



September 25, 2025

Ross Santy
Chief Data Officer
Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave SW, Washington, DC 20202-1200

In re: Docket No.: ED-2025-SCC-0014 & ED-2025-SCC-0013

To Whom It May Concern,

On behalf of Advance CTE, the national membership association representing the state and territory leaders of our nation's Career and Technical Education (CTE) system, and the Association for Career and Technical Education (ACTE), the nation's largest not-for-profit organization dedicated to the advancement of education that prepares youth and adults for successful careers, we write today to extend our members' gratitude for reaffirming pre-existing reporting requirements under the Carl D. Perkins Career and Technical Education Act (Perkins V) State Plan Guide and Consolidated Annual Report (CAR) Information Collection Requests (ICRs).

Our organizations and respective memberships are grateful that ED has maintained focus on ensuring uninterrupted Perkins V implementation by continuing to utilize pre-existing ICRs for state plans and CAR submissions. Continuity of Perkins V implementation, particularly at this late stage in the law's lifecycle, is critical for states, schools, districts, and institutions that depend on consistent program requirements needed to promote high-quality CTE.

We applaud ED for listening to the significant feedback provided by the CTE community over the past year on this topic and its commitment to working in partnership with the field to restore existing requirements. The previously proposed ICRs would have imposed burdensome and counterproductive reporting and data collection requirements that went well beyond the scope and intent of Perkins V. These earlier proposals generated widespread concern across the education, workforce, and policy communities—including from our organizations and our members—because they would have introduced costly, time-consuming changes at an extremely late stage in the law's implementation cycle without providing clear value to states, local recipients, or most importantly, CTE learners.

Restoring the original ICRs will help to preserve the stability, flexibility, and clarity that states and local CTE leaders and practitioners need to effectively implement Perkins V, and will appropriately avoid disruptive changes to Perkins V implementation at a time when states are focused on delivering high-quality CTE programs that align with evolving labor market needs.

We look forward to continuing to engage with ED on Perkins V and other topics of interest to the CTE community and would welcome the opportunity for further discussion. To do so, please reach out to ACTE's Manager of Government Relations, Jimmy Koch (jkoch@acteonline.org) or Advance CTE's Federal Policy Advisor, Steve Voytek (svoytek@careertech.org).

Sincerely,

A handwritten signature in black ink that reads "LeAnn Curry". The script is fluid and cursive, with the first name "LeAnn" written in a slightly larger, more prominent hand than the last name "Curry".

LeAnn Curry
Executive Director
ACTE

A handwritten signature in black ink that reads "Kate Kreamer". The script is fluid and cursive, with the first name "Kate" written in a slightly larger, more prominent hand than the last name "Kreamer".

Kate Kreamer
Executive Director
Advance CTE