

**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**

Public comments were received from two groups on the U. S. Department of Education’s (Department’s) 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 sixty (60) day period from July 23, 2021 – September 21, 2021. The Department’s responses to those comments, as provided below, are organized by the Table of Contents for the guide. Verbatim comments are provided in quotes.

OVERARCHING

Commenters expressed appreciation to the Department for making efforts to improve the process for reporting and to ensure information can be used to support the National Evaluation of Career and Technical Education under Perkins V.

Department’s Response: We appreciate the commenters’ perspectives and feedback.

II. NARRATIVE PERFORMANCE REPORT

Commenters encouraged the Department to clarify changes made in the Fiscal Responsibility Reporting section of the CAR guide. First, commenters noted a need to clarify Column C listed on the State Allocation Subaward Forms (pages 36-37) and described on pages 10-11 of the revised CAR guide. Commenters assume, and seek clarification that, “Column C represents the amount each local recipient would have been awarded if the formula was run with no minimum allocation requirements or consortia.” Commenters note that this would be “relatively easy for states to calculate and report.” However, commenters note that the directions, in their current form, do not clearly explain how states should account for education service agencies or area technical centers in this column that may be consortia fiscal agents or the ultimate recipients of funds but are not part of the original formula.

Department’s Response: We appreciate this comment and agree that it would be helpful to clarify Column C. To the first point, Column C is indeed intended to collect information about the original subgrant allocations before minimum allocation requirements were applied and before a recipient/institution or entity joined a consortium. To the second point, any educational service agency or area career and technical education school designated as a consortium fiscal agency or recipient of funds, and as not calculated in the original formula, should have a “0” in this column. In response to these two points, we are adding clarification language to pages 10 and 11 as suggested.

Second, commenters noted a need to clarify Column D listed on the State Allocation Subaward

Forms (pages 36-37) and described on pages 10-11 of the revised CAR guide. Commenters assume, and seek clarification that, the instructions and submission form “indicate that if institutions or districts joined a consortium and did not ultimately receive an individual allocation, then their entry in Column D would be “0”.” Commenters noted that this would be reasonable, in line with the additional time estimate provided, and would clearly indicate which institutions joined a consortium.

Department’s Response: We appreciate this comment and agree that it would be helpful to clarify Column D. Column D is intended to collect information on funds that recipients/institutions or entities actually received as direct recipients or as consortia fiscal agents. Recipients/institutions or entities that joined a consortium and were not the consortium fiscal agent should have a “0” in Column D. In response, we are adding clarification language on pages 10 and 11 as suggested.

Finally, commenters noted that the categories included in Column E on both the secondary submission form and postsecondary submission form (pages 36-37) are “too restrictive to yield fully accurate results.” Commenters note that there may be other reasons why institutions or school districts join consortia beyond the reasons currently captured by the reporting options for Column E. Commenters state that an “Other” option, at minimum, should be added to the coding choices in Column E.

Department’s Response: We agree with this comment on Column E that there may be other reasons for recipients/institutions to join a consortium. In response, we are adding a new response category on pages 11 and 12 as suggested. Additionally, the headers of Column E on the submission forms found on pages 36 and 37 have been updated to reflect the new response categories.

III. PERFORMANCE DATA REPORTS

Commenters expressed concern that the updated Basic Reporting Instructions, found in section IV.A.1.a.i on page 19, appear to change previous reporting requirements such that eligible agencies would have to report on all students participating in CTE programs in the state, even if they are enrolled in school districts, colleges and other institutions that do not receive any Perkins funding. Commenters note that the wording may lead states to interpret and respond to this change in different ways and recommend that the Department revert to the original language.

Department’s Response: We appreciate this comment and agree that it would be appropriate to revert to the original language with a small edit. The intent was to clarify, rather than change, the requirement for states to collect and report data for all students participating in public CTE programs operated by Perkins-funded eligible recipients, including CTE students enrolled at those institutions or districts that are not in Perkins-funded CTE programs. As such, the original language was reinstated with the addition of the word “all” before “CTE programs.”