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Secretary Miguel Cardona
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: Docket IDs ED-2024-SCC-0111 & ED-2024-SCC-0112
Carl D. Perkins Career and Technical Education Act State Plan Guide & Consolidated Annual
Report (CAR) – Additional Comments Regarding Proposed Information Collection Request (ICR)

Dear Secretary Cardona,

The Wisconsin Technical College System (WTCS) serves as the state administering agency of Perkins Career and Technical Education (CTE) funds. In partnership with the Department of Public Instruction (DPI), Wisconsin distributes funds to all 16 technical colleges, two tribal colleges and universities and more than 400 K-12 school districts.

In November 2024, WTCS asked the Department to reconsider many of the changes included in the Proposed Information Collection Request (ICR) due to the significant administrative burdens, diversion of resources from essential projects, and limitation on states' ability to leverage data in ways that best support students and the continuous improvement of valuable CTE programming. WTCS appreciates the Department's subsequent revisions to the ICR and invitation to stakeholders to provide additional comments.

WTCS is supportive of the Department's new proposal to remove all new narrative items from the State Plan Guide. The removal of new narrative items addresses many of WTCS concerns related to the extensiveness of the policy changes proposed and removes the need for Wisconsin to engage in the full breadth of Perkins V's comprehensive state plan development requirements and save more than 600 hours of staff time and \$30,000.

In addition, WTCS is supportive of the Department's new proposal that middle grade participation data be provided "to the extent such data are available." Because middle grade data is not currently available in Wisconsin and significant changes would be needed to report this data to the Department, this revision to the proposed instructions saves more than \$35,000 in personnel costs.

Indicator Data Collection Issues Remain

As mentioned in previous comments, the Department's proposed changes limits Wisconsin's current methodology of collecting indicator data for a cohort of students. The Department's response #60 asserts that modifications to the proposed data specifications for 2P1 address these concerns; however, the Department is not accurately capturing the impact that this change will have in Wisconsin. The current approach in Wisconsin is to assign students to cohorts if they meet the CTE concentrator definition. The progress of these students is **tracked over three years**. During this timeframe, students that complete a program are considered credential attainers for 2P1 and their placement six months following completion

is evaluated for 1P1. Wisconsin's current cohort methodology is essential for high-quality longitudinal data analysis because most students enroll on a part-time basis. The Department's proposed modifications to the denominator and numerator of 2P1 only capture the current year and the prior year, shortening the period of tracking time compared to Wisconsin's current practice. Changes to Wisconsin's current cohort methodology will undermine the effectiveness of state data and obscure the impact of program changes, diluting Wisconsin's data quality and making it less actionable for timely improvements.

Moreover, to implement the modifications proposed by the Department, WTCS must invest significant IT resources to upend current data systems. Based on preliminary estimates, nearly **500 hours of staff time over the course of six months** will be needed to implement the necessary data and technology updates at both the state and local level and ensure that all stakeholders have the appropriate training and technical assistance to implement the changes. The cost of this change could approach **\$25,000**. In addition, WTCS maintains rich data tools that require resources to sustain, including the IT resources and staff that will be diverted to accommodate the revisions proposed by the Department. Not only will the changes proposed by the Department result in direct administrative costs, but also the opportunity costs of delaying other important and impactful projects that rely upon finite financial and staffing resources.

Administrative Burdens Remain

While WTCS is supportive of many of the revisions that the Department has proposed, WTCS continues to have concerns with several items remaining within the ICR. First, the Department's proposed changes in the CAR create several new narrative items and additional data components across several areas with considerable impact, including, but not limited to, modifications to numerator/denominator and disaggregation requirements for Perkins V placement measures. Collectively, these changes will result in additional staff time and effort to implement.

Second, while the Department's responses acknowledge commenters' concerns related to the administrative burden of the Post-Program Placement data collection for CTE Concentrators that exit a school district prior to graduation, no revisions to the ICR have been proposed. As a result, the time and effort burdens for public schools remain a concern. Because State of Wisconsin agencies do not have systems in place to share student data, the entire burden falls to local education agencies. Currently, DPI does not have student contact information and does not use or have access to student social security numbers and cannot use other state agencies to match data on students that left education early.

The revisions that the Department has proposed in response to public comments on the ICR include several adjustments that reduce the administrative burden on states and WTCS welcomes these revisions. However, several burdensome and costly proposals remain unchanged in the ICR. Please consider the significant impact that these remaining proposals will have on Wisconsin.

Sincerely,



Layla Merrifield
President