Carl D. Perkins Career and Technical Education Act of 2006 (Perkins V)
Perkins V Consolidated Annual Report Information Collection Request
(OMB Control Number 1830-0569)
Responses to Public Comments Received During the 60-Day Notice

On August 21, 2026, the U.S. Department of Education (ED) published for public comment, for a period of 60 days, revisions to the Consolidated Annual Report (CAR) (1830-0569) information collection request (ICRs) associated with the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins V). The CAR collects financial and performance information from States that receive Perkins V funds.

We received four (4) sets of comments. For the convenience of readers, we address the comments, broken out by topic.

Crosswalk for Career Clusters Framework

1. **Two commenters recommended publishing a crosswalk from the prior career cluster structure to the updated National Career Clusters Framework.**

Response: The Department appreciates the request for a crosswalk to map the equivalent elements between the career cluster structures. Advance CTE published a crosswalk that aligned the original 16 Career Clusters to the 14 Career Clusters of the modernized Framework. The crosswalk was intended to support the implementation of the National Career Clusters® Framework.

Changes: None

Changes to the Financial Status Report

2. **Two commenters mentioned the Financial Status Report (FSR). One commenter stated that the notice did not state how many hours the changes to the FSR remove, or the number of hours the cluster transition adds to its first year. The commenter requested that the 30-day notice specify the burden change attributed to each of the three revisions and if there were one-time recording costs included. The other commenter welcomed the streamlining FSR instructions and associated forms and stated that it will spare time for duplicative work.**

Response: The Department appreciates burden reduction efforts. The Supporting Statement estimated that the burden hours per response averaged across three years of this information collection request will reduce from 234 hours to 230 hours due to the elimination of some reporting elements on the FSRs and the auto-population of others. Additionally, as mentioned in the Supporting Statement, the recent authorization for this information collection had a burden of 12,636 hours. The total burden hour decrease of 216 hours was associated with the proposed adjustments to the FSRs which have been reduced from 11 reporting columns to only five (5) and 12 reporting rows to nine (9). The Department acknowledges the request for burden calculation for state level efforts; however, when estimating burden, it is calculated based upon the time needed to provide responses to the ICR and not to the

efforts at the state level for preparation of submission. The Department is pleased that streamlining the FSR and associated forms is welcomed and will result in eliminating duplicative work.

Changes: None

Additional Time for the Transition

3. **One commenter expressed concern about the amount of time for the transition from the original 16 Career Clusters to the 14 Career Clusters. The commenter stated that the implementation is immediate and states were provided limited opportunity to update their systems, adjust program coding structures, revise data collection processes, and train staff. A multi-year transition period was recommended.**

Response: The Department disagrees that additional time is warranted, as this matter has been under discussion since 2024. OCTAE has worked collaboratively with Advance CTE in sharing information about the modernized career clusters since 2024. OCTAE and Advance CTE held a Data Quality Institute presentation on the national career clusters. The presentation was shared with State Directors and Perkins data managers. Advance CTE has consistently provided technical assistance surrounding the new career clusters since their introduction in 2024 through webinars and online resources. Additionally, in 2024 Advance CTE published a guidebook with a crosswalk on the career clusters.

OCATE published a Program Memo that included information about the modernized Career Clusters Framework on March 26, 2026. In April 2026, The Department of Labor, through its Workforce GPS initiative, created a webpage to address the modernization of the National Career Clusters Framework.

Changes: None

Reconciling Burden Hours

4. **One commenter expressed concern about the burden hours in the Supporting Statement. The commenter stated, "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."**

Response: The Department appreciates diligence in reviewing reported burden hours and apologizes for this typing error. The original *Total Annual Burden Hours* reported was 12,190 and would be the product of 53 responses and 230 average burden hours; it is not the product with 54 respondents. The total hours within the table in Item 12 will be updated to reflect the correct *Total Annual Burden Hours* of 12,420.

Changes: Update the *Total Annual Burden Hours* to 12,420.

Performance Reporting

5. **One commenter appreciated the alignment of performance reporting instructions and forms with the modernized National Career Clusters® Framework. The commenter shared that states have been working on alignment between the new framework and their programs of study, comprehensive local needs assessments (CLNAs), and related data systems and infrastructure. It was stated that updating the CAR for the upcoming year eliminates states maintaining and reconciling two frameworks and keeps federal reporting at pace with the work States are already doing. Another commenter urged the Department to keep the revised Performance Reporting Forms centered on outcomes, primarily credential attainment and placement after exit and to invite States with wage-record linkage to report earnings.**

Response: The Department is pleased the changes to the CAR will reduce burden to the States and result in more streamlined work. The Department intends to continue collecting and reporting State Perkins performance data in accordance with the statutory requirements listed in section 113(b)(2)(A & B). Thank you for your comment regarding the collection of performance outcomes, primarily credential attainment and placement after exit and the addition of wage-record linkage to report earnings. At this point in time, the collection of data elements is aligned to statutory requirements in the Carl D. Perkins Act. However, the Department will consider the suggestion when the act is scheduled for reauthorization.

Changes: None

Clarification of Details Surrounding Financial Reporting

6. **One commenter expressed concern with the level of specificity regarding information that would no longer be collected in financial reporting and was concerned that it would result in difficulty assessing whether the change "would reduce transparency or program oversight."**

Response: The Department appreciates concern regarding the need for details in financial reporting. As referenced in the Supporting Statement submitted, "as a recipient of Federal funds, each eligible agency must comply with the requirements for submitting annual financial reports to the Department pursuant to 2 CFR 200.328. To meet these requirements, an eligible agency must complete two separate forms, an interim financial status report (FSR) and a final FSR, each containing the same items. The interim FSR covers the first 12 and/or 15-month period for which the grant was awarded, while the final FSR covers the entire 27-month period for which the grant was awarded.

Each eligible agency must submit its narrative performance report, FSRs, and performance data forms for the core indicators to the Perkins Consolidated Annual Report Portal at https://Perkins.ed.gov. The deadline for each eligible agency to submit its CAR submission is January 31 of the year following the most recently completed program year."

Additional detail is provided in the supplementary information section and states, "the Department is eliminating the requirement for States to report: Net Outlays Previously Reported, Total Outlays This Report Period, Net Outlays This Report Period, and Net Outlays to Date. The Department has

determined that this information is duplicative of information that can be garnered from its grants management systems and should therefore not be reported via the CAR. Finally, the Department has updated its CAR reporting system to auto-populate several fields in the FSR thereby eliminating the requirement for States to report: Subtotal – Funds for State Leadership, Federal Share of Outlays and Unliquidated Obligations, Balance of Federal Funds, Subtotal – Local Formula Funds, Subtotal – Funds for Local Distribution, Subtotal – Funds for State Leadership, Subtotal – Funds for State Administration, and Total Funds. In sum, the FSRs have been reduced from 11 reporting columns to five (5) and 12 reporting rows to nine (9)."

Changes: None

Adding a Data Quality Statement to State Performance Reports

7. **One commenter recommended adding a data quality statement to each State's performance reports that included information about "linkage match rates, the share of records missing key fields, and any imputation method."**

Response: The Department appreciates the recommendation to add a data quality statement to each State's Performance Report. At this point in time, the collection of data elements is aligned to statutory requirements in the Carl D. Perkins Act. However, the Department will consider the suggestion when the act is scheduled for reauthorization.

Changes: None

Preserving State Flexibility in How Data are Collected and Linked

8. **One commenter expressed that States should be permitted to choose the systems they use to produce the data. The commenter stated, "The Department should specify what is reported and how it is defined, and let States choose the systems that produce it. Machine-readable templates with validation rules built in, and fields carried forward from the prior year where nothing changed, would cut both burden and error."**

Response: The Department provides the structure, definitions, and validation rules for data submission within the Perkins Web Portal. States have the flexibility to determine how to collect, internally validate, and organize their data in preparation for submission to the Department. States have the flexibility to use their own data collection systems and protocols.

Changes: None