

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

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

America's Career Resource Network (ACRN) is authorized under Section 118 of the Carl D. Perkins Vocational and Technical Education Act of 1998 (PL 105-332). Under that section, the Secretary of Education is authorized to award grants to entities jointly designated by the Governor and vocational education agency to enable State designated entities to carry out mandated State level activities. The Secretary is also required to prepare and submit to the appropriate committees of the Congress an annual report that includes: (1) an identification of activities assisted under section 118 during the prior year; (2) a description of the specific products and services assisted under section 118 that were delivered in the prior program year; and (3) an assessment of the extent to which States have effectively coordinated activities assisted under this section with activities authorized under section 15 of the Wagner-Peyser Act. The law also requires that the National ACRN entity disseminate information that promotes the replication of high quality practices as performed by State ACRN entities.

The Department has been collecting required information since Program Year 2000. The Department has developed and tested an electronic system that is both user-friendly and that contains questions that allow respondents to provide more complete responses.

2. Indicate how, by whom, and for what purposes 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.

Information is used by Departmental managers and project officers: (1) to develop the required annual report to the Congress; (2) to monitor State activities for compliance; and (3) to identify high quality practices for dissemination among the States, as required by the law. The system preloads contact and fiscal information, replaces with check lists several elements that required data entry, provides additional space for narrative answers where appropriate, and allows printing of data organized by State, region or nation.

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. Also describe any consideration of using information technology to reduce burden.

The electronic reporting system allows States to report on a standard format through the OVAE/ACRN website. All contact and fiscal information is preloaded. Drop down

menus are provided to limit unnecessary typing. Additional space is provided for narrative answers. When tested, states reported the format more complete, easier to fill out, and requiring less time. States also felt they were able under the format to provide a more complete and fair report of what they do.

State reports are fed directly into a spreadsheet that provides State, regional and national summaries.. The reports, once filed, can be downloaded and printed and, thus, may be made part of the State program files used by project officers to monitor performance. The national summaries will be especially helpful when preparing the annual Report to the Congress.

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

Program information submitted by State ACRN entities is not submitted by or collected by any other organization.

5. If collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Collection of this information has no impact on small businesses or other small entities beyond the State ACRN entities themselves.

6. Describe the consequences 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.

If the information required under the proposed report were not collected, the Secretary of Education would be unable to confirm whether the mandates of section 118 are being fulfilled. Absent the collection of such information, the Secretary would be unable to comply with statutory reporting requirements or the requirement to identify and disseminate "high quality practices."

7. Explain any special circumstances that would cause 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 that can be generalized to the universe of study;

Requiring the use of 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 inconsistent with the pledge, or which unnecessarily impedes sharing of data with other agencies or 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.

A written statement may be required in less than 30 days if an incident of potential grantee fiscal mismanagement is identified and an immediate explanation is required.

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. Specifically address comments received on cost and hour burden.

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 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.

Sixty and 30-day Federal Register notices will be published allowing the public to comment.

The Department recognized that some of the subject matter reported needs a more detailed explanation if high quality practices are to be identified and disseminated. As a result, the Department has developed and tested the reporting system that is herewith submitted for extension.

The collection that is here submitted for OMB extension has addressed the system to make it more user friendly, to meet the needs of respondents, and to provide information by which identification of high quality practices may be facilitated.

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

The Department will provide no gifts to respondents beyond remuneration of grantees.

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

No assurance of confidentiality will be provided to respondents. Information received from grantees through this reporting system will be made publicly available on the OVAE/ACRN website.

11. Provide additional justifications 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.

No questions of a personal or sensitive nature are included among the elements.

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 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 the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

Provide estimates of annualized cost to respondents of 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.

In 2002 the Department conducted a Beta-test of the system. Time and cost reports gathered through discussion with 5 respondents who participated in the Beta-test indicate the information reported is collected as part of management operations. The parties completing the report were without exception the Project Directors. No clerical staff was involved. The time taken to complete the report varied from 1 to 16 hours. The average of the reported hours was 6.2 hours.

The party reporting 16 hours stated that she encountered “ubiquitous interruptions” while filling out the report. She also indicated that the time taken to complete the report would have been substantially reduced if her management records had been better organized. If her experience is treated as an exception, the hours taken to review records and fill out the form averaged 3.75 hours. The following estimates are based on a range of 4 to 6 hours. The estimated annual burden should not change from year to year.

(1) Estimated annual burden hours *per collection*.

Program Funding Year	Estimated Number of Responses	Type of Staff	Estimated Number of Burden Hours Per response	Total Estimated Number of Burden Hours
2007-2008	59	Professional	4 to 6 hrs.	236-354 hrs.

This extension is to cover the last annual report the grantees will submit. Therefore there is a reduction in the burden hours from 708 to 354.

(2) Annualized costs to respondents *per collection*.

Program Funding Year	Estimated Number of Responses	Type of Staff	Estimated Number of Hours Per Response	Estimated Cost Per Hour	Total Estimated Cost
2007-2008	59	Professional	4-6 hrs.	\$25.00	\$5,900 to \$8,850

Since there will only be one collection the costs associated with this collection are reduced from \$17, 700 to \$8, 850.

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) 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 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 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), 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 business or private practices.

Start up costs are zero, since this program has been in existence since June, 2000. All information collection activities and all equipment used in reporting are part of operating costs related to performance of statutory activities. For example, the titles of all products developed, the numbers printed, the numbers disseminated, the organizations to which they are disseminated, and the recipients to whom these resources are targeted are all part of day-to-day ACRN planning, budgeting and implementation. The same is true of training. The subjects in which training is planned and delivered, the parties to whom it is directed, the number and kind of individuals attending, and the quality of participant evaluations received is information generated for program management purposes. The computers on which management information is stored are used both for project management and the development and dissemination of information to targeted users. Costs of reporting to the Federal government on grantee program activity are, as a result, related not to the collection, but to the organizing and analyzing of data generated by and collected for program management purposes.

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 costs (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.

Annual cost to the Department of managing this reporting system is estimated at \$14,400. Expenses include: 1) the development and issuance of reporting instructions and 2) answering grantee questions, following-up late reports, and asking questions about unclear answers. The reporting form is accessed by respondents via the OVAE/ACRN web site. State reports are electronically entered into a spreadsheet recoverable from the web site. The annual cost of managing the web-based reporting system is estimated at \$10,000. Phone calls are covered by overhead apportioned to the ACRN account.

1) <u>Preparation of announcements & instructions</u>	
40 Hours @ \$50/hour =	\$ 2,000
2) <u>Answering grantee questions, etc.</u>	
80 hours @ \$30/hour =	\$ 2,400
3) <u>Management of the electronic system =</u>	<u>\$10,000</u>
Total	\$14,400

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1

There is a reduction in burden because this information will be collected once for the final report. Under the previous approval the information was collected twice, semiannually and annually.

16. For collections of information whose results will be published, outline plans for tabulations 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 reports, publication data, and other actions.

Annual State reports will be made available on the ACRN web site managed by the Office of Vocational and Adult Education.

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

The Department does not seek such approval.

18. Explain each exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Submissions," of OMB Form 83-1.

This collection of data does not contain a proposed regulation.