



October 14, 2026

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: Agency Information Collection Activities; Comment Request; Consolidated Annual Report (CAR) for the Carl D. Perkins Career and Technical Education Act of 2006, Docket No. ED-2026-SCC-2740 (OMB Control No. 1830-0569)

Dear Mr. Santy:

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 to express our support for the U.S. Department of Education's (ED's) proposed revisions to the Consolidated Annual Report (CAR) for the upcoming program year for the Carl D. Perkins Career and Technical Education Act's (Perkins V) state grant program. The proposed revisions are targeted, responsive to feedback from the field, and reflect a welcome effort to reduce the reporting burden carried by state CTE agencies without compromising the quality or comparability of Perkins V data.

We particularly appreciate ED's decision to align the performance reporting instructions and forms with the modernized [National Career Clusters[®] Framework](#). States have already begun aligning their programs of study, comprehensive local needs assessments (CLNAs), and related data systems and infrastructure to this new Framework. Updating the CAR in this manner for the upcoming program year will ensure that federal reporting keeps pace with that work rather than requiring states to maintain and reconcile two frameworks.

We also support the new instruction directing states to explain year-over-year changes of 25 percent or more in participant or concentrator enrollment through the "Additional Information" text box on the related enrollment forms. Changes in enrollment of that magnitude can have entirely legitimate explanations—for instance a change in a state's graduation requirements or the implementation of a new funding formula implicating CTE—but they can also signal an anomaly that is considerably easier to resolve while a state is still within its reporting window than sometime after the fact. As you are aware, CAR data ultimately populates the annual report to Congress and the public-facing data on oetae.ed.gov. It is therefore critical that a quality check such as this be embedded in the annual reporting processes for Perkins V. We further appreciate that ED set this threshold high enough to surface genuine irregularities without generating narrative burden for ordinary fluctuations as well as

applying this new data guardrail to both participant and concentrator enrollment counts. Finally, we would like to flag that the new enrollment reporting instruction currently reads "an increase or decrease of 25% of more," [sic] which we assume is intended to read "or more."

We likewise welcome the streamlining of the Financial Status Report (FSR) instructions and associated forms. Eliminating the four Net Outlays fields, auto-calculating the subtotal and balance rows, and reducing the FSR from 11 reporting columns to five and 12 reporting rows to nine will spare state fiscal staff work that is largely duplicative of information ED can obtain through its own grants management systems. This is a practical step consistent with the Department's obligations under the Paperwork Reduction Act to minimize burden on respondents. We further encourage ED to continue looking for similar opportunities to align its administrative and oversight work with regards to Perkins V.

We note one item warranting clarification. The revised instructions retitle Block V as the "Grant Notice of Award Number and replace the reference to the Grant Award Notification with the Notice of Award, and Block VI now indicates that the grant award amount will be automatically populated rather than entered by the state. We understand this reflects the broader transition in federal award and payment systems now underway. However, we ask that ED confirm how a state should proceed if the auto-populated award amount does not match its own records. States remain accountable for the accuracy of what they certify and much of the rest of the FSR is calculated against that figure.

Finally, we would ask ED to reconcile the burden figures in the *Supporting Statement* before formally submitting this collection to the Office of Management and Budget. Item 12 reports 230 hours per response across 54 respondents, which aggregates to 12,420 total annual hours total rather than the 12,190 hours stated in the Supporting Statement and the Federal Register notice. Item 15 then gives three different figures for the resulting burden reduction, only one of which is consistent with the change from 234 to 230 hours per response.

We appreciate your time and consideration of our comments and recommendations. Should you have any questions or would like to discuss the issues raised in this letter further, please do not hesitate to contact ACTE's Chief Policy, Research and Content Officer Alisha Hyslop (ahyslop@acteonline.org) or Advance CTE's Federal Policy Advisor Steve Voytek (svoytek@careertech.org).

Sincerely,



LeAnn Curry
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