



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF CAREER, TECHNICAL, AND ADULT EDUCATION

DIVISION OF ADULT AND TECHNICAL EDUCATION

### PROGRAM MEMORANDUM 26-3

DATE: February 4, 2026

TO: State Directors of Career and Technical Education

FROM: Adam Flynn  
Director – Policy, Research, and Evaluation

SUBJECT: Requirements and Instructions for the Submission of Perkins V State Plan Revisions and Budgets for Fiscal Year 2026 Grant Awards – OMB Approval Number: 1830-0029

Pursuant to the *Guide for the Submission of Perkins V State Plans* (OMB Approval Number: 1830-0029, Exp. 1/31/2028), this memorandum provides the U.S. Department of Education's (Department's) requirements and submission instructions for each eligible agency (State) to receive its Fiscal Year (FY) 2026 grant award under the *Carl D. Perkins Career and Technical Education Act of 2006* (Perkins V, the Act, or statute).

These requirements apply to all States regardless of whether they submit their Perkins V State Plan as a standalone plan or as part of a Workforce Innovation and Opportunities Act (WIOA) Combined State Plan. The Department anticipates issuing FY 2026 Perkins V grant awards on July 1, 2026 (initial award), and October 1, 2026 (supplemental award), with funds available for a 15-month performance period from July 1, 2026, through September 30, 2027. This memo also provides the Department's revised interpretation of section 122 of Perkins V and 34 CFR Part 76, which outline the requirements States must follow when modifying approved Perkins State Plans.

### Statutory Requirements for FY 2026 State Plan Submissions

For the fiscal years following those covered by your currently approved Perkins State Plan, each State must submit one of the following pursuant to section 122(a)(5) of Perkins V to ensure it remains in compliance with the Act:

- Option 1: A subsequent (new) 4-year Perkins State Plan that includes:
  - State determined performance levels (SDPLs) for the fiscal years covered by the plan; and
  - a budget for the upcoming fiscal year.
- Option 2: A revised Perkins State Plan that includes:
  - SDPLs for the upcoming fiscal year;

- a budget for the upcoming fiscal year; and
- any other revisions that the eligible agency determines to be necessary pursuant to section 122(a)(1) of Perkins V.

A State may continue to submit, or newly elect to submit, its Perkins State Plan as part of a WIOA Combined State Plan under Options 1 and 2.

Section 122 of Perkins V outlines the requirements that States must follow when establishing a 4-year Perkins State Plan to include:

- (1) broad stakeholder consultation;
- (2) public hearings;
- (3) a public comment period; and
- (4) an opportunity for the Governor to sign the plan.

Perkins V also provides that States “*may submit such annual revisions of the State Plan to the Secretary as the eligible agency determines to be necessary*” while outlining that States engage in broad stakeholder consultation and a public comment period when revising SDPLs.

Under 34 C.F.R. § 76.140, States must follow the same procedures used to establish their original plan when a revision results in a “*significant and relevant change in...the information or assurances in the plan; the administration or operation of the plan; or the organization, policies, or operations of the State agency that received the grant, if the change materially affects the information or assurances in the plan.*” Please see below for updated guidance.

### **Clarification to the Process to Modify Perkins State Plans**

In 2023, the Department interpreted section 122 of Perkins V and 34 C.F.R. Part 76 to require States to follow the more extensive “amendment” procedures described in 34 C.F.R. Part 76 when making any modification to a Perkins State Plan beyond technical updates.

Subsequently, the Department received feedback from States and other interested stakeholders that this process is burdensome and may hinder States’ and local entities’ ability to nimbly update their plans in response to workforce needs and labor market data. Therefore, after careful consideration of this feedback, along with a review of historical State Plan modifications during the four years a State Plan is in effect, the Department clarifies that for the purposes of modifying Perkins State Plans, States are only required to follow the procedures in 34 C.F.R. part 76 when a modification rises to the level of being “significant and relevant” under the “amendment” standard described in 34 C.F.R. § 76.140.

Given the historical scope of modifications by States under a four-year State Plan, the Department believes it is unlikely that States will need to modify their Perkins State Plans

to the extent that such an extensive amendatory process is required. In the context of a Perkins State Plan, a significant and relevant amendment is a change that would rise to the level of being a de facto replacement of the existing approved Perkins State Plan. Please note that nothing prevents States from going through an amendatory process for any Perkins State Plan modifications if the State wishes to do so or if the State must already undergo a similar process required by State law.

If a State determines that no such significant and relevant amendatory changes are being made, it may update its Perkins State Plan as necessary and follow the procedures for revising SDPLs outlined in section 113(b)(3)(A)(i)(III) of Perkins V, as described below.

### **Revision of State Determined Performance Levels (SDPLs)**

A State may revise its SDPLs for one or more years under the Perkins V statute. Pursuant to section 113(b)(3)(A)(iii), if unanticipated circumstances arise in a State or changes occur related to improvement in data or measurement approaches, the State, at the end of the program year, may revise its SDPLs. However, please note that pursuant to section 123(a)(5) of Perkins V, an eligible agency may not adjust performance levels for any core indicators that are subject to, and while executing, an improvement plan pursuant to section 123(a) of Perkins V. States seeking to revise SDPLs for a core indicator that is subject to an improvement plan must demonstrate to this office that such plan has been fully executed. Your Perkins Coordinator will reach out to gain this documentation as necessary. Any adjustments to SDPLs must be made in accordance with the requirements outlined in section 113(b)(3)(A)(i)(III) of Perkins V.

### **Revisions to WIOA Combined State Plans**

Under WIOA, the Unified and Combined State Plans communicate the State's vision for its public workforce system and broader talent development system. WIOA planning requirements seek to align federal investments in job training and education programs, improve service delivery efficiency, and match individuals' skills with high-paying job opportunities and employers. Cross-program planning promotes a shared understanding of workforce needs and enables the public workforce system to provide a wider range of services that require coordination to meet the needs of employers, youth and adult learners, and workers. States are encouraged to engage WIOA stakeholders in revising their Perkins State Plans and to consider entering into a new Combined State Plan if such an approach is deemed feasible and advantageous to the achievement of the State's workforce development and education objectives.

This memorandum does not address procedures for a State to modify a WIOA Combined State Plan pursuant to section 102(c)(3) of WIOA and 34 CFR § 463.145. A State that needs to make modifications to the Perkins section of a WIOA Combined State Plan must contact its Perkins Coordinator for those submission instructions.

## Submission Process and Technical Assistance

Each State must submit the applicable items listed above to the Perkins State Plan Portal no later than the close of business on **Thursday, April 30, 2026**. This deadline has been adjusted from previous years to achieve alignment with the WIOA State Plan modification timeline.

The Department will host an online training session regarding the submission of items to the Perkins State Plan Portal in February 2026. Further details will be sent under separate cover and posted to the Calendar on the Perkins Collaborative Resource Network at <https://cte.ed.gov>.

If your State includes Perkins as part of its WIOA Combined State plan, it must submit its budget and SDPLs to the Perkins State Plan portal and any narrative revisions to the WIOA State Plan Portal as part of its 2-year modification by **Thursday, April 30, 2026**.

Please contact your Perkins Coordinator if you have any questions regarding the submission requirements and process for your FY 2026 Perkins V grant award. A state-by-state listing of these staff members is available at <https://cte.ed.gov/contact/staff-by-state-responsibility>.

We look forward to continuing to work with you as you implement your Perkins V State Plan and provide all students with access to and success in high-quality career and technical education programs.