

SUPPORTING STATEMENT

A. Justification:

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collections. Attach a copy of the appropriate section of each statute and of each regulation mandating or authorizing the collection of information.**

The purpose of this information collection is to reinstate Information Collection approval for the Native American Career and Technical Education (NACTEP). The NACTEP program was originally approved under OMB Control Number 1830-0542.

The Perkins Act expired on October 1, 2003. Given the recently authorized Perkins IV, the OVAE is planning to conduct a grant competition in the spring of 2007.

The Carl D. Perkins Career and Technical Education Improvement Act of 2006 (Act) (PL 109-270) (20 U.S.C.2301, et seq.), was signed into law on August 12, 2006. Section 116 (a) – (g) of Perkins authorized the Native American Career and Technical Education Program.

In the Act, Congress has expanded and added elements to the statement of purpose, most significantly by stating that, among other statutory purposes, programs should build on the efforts of States and localities to develop challenging academic and technical standards, and to assist students in meeting such standards, including student academic achievement standards, especially in preparation for the high skill, high wage, or high demand occupations in emerging or established professions. (20 U.S.C. 2301 (1)) Congress has added to the statement of purpose the requirement that programs should provide technical assistance that promotes leadership, initial preparation, and professional development, improve the quality of career and technical education teachers, faculty, principals, administrators, and counselors. (20 U.S.C. 2302 (5)) Additionally, the Act's purpose section has been amended to include supporting partnerships among schools, postsecondary institutions, baccalaureate degree granting institutions, area career technical centers, local workforce investment boards, business and industry, professional associations, and intermediaries, as well as providing career and technical education students with opportunities throughout their lives, in conjunction with other education and training programs, to attain the knowledge and skills needed in this competitive National economy. (20 U.S.C. 2301 (6) and (7))

The collection of this information is necessary to (1) make new awards with FY 2006/2007 funds and (2) manage and monitor future NACTEP grantees.

- The Office of Vocational and Adult Education (OVAE) is requesting the reinstatement of the OMB clearance under collection number 1830-0542 for the following Native American Career and Technical Education Program (NACTEP) documents and program requirements:
 - (a) Selection Criteria
 - (b) Budget Instructions for NACTEP (including budget form and budget narrative)
 - (c) Program Narrative
 - (d) Guidelines for the Appeals Process

- The Office of Vocational and Adult Education is also requesting OMB clearance under collection number 1830-0542 for the following Native American Career and Technical Education Program (NACTEP) program requirements.
 - (a) Performance/Statistical Reports
 - (b) Evaluation Reports
 - (c) Government Performance Results Act (GPRA) Submissions

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.

This information collection is seeking to reinstate specific components of the currently approved information collection under OMB Control Number 1830-0542. The original collection was for a Notice Inviting Applications to award discretionary grants under Perkins III of 1998. Due to the reauthorization of Perkins IV, OVAE will conduct a new grant competition in the spring of 2007 for the NACTEP.

The data collected on the application form will be used in various ways leading to the award of a grant. First, enough information must be available to determine the eligibility of the applicant and to determine whether the project proposed can be funded under the provisions of the appropriate statutes or regulations. Second, field reviewers use the information provided to rate the applications against published technical review

The NACTEP will expend FY 2006/2007 funds to award new grants. In order to evaluate performance, program staff will need to collect proposed goals and objectives, narratives, budget information, performance/statistical reports, evaluation reports and GPRA submissions.

The data collected from the program requirements must relate to the goals and objectives that will be included in the approved project application. NACTEP program staff will scrutinize grantees' budgets and reports to ensure that the grantees meet program objectives.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

NACTEP applicants may submit applications electronically, via Grants.Gov, and OVAE estimates that approximately twenty-five percent of applicants will submit their applications, electronically.

- 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.**

The information requested does not exist elsewhere.

- 5. If the collection information impacts small businesses or other small entities (Item 5 of 014B Form 83-1), describe any methods used to minimize burden.**

Respondents are not small businesses.

- 6. Describe the consequence of 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.**

The frequency of collection is key to the appropriation cycle. If the collection were conducted less frequently, eligible recipients would not be able to receive Federal funds to support Career and Technical Education programs.

- 7. Explain any special circumstance that would cause an information collection to be conducted in a manner.**

No such circumstances exist.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

A 30-day Federal Register Notice will be published allowing for the public to comment on this collection.

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

The respondents will not be receiving a payment nor a gift for completing the information collection. The information collection is required as part of receiving additional funding.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulations, or agency policy.

Confidentiality concerns are handled in accordance with the Privacy Act and the Freedom of Information Act. No other pledges of confidentiality are made.

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. This 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.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not make special surveys to obtain information on which to base burden estimates. Consultation with a sample of potential respondents is desirable. If the burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated burden and explain the reason for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

We estimate that the Department will receive approximately 80 new applications for awards under the Native American Career and Technical Education Program (NACTEP). Additionally, it is estimated that the applicants will spend 120 hours developing their grant applications, and the total respondent burden will be 9,600 hours. Based on the average preparation time of 120 hours per response, it is estimated that 100 hours would be used for review, research, gathering information, etc. The remaining 20 hours would be used for typing, xeroxing, and submission.

Once the five-year grants are awarded, the burden hours will be significantly reduced, because grantees will only need to submit narrative goals and objectives, budget information, performance data, GPRA, and evaluation reports. As a result, the amount of time for grantees and program staff will be significantly decreased.

<u>Program Year</u>	<u>Estimated Number of Responses</u>	<u>Type of Staff</u>	<u>Estimated Number of Burden Hours Per Response</u>	<u>Total Estimated Number of Burden Hours</u>
2007-2008	80	Professional Clerical TOTAL	100 20 120	8,000 1,600 9,600
2008-2009	30	Professional Clerical TOTAL	30 20 50	900 600 1,500
2009-2010	30	Professional Clerical TOTAL	30 20 50	900 600 1,500
TOTAL	140		220	12,600
ANNUAL AVERAGE	47		73	4,200

- **If the request for approval is for more than one form, provide separate burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-1.**

The request for approval is for one form.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. 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.**

The estimated cost to respondents to develop applications, in response to the Notice Inviting Applications, is approximately \$219,200 based upon an average hourly rate of \$25.00 per professional and \$12.00 per clerical. Based on the average preparation time of 120 hours per response, it is estimated that 100 hours would be used for review, research, gathering information, etc. The remaining 20 hours would be used for typing, formatting, and copying.

The estimated cost to respondents, to submit semi-annual and annual performance reports, is approximately \$29,700 based upon an average hourly rate of \$25.00 per professional and \$12.00 per clerical. Based on the average preparation time of 50 hours per response, it is estimated that 30 hours would be used for review, research, gathering information, etc. The remaining 20 hours would be used for typing, formatting, copying, and submitting the performance reports through the Department's e-Reports system.

13. Annual Costs to Respondents (capital/start-up & operation and maintenance).

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. Computers 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 information is zero. The information collection will not create costs associated with generating, maintaining, and disclosing or providing the information that is not already identified in question 12 of this supporting statement.

14. Provide estimates of annualized cost to the Federal government.

The Federal costs are estimated to be approximately \$146,067. This includes the salaries and expenses of program staff that manage the grants and other Department staff to support the grant competitions. The method used to estimate the cost is as follows:

Program Office Staff

2 GS-12 X 46 weeks = \$49,067

TOTAL = \$49,067

Other Department Staff = \$ 7,000

Outside Review Cost = \$90,000

TOTAL ESTIMATED FEDERAL COST = \$146,067

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

Per the instructions for completing OMB Form 83-i, given the passage of reauthorized federal legislation, this is considered a reinstatement of a previously approved collection. Consequently, the entire 9,600 hours will be considered new burden and recorded as a program change.

The extension and clearance of 1830-0542 will allow for the development and submission of new applications, holding a peer review, conducting clarification activities for the and Native American Career and Technical Education Program, as well as the appeals process for the NACTEP. The current OMB inventory is \$0. We estimate the cost to respondents to be \$219,200.

Additionally, OVAE is requesting the extension and clearance of 1830-0542 to collect semi-annual and annual performance data, including GPRA and evaluation reports.

- 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 information, completion of report, publication dates, and other actions.**

There are no plans for publication of data from this collection.

- 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 Item "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I**

This request is in compliance with 5 CFR 1320.9.

B. Collections of Information Employing Statistical Methods:

Not applicable