



January 24, 2025

The Honorable Denise Carter
Acting Secretary of Education
U.S. Department of Education
400 Maryland Ave SW, Washington, DC 20202-1200

Dear Acting Secretary Carter,

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 are writing regarding the U.S. Department of Education's recently proposed changes impacting the implementation of the Carl D. Perkins Career and Technical Education Act (Perkins V).¹

As you are aware, in recent weeks ED has continued to advance significant and counterproductive changes to two Information Collection Requests (ICRs) impacting Perkins V's State Plan Guide and related Consolidated Annual Report (CAR) requirements. Our organizations, along with a number of states and other entities, [including policymakers](#), have consistently raised significant concerns about these proposals since they were first unveiled last fall.² These efforts are regulatory in nature, mandating specific data collection approaches and related reporting methods that go far beyond the statutory requirements and intent of Perkins V, and do not help states or local programs create additional benefit or value for learners. Concerningly, ED has proposed these wide-ranging modifications nearly six years after the legislation was passed by Congress.

Despite these significant concerns, the previous Administration finalized these proposals just a few days before January 20, 2025. The accelerated consideration of these ICRs has contributed to a perception that ED has not meaningfully reviewed stakeholder feedback regarding this issue. In fact, an updated version of this proposal appears to have been developed by ED in less than a few days.

The changes contained in these proposals present significant challenges for states seeking to implement this legislation, creating enormous and unnecessary administrative burden. While difficult to calculate with precision, we strongly believe that ED's current estimates related to these

¹ https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202409-1830-002 and https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202409-1830-001

² Advance CTE and ACTE Comments in response to these proposals can be found here: https://careertech.org/wp-content/uploads/2025/01/Advance-CTE-ACTE-State-Plan-ICR-Response_FINAL.pdf; https://careertech.org/wp-content/uploads/2025/01/Advance-CTE-ACTE-CAR-ICR-Response_FINAL.pdf; and https://careertech.org/wp-content/uploads/2025/01/Advance-CTE-ACTE-Revised-ICRs-Response_1.2.2025_FINAL.pdf

ICR's burden on states and local Perkins V grantees– both in terms of real and opportunity costs as expressed in staff time and resources– remains grossly inaccurate. For example, we have received feedback from state members that these changes will require the re-coding or updating of existing systems of data collection and reporting which could require up to an additional 1,000 hours of staff time to successfully complete per state. These estimates are not inclusive of other elements of Perkins V that may be triggered as a result of these ICRs, such as the need to engage in public comment and feedback across states.

ED is well positioned to reverse course on this effort and we are kindly requesting that your agency formally rescind these proposals and revert to previous versions of the Perkins State Plan Guide and CAR Report before states are forced to initiate a costly and time-consuming multiyear effort to implement these regulatory changes. We would welcome the opportunity to speak with you further about this issue and look forward to engaging with your Department as the Trump Administration continues to take shape. To do so, please reach out to ACTE's Manager of Government Relations, Jimmy Koch (jkoch@acteonline.org) or Advance CTE's Policy Advisor, Steve Voytek (svoytek@careertech.org).

Sincerely,



LeAnn Curry
Executive Director
ACTE



Kate Kreamer
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