

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Perkins V State Plan Guide (OMB Control Number 1830-0029)

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

This is a revision request to discontinue the information collection used by the U.S. Department of Education (Department) to gather State plans from eligible agencies under the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins V or the Act) (20 U.S.C 2301 et seq.), the Guide for the Submission of State Plans (State Plan Guide or Guide) (OMB Control Number 1830-0029), that was approved by OMB on January 14, 2025, and to reinstate the previous, OMB-approved version of the Guide.

State plans consist of narrative information, budgets, and performance levels pursuant to Perkins V (in particular, sections 113 and 122), applicable Federal regulations pursuant to the Uniform Guidance (2 CFR part 200), and Education Department General Administrative Regulations (34 CFR part 76). Eligible agencies, defined in section 3(18) of Perkins V, are the State boards, or sole State agencies, responsible for the administration of career and technical education (CTE) in the 50 States; the District of Columbia; Puerto Rico; the outlying areas of the United State Virgin Islands, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands; and the Republic of Palau. With few exceptions, the State boards delegate to another State agency responsibilities that involve the administration, operation, or supervision of its State plan, including the development and submission of the State plan.

SUPPLEMENTARY INFORMATION:

On December 2, 2024, the Department issued a new information collection for the State Plan Guide requiring state and local CTE providers under the *Carl D. Perkins Career and Technical Education Act of 2006* (Perkins V) to revise their Perkins V State Plans. These changes constituted a more federally prescriptive role not detailed under Perkins V by requiring States to establish numerators and denominators for core performance indicators of career and technical education (CTE) concentrators. In the *Federal Register* notice, the Department stated that it made this update to advance several goals: (1) require States to measure consistent indicators; (2) reduce the collection of potentially duplicative information; (3) promote the collection of data on the post-program placement outcomes of CTE concentrators; and (4) improve the consistency of the data collected from States to facilitate the “aggregate analysis” of performance data and State-by-State comparison of the law. During the public comment period, the Department received letters and feedback from the CTE community, an overwhelming majority of which were in opposition to the revised State Plan Guide. Following the

publication of the final information collection, the Department has continued to receive opposition from States, high schools, and community leaders, as well as public officials, raising significant concerns about the impact of the Guide on state and local programs.

The Department is withdrawing the December 2024 Guide as part of a comprehensive review of current regulatory efforts to ensure that they align with the program priorities set by the Trump Administration. The Department believes that the recently approved State Plan Guide would be massively disruptive and result in significant State and local level administrative burdens by requiring states to revise their performance indicators and resubmit their State plans right after the most recent four-year planning process. The December 2024 Guide would weaken alignment and coordination with other federal laws governing education and workforce systems by requiring changes to academic indicators and endorsing a separate planning process distinct from the cycle under the Workforce Innovation and Opportunity Act.

It would also reduce data quality by requiring local grantees to track and obtain data in new and different ways, negatively impacting their ability to utilize trend data to improve CTE programming at the local level. While the Department acknowledges the importance of measuring performance outcomes to ensure federal funding supports high-quality programs, the action taken through the Guide was beyond the legislative language included in Perkins V. Finally, the Guide includes many terms that are not defined in statute or regulations.

The Department intends to reinstate the prior, previously approved, version of the State Plan Guide. In doing so, eligible agencies would not be required to comply with the provisions in the December 2024 Guide, which total an estimated 1,000 hours of additional reporting compliance per State, but instead can be better spent on equipping the American workforce with the skills necessary to rebuild our economy.

Finally, the Department is making a *de minimus* update by footnoting any reference to “gender” to explain that the Department applies the term “gender” as used in Perkins V to mean “sex,” as defined in section 2(a) of Executive Order 14168 “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government.” The Perkins V statute at section 3(33) provides that: “Non-traditional fields means occupations or fields of work, such as careers in computer science, technology, and other current and emerging high-skill occupations, for which individuals from one gender comprise less than 25 percent of the individuals employed in each such occupation or field of work.” In implementing this statutory term, “non-traditional fields,” throughout the Guide, the Department uses the term “gender,” per the definition in section 3(33) of Perkins V. Consistent with section 3(c) of Executive Order 14168 “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government,” the Department applies the term “gender” as used in Perkins V to mean “sex,” as defined in Section 2(a) of Executive Order 14168, as “an individual’s immutable biological classification as either male or female.” “Sex” is not a synonym for and does not include the concept of “gender identity.”

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Pursuant to section 122(f) of Perkins V, the Department uses the information contained in each eligible agency's State plan and annual revisions to determine whether the eligible agency has met the requirements of the Act, including submitting State-determined performance levels that meet the criteria established in section 113(b)(3) and section 113(b)(3)(A)(i)(III). The Department also uses the information to determine areas in need of technical assistance in States, and to provide information on States' Perkins V initiatives, funding, and performance levels to Congress, interested stakeholders, and the public. States also use the data to measure and improve the outcomes of CTE programs and programs of study.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

The Department requires eligible agencies to submit State plans and annual revisions electronically via the Perkins V State Plan Portal at <https://perkins.ed.gov/pims>.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This is a unique data collection; there are no similar data collections which seek this information.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

This collection does not impact small businesses or other small entities.

6. **Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Pursuant to section 122(a)(1) of Perkins V, each eligible agency must submit a State plan or annual revisions for any fiscal year in which they seek assistance under the Act.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
 - **requiring respondents to report information to the agency more often than quarterly;**

- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This collection does not anticipate any such special circumstances.

8. **As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.**
 - **Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.**
 - **For the 30 day notice, indicate that a notice will be published.**
 - **Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**
 - **Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The Department will publish a 60-day notice in the Federal Register. The Department will publish a 30-day notice in the Federal Register and will review and respond to the comments received. Changes will be made when appropriate.

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.**

There will be no payments or gifts to respondents of this information collection.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.⁷ If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.**

The Department makes no pledge about the confidentiality of the data provided by respondents of this information collection.

11. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature contained in this information collection.

12. **Provide estimates of the hour burden for this current information collection request. The statement should:**

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector - businesses or other for-profit, private sector - not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden. Unless directed to do so, agencies should not conduct**

special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable.

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.
- Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.

Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.

The Department's estimated burden hours associated with the Perkins V State plan collection we seek to reinstate is based on previous consultation with State employees who are responsible for State plan development at nine (9) eligible agencies.

We estimate that the burden hours per response averaged across the three years of this information collection request will be 16.7 hours. Our estimates make the following assumptions:

- For 2025, 28 of the 54 respondents will submit revisions to their State determined performance levels (SDPLs) and budgets for the forthcoming fiscal year's State allocation, 16 of the 54 respondents will submit budgets for the forthcoming fiscal year's State allocation and make no substantive revisions to their existing State plans, and 10 of the 54 respondents will submit new 4-year Perkins State plans and budgets for the forthcoming fiscal year's State allocation.
- For 2026, 18 of the 54 respondents will submit revisions to their State determined performance levels (SDPLs) and budgets for the forthcoming fiscal year's State allocation, 26 of the 54 respondents will submit budgets for the forthcoming fiscal year's State allocation and make no substantive revisions to their existing State plans, and 10 of the 54 respondents will submit new 4-year Perkins State plans and budgets for the forthcoming fiscal year's State allocation.
- For 2027, 18 of the 54 respondents will submit revisions to their State determined performance levels (SDPLs) and budgets for the forthcoming fiscal year's State allocation, and 31 of the 54 respondents will submit budgets for the forthcoming fiscal year's State allocation and make no substantive revisions to their existing State plans, and five (5) of the 54 respondents will submit new 4-year Perkins State plans and budgets for the forthcoming fiscal year's State allocation.

The estimates for every year include the time required to review instructions, prepare a budget for the forthcoming fiscal year's State allocation, participate in training for the information collection tool, and to respond to the information collection. The estimates for submitting revisions to SDPLs also includes time required to compute any revisions to SDPLs, as well as the time required for public comment and responding to any comments.

Estimated Annual Burden and Respondent Costs Table

Year	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (Hourly Wage x Total Burden Hours)
2025	N/A	100%	54	54	19	1026	\$72.47	\$74,354
2026	N/A	100%	54	54	17	918	\$72.47	\$66,527
2027	N/A	100%	54	54	14	756	\$72.47	\$54,787
Annualized Totals	N/A	100%	54	54	16.7	900	\$72.47	\$65,223

We estimate the total cost per hour of the professional staff who will carry out this work to be \$72.47 per hour, the mean hourly compensation cost for State and local government workers who were in management, professional, and related occupations in September 2024.¹ The total annualized cost to respondents of the burden hours for this collection is estimated to be \$65,223, as indicated in the table below.

Type of Staff	Total Estimated Number of Burden Hours	Estimated Hourly Cost	Total Costs (Rounded to the Nearest Dollar)
Professional	900	\$72.47	\$65,223

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10),

¹ Bureau of Labor Statistics, U.S. Department of Labor, Employer Costs for Employee Compensation Historical Listing, National Compensation Survey, retrieved from <https://www.bls.gov/web/ecec/ecec-government-dataset.xlsx>

utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.

Total Annualized Capital/Startup Cost : \$0

Total Annual Costs (O&M) : \$0

Total Annualized Costs Requested : \$0

The total for the capital and start-up cost components for this information collection is zero. The information collection will not require the purchase of any capital equipment nor create any start-up costs. Computer and software used to complete this information collection are part of the respondents' customary and usual business or private practices, and therefore is not included in this estimate. The total operation and maintenance and purchase of service components for this collection is also zero. The information collection will not create costs associated with generating, maintaining, and disclosing or providing the information that is not already identified in item 12 of this supporting statement.

14. **Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Number of Employees	Employee Grade	Estimated Number of Hours per Employee	Total Number of Estimated Hours	Estimated Hourly Cost	Total Annualized Costs
3	GS-14	46	138	\$75.70	\$10,447
2	GS-13	46	92	\$64.06	\$5,894
Total Federal Costs					\$16,341

15. **Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the**

reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Annual Burden	N/A	N/A	-126
Annual Responses	N/A	N/A	N/A

Changes Due to Adjustment in Agency Estimate

The recent authorization for this information collection, which the Department now seeks a revision to discontinue, had a burden of 1,026 hours. The discontinuation of the currently approved December 2024 Guide and reinstatement of the previously approved Guide would decrease burden due to a change in agency estimates. The Department previously estimated that no State would submit new State plans and that all 54 respondents would only submit revisions to their State Determined Performance Levels (SDPLs) and budgets for the forthcoming fiscal year’s State allocations in each year (i.e. 2025, 2026, and 2027). The Department now estimates that a subset of the 54 respondents will select one of the three following State plan submission actions each year: (1) submit revisions to their SDPLs and budgets for the forthcoming fiscal year’s State allocation, (2) submit budgets for the forthcoming fiscal year’s State allocation and make no substantive revisions to their existing State plans, or (3) submit new 4-year Perkins State plans and budgets for the forthcoming fiscal year’s State allocation. This estimate represents a more likely scenario in which States would exercise the various State plan submission options available to them each year.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Timeline	Actions
January-February	Department issues program memorandum with due dates and reminders regarding State plan submissions.
No later than March ²	Department issues program memorandum with estimated allocations for each State for the upcoming fiscal year.

June 30 ³	Department approves State plans or annual revisions.
July 1	Department issues 1 st installment of State's Perkins V grant awards for the upcoming fiscal year.
October 1	Department issues supplemental and final installment of State's Perkins V grant award for the upcoming fiscal year.

State plans are integrated with other State information that now appears on the Department's website at <https://cte.ed.gov/profiles/national-summary>.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking this approval.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

There are no exceptions to the certification statement identified in the Certification of the Paperwork Reduction Act.

² The Department will publish estimated State allocations no later than March provided that an appropriation for the next fiscal year has been enacted into law by this time.

³ Where practicable, the Department may determine that it does not need the full 120 day period allowable under section 122(f) of Perkins V to review State plans and/or revisions and issue Perkins grant awards on schedule on July 1.