to the Institute of Education Sciences for analysis and use in the National Evaluation of Career and Technical Education under Perkins V.

Finally, DATE staff uses annual CAR information to determine which States will be monitored for an upcoming year or which States could benefit from technical assistance in particular areas. Annual CAR review results help in the identification of topics for annual Data Quality Institutes that DATE sponsors for eligible agencies, as well as the decision to offer customized technical assistance to States on accountability issues. This strategy has been well-received by the States and is deemed effective by our office in improving the reliability and validity of the Perkins data.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using**

technology (e.g. using an electronic form, system or website from paper), please explain in number 12.

Each eligible agency submits its report electronically via the Perkins CAR Portal (<https://perkins.ed.gov/>). This website allows an eligible agency to complete its reports using Web-based forms and to certify to the accuracy and completeness of its submission using electronic Personal Identification Numbers (PINs). It is important to note that the use of the PINs to certify and sign the CAR and FSRs is the same as certifying the documents with a hand-written signature by the State official. State officials are responsible for protecting the confidentiality of their PIN and for any use of their PIN by another individual.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This is a unique collection; there are no similar data collections which seek this information.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

This collection does not impact small businesses or other small entities.

- 6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Without the information gathered through the CAR, the Department would be unable to determine whether, and to what extent, States were complying with the Perkins V statute and applicable Federal regulations. Moreover, the Department would be unable to sufficiently review each State's progress in meeting its performance levels and determine its own effectiveness in helping eligible agencies achieve the purposes of the Act. The Department also would be unable to comply with a statutory directive to report State performance data to the Congress and the public.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- requiring respondents to report information to the agency more often than quarterly;
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - requiring respondents to submit more than an original and two copies of any document;
 - requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

In March 2024, the Office of Management and Budget (OMB) announced revisions to Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15) and published the revised SPD15 standard in the Federal Register (89 FR 22182). The present ICR contains no changes to the race and ethnicity items that have historically been part of this collection and is therefore compliant with the 1997 SPD15 standard. A request to revise the standards for this information collection will be forthcoming. The forthcoming revision request will address the new federal statistical standard for race/ethnicity items. The Department is currently working on an action plan for compliance with the newly revised SPD15 standards, which will fully take effect on March 28, 2029. Early discussions suggest that implementation of these standards will be particularly complex and delicate in data collections where race and ethnicity data is reported, to the Department, both by individuals about themselves and also provided by third parties providing aggregate data on the individuals they serve and represent (e.g., State and local education agencies, institutions of higher education).

8. **As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.**
 - **Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.**
 - **For the 30 day notice, indicate that a notice will be published.**
 - **Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**
 - **Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

On August 30, 2024, ED published for public comment, for a period of 60 days, a proposed request to extend this ICR for nine months to enable eligible agencies to meet their annual reporting requirements for Fiscal Year (FY) 2023 (89 FR 70617). We received one comment from a private citizen that was not germane to the ICR.

On September 11, 2024, ED published for public comment (89 FR 73638), for a period of 60 days, a proposed revision of this ICR for which we requested approval for three years for eligible agencies to meet their reporting requirements for FYs 2024 through 2026.⁵ On September 23, 2024, ED corrected an error in the publication of the proposed revised instrument for the CAR and posted the correct version. Due to this error, on October 15, 2024, ED extended the public comment period on the CAR for two weeks, to November 26, 2024 (89 FR 82994).

In addition to the required action that the Department was directed to take, the Department, during the initial 60-day public comment period, also convened representatives from the CTE field across 41 States and national organizations as part of its annual Data Quality Institute, which was held on September 10-12, 2024, and collected feedback on the proposed changes. Additionally, the Department held two town hall listening sessions on September 26, 2024, at 11 a.m. ET and 2 p.m. ET with representatives from the field and national organizations to collect feedback on the proposed changes. Representatives from the Department also met with States, national organizations, advocacy groups, and members of the CTE caucus to collect feedback on the proposed ICRs. At each public convening and stakeholder meeting, the Department documented questions and feedback offered by stakeholders and included that feedback alongside the public comments that the Department received during the formal 60-day public comment period.

We received 36 comments on the CAR revision that were submitted through Regulations.gov. We also received comments on the proposed data specifications in the proposed revision of Perkins V State Plan Guide that are applicable to the CAR ICR as well as feedback from State agency officials during briefings about the revisions to the two ICRs and in correspondence from members of Congress. We address all of the comments we received that are germane to this ICR⁶ in the attached document.

We consolidated the CAR extension and revision into a single package and published it for 30 days for public comment in the Federal Register (89 FR 95760) on December 3, 2024. A separate 30-day notice for revisions to the Perkins V State Plan Guide (1830-0029) was published in the Federal Register (89 FR 95188) for public comment on December 2, 2024. We received 6 comments on the CAR revision. Because several commenters addressed both ICRs in their comments, we addressed comments received during the 30-day public comment period together in the attached summary document. The document

⁵ Also on September 11, 2024, ED published for public comment, for a period of 60 days, another ICR associated with Perkins V, a proposed revision of the Perkins V State Plan Guide (1830-0029) which solicits State Plans from States (89 FR 73639). The State Plan Guide and the CAR revisions included identical proposed data specifications for the numerators and denominators of the core indicators of performance described in section 113 of Perkins V. For the convenience of readers, we address public comments on the proposed data specifications both in the responses to public comments on this ICR and in the responses to public comments on 1830-0029.

⁶ We received one comment on the proposed extension and two comments on the proposed revision that were not germane to the CAR ICR.

also describes the changes we are making in response to the feedback that we received. We address all of the comments we received that are germane to this ICR in the attached document.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.

No payments or gifts will be provided to respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.⁷ If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.**

The Department makes no pledge about the confidentiality of the data provided by respondents of this information collection. No personally identifiable information is collected; only State aggregate data is reported through this ICR.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature contained in this information collection.

- 12. Provide estimates of the hour burden for this current information collection request. The statement should:**

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**

⁷ Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

- Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.
- Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.

Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.

The burden hours associated with this collection comprise the hours required by State officials to provide the student enrollment, fiscal, and student outcome data required under the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins V). Our estimate of the burden hours is based upon public comment and our past consultations with nine State officials in the agencies that respond to this ICR and their review of the forms and instructions and consultations in 2024 with eligible agency officials from four States, two professional associations that represent CTE administrators at the State and local level, two associations that represent other CTE stakeholders, and two professional associations that represent other CTE stakeholders. The increase in burden hours in 2025 (reporting on the 2023-2024 program year) is the result of the addition of another respondent (U.S. Virgin Islands). For 2028 (reporting on the 2026-27 program year), we are proposing to require a response to up to nine (9) additional narrative questions (depending on the number of secondary program quality indicators a State reports data on) related to the following areas: (1) identification of CTE concentrators; (2) accountability for results; (3) size, scope, and quality; and (4) high-skill and high-wage occupations and industries. Additionally, reporting for the 2026-27 program year will include, to the extent the data are available, submission of a table that collects data on students in the middle grades who participate in activities supported by Perkins V funds. While respondents would have the option to respond to these items in earlier years, we do not expect any eligible agency to do so. We estimate that one third of respondents will be able to provide middle school participation data and would incur 15 hours of additional burden preparing and submitting these data in 2028. We also estimate 12 additional hours for all respondents in 2028 to respond to the additional narrative items.

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
2025 2023-2024 (FY 2023) Perkins V CAR reporting period (due by January 31, 2025) 2024-2025 (FY 2024) Perkins V CAR reporting period (due by January 31, 2026)	54	108*	238	25,704	\$72.72	\$1,869,195
2026 2025-2026 (FY 2025) Perkins V CAR reporting period (due by January 31, 2027)	54	54	238	12,852	\$72.72	\$934,597
2027 2026-2027 (FY 2026) Perkins V CAR reporting period (due by January 31, 2028)	54	54	255	13,770	\$72.72	\$1,001,354
Annualized Totals	54	54	243	13,122 (3 year avg: Response x	\$72.72	\$1,268,382

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
				time per response)		

* We estimate that we will receive two years of performance reports in calendar year 2025.

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)
 - The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.
 - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
 - Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.

Total Annualized Capital/Startup Cost :

Total Annual Costs (O&M) : _____

Total Annualized Costs Requested :

There are no such costs to respondents.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The annual cost to the Federal government to implement this information collection is estimated at \$61,288.50. This includes contractor beta testing and web site maintenance, and the salaries and expenses of DATE program staff who manage the process and review the CAR data. The method used to estimate the annual cost is as follows:

Number of Employees	Employee Grade	Estimated number of hours per employee	Total number of estimated hours	Estimated hourly Cost	Total Annualized Costs
3	GS-14	87	261	\$75.70	\$19,757.70
2	GS-13	90	180	\$64.06	\$11,530.80
total staff cost					\$31,288.50
Contractor estimate					\$30,000.00
Total Federal Costs					\$61,288.50

- 15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).**

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden		+252	+238
Total Responses		0	+1

Changes Due to Adjustment in Agency Estimate

Since approval of this ICR, the U.S. Virgin Islands became a Perkins V grantee, increasing the number of respondents from 53 to 54. It previously combined its Perkins V grant allocation with funds from other Department programs through the Consolidated Grants for Insular Areas authority and was not responsible for reporting under Perkins V.

Program Change Due to Agency Discretion

Of the total burden hour increase of 490 hours, 252 hours are associated with the proposed addition of nine (9) narrative questions that (depending on the number of secondary program quality indicators a State reports data on) related to the following areas: (1) identification of CTE concentrators; (2) accountability for results; (3) size, scope, and quality; and (4) high-skill and high-wage occupations and industries; and the addition of a table that collects data on enrollment of middle grades students and their demographics beginning in the fourth year of the collection, to the extent such data are available to respondents. Our estimate assumes that the addition of the enrollment table would require state officials to increase the number of hours they spend to train eligible recipients to provide the enrollment data, clean the data they receive, and report the data to the Department.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

An annual report to Congress is prepared and published using the information collected in the CAR instrument. Enrollment and accountability data are also made available on the Department's Perkins Collaborative Resource Network (PCRN) at cte.ed.gov. On the PCRN, interested parties can view data for individual States, as well as run customized reports with aggregated and disaggregated data on the students who participate and concentrate in CTE programs across the nation.

Below is the general schedule for production:

Task	Timeline
States submit CAR data during reporting window	October 1-January 31
DATE staff review State's CAR submissions	February 1 – April 15
States receive notification on the approval of their CAR submissions	April 15
DATE staff, in collaboration with contractors, tabulate data and prepare individual State profiles	April 15 – May 15

DATE staff develops draft report	June 15
DATE staff submits final draft report for Department clearance	July 1
DATE staff submits final report for Office of Communications and Outreach for final editing and printing	July 31
DATE staff submits final report to Congress	August 15

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking this approval.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

There are no exceptions to the certification statement identified in the Certification of Paperwork Reduction Act.