

**U. S. Department of Education  
Office of Career, Technical, and Adult Education**

**Responses to Public Comments on the  
Perkins V Consolidated Annual Report (CAR) Guide**

Three sets of public comments were received on the U. S. Department of Education’s (Department) Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) Consolidated Annual Report (CAR) Guide during the thirty (30) day period from March 29 – April 29, 2019. The Department’s responses to those comments, as provided below, are organized by the Table of Contents for the guide.

**II. NARRATIVE**

Although not part of public comment, we noted that while we asked eligible agencies to submit their estimated local allocations as part of their Perkins V State plans, we also need to gather State’s final local allocations as part of their CAR reports and the NCES identifiers for each subrecipient to assist the Institute of Education Sciences (IES) in carrying out the independent evaluation of Perkins V that is required by section 114 of Perkins V. Collecting these data through the CAR will eliminate the need for IES to collect this information later through a separate and additional ICR. We added this requirement to a newly-designated Item 2: Fiscal Responsibility to Section II.B: Narrative Performance Report.

**III. FINANCIAL STATUS REPORTS**

Several commenters noted minor inconsistencies between the instructions and reporting forms for the Financial Status Reports (FSRs)

Department’s Response: We appreciate the commenters’ input and have made changes to Item 2.a: Completing Row Items A-N, Funds for Local Distribution in Section III.A: Instructions and Items 1-2: Interim and Final FSR Forms, respectively, in Section III.B: FSR Forms.

**IV. PERFORMANCE DATA REPORTS**

Several commenters indicated that Item A.1.a.i. suggests that an eligible agency must report on both its Perkins-funded and non-Perkins funded public CTE programs, although this is not a requirement in the Perkins V statute.

Department’s Response: We agree with the commenters’ input and have clarified the language accordingly.

Several commenters encouraged the Department to require States to report on the enrollment of CTE participants and concentrators by gender, race/ethnicity, and special populations categories (rows) for each of the career clusters (columns). The commenters indicated that this cross-

tabulated data would allow for a more thorough analysis, at both national and State levels, of the representation and coverage of students in CTE programs and programs of study in the various career areas.

Department's Response: We appreciate the commenter's input and agree that enrollment data for participants and concentrators are needed for local recipients to meet the requirements of the comprehensive needs assessment pursuant to section 124(c)(2)(E) of Perkins V. This section requires local recipients to identify strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations. Accordingly, we have made changes to Item 1: Basic Reporting Instructions in Section IV.A: Instructions and Items 1-2: CTE Participant and Concentrator Enrollment Forms, respectively, in Section IV.B: Performance Data Forms

One commenter encouraged the Department to rename core indicator 1P1 "Postsecondary Placement."

Department's Response: We appreciate commenter's input and have made the corresponding changes throughout the guide.

One commenter suggested the Department remove "out-of-workforce individuals" as a category for reporting disaggregated data for the secondary core indicators, and "youth with a parent in activity military duty" and "youth who are in or have aged out of the foster care system" as categories for reporting disaggregated data for the postsecondary core indicators. The commenters indicated that these categories, like migrant for postsecondary, are not generally applicable to the education level for reporting and, as such, eligible recipients do not have the data systems to collect the information.

Department's Response: Upon review of the statutory requirements for reporting disaggregated data for the core indicators in section 113 of the Perkins V statute, we have included all the categories listed in section 113(b)(3)(C) of Perkins V as requirements for reporting on each of the secondary and postsecondary core indicators. We do not have discretion to exclude them. Instructions on entering data for small cell sizes or when data may not be available or apply are provided in Item 1.c.vii-viii in Section IV.A: Instructions for the Performance Data Reports.

One commenter suggested the Department reorder the structure and layout for reporting disaggregated data on the placement of concentrators under core indicators 3S1 and 1P1.

Department's Response: We appreciate the commenter's input and have made the corresponding changes to the forms in Item 3: CTE Concentrator Performance Forms in Section IV.B: Performance Data Forms.

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**Responses to Comments on the Supporting Statement for  
Paperwork Reduction Act Submission**

One commenter indicated that with the shift in the requirement for eligible agencies to report their information and data to the Perkins CAR Portal versus the EdFacts Submission System (as had been anticipated when the CAR guide and supporting statement with burden hours was first issued for public comment), the CAR data collection burden hours do not accurately reflect the significant amount of work and time states will invest in revising their data systems and reporting after FY 19-20, which is the transition year to the Perkins V statute.

Department's Response: We appreciate the commenter's input and have increased the burden hours to 40 for FY 2020, 270 for FY 2021, and 221 for FY 2022. The average burden hours per response is now 177.