

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 request is to revise the information collection package 1830-0503 (Carl D. Perkins Vocational and Technical Education Act of 1998; (20 U.S. C. §§ 2301) P.L. 105-332 (Perkins III) -- Annual Performance and Financial Reports) that is used to collect annual narrative and financial information from the States, as well as to gather annual performance data to determine whether the States have met their agreed upon performance levels for each of the core indicators of performance in the Perkins III legislation. With the reauthorization of Perkins III legislation as the Carl D. Perkins Career and Technical Education Act of 2006; (20 U.S.C. §§ 2301) P.L. 109-270 (Perkins (IV)). With the continued emphasis of the importance of accountability for performance and aligning more closely the secondary academic attainment and graduation measures to those required of all students under the Elementary and Secondary Education Act (ESEA) as amended by the No Child Left Behind (NCLB) Act. The Department will gather data on three student outcomes (i.e. secondary academic attainment in reading/language arts, student academic attainment in mathematics, and student graduation rates) included in Perkins IV. In the Perkins IV legislation the student outcomes will be core indicators of performance in the subsequent program years. Three revisions are requested as follows:

Revision #1: Require States to report disaggregated data. States will report data within the 16 career cluster areas by gender, ethnic and special population categories on the Basic Grant and Tech Prep student enrollment forms.

This revision is being made in response to comments and suggestions from States during annual beta testing of the Annual Performance Report. States indicated that it would be helpful to have information on student enrollment in each of the 16 career cluster areas disaggregated by gender to identify whether, and to what extent, students were enrolling in career and technical education (CTE) areas that are non-traditional for their gender. Addressing possible gender imbalances in CTE is one goal of the Perkins legislation. To address this revision, modifications were made to the Student Enrollment Instructions (Steps 1 and 2) on page 15 of the Annual Performance Report.

Revision #2: Require States to report on three student outcomes that will be mandated as indicators of performance in future years: academic attainment in reading/language arts, academic attainment in mathematics, and graduation rate.

This revision is being made in order for States to provide performance data on three student outcomes that are required core indicators of performance under the newly-reauthorized Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV), which will first

be effective for the States program years 2007-08. The Department will use these data as baseline data for the three student outcome core indicators of performance for program years 2006-07 collected in December 2007. Therefore, States will not be held accountable for not meeting these performance levels until program years 2007-08 collected in December of 2008. Perkins IV requires a State to report on the number or percent of its CTE students who score at the proficient level or above on the State's No Child Left Behind (NCLB) assessments for reading/language arts and mathematics, and CTE students' graduation rate, as defined in NCLB. [See section 113(b)(2)(A)(i) and (iv) and 113(c). The Department's general authority for collecting and disseminating information in section 431 of GEPA (20 U.S.C. 1231(c) and the transition authority in section 4 of Perkins IV allow the Secretary to collect data to examine program performance over time and to assist the Department in making the transition from Perkins III to Perkins IV. To address this revision, modifications were made on pages 1 and 22-24 of the Annual Performance Report.

Revision #3: Clarify instructions in the Accountability Nontraditional Performance Reporting and include helpful cell mouse rollover pop-ups for users in the Web-based data collection forms.

This revision is being made in response to comments and suggestions from States during annual beta testing of the Annual Performance Report. No changes were necessary in the Annual Performance Report to address this revision.

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.

The Division of Academic and Technical Education, Office of Vocational and Adult Education, reviews States' annual performance reports to determine compliance with Perkins III and the Education Department General Administrative Regulations (34 CFR Parts Part 80.40 [Annual Performance Report] and 80.41 [Financial Status Report]). Under Sec. 123 of Perkins III, States unable to meet the adjusted levels of performance in Section 113 must develop and implement program improvement plans for the subsequent year in order to avoid a sanction under Section 113(d). The Workforce Investment Act (WIA -- P.L. 105-220) provides incentive awards for States that exceed their performance levels established in their State plans. The Department will use the information reported to determine whether performance levels have been exceeded and to determine each State's eligibility for these awards. The Department will also use the student enrollment and outcome information to help review program effectiveness by providing information on student program participation trends and providing context on all students who participate, regardless of their level of participation, as opposed to only students who are concentrators, and which are the focus of the core indicators of performance in the statute and for policy analysis and for responding to inquiries from members of Congress and others.

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.

The Department requires eligible agencies to submit Annual Performance Reports electronically through e-mail or Web-based templates. In addition, the Division of High School, Postsecondary and Career Education has established a listserv for State Directors of Career and Technical Education and other agency officials who are involved in the preparation and submission of Annual Performance Reports. One purpose of the listserv is to reduce the burden associated with this information collection by enabling State officials to share ideas and strategies for continuous improvement efforts identified from the data gathered in this Annual Performance Report.

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.

This information is not required to be submitted, to any other unit in the Department of Education.

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.

This collection does not impact small business.

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 Department of Education could not release funds to the States if the information collection was not carried out. Without this collection the Department of Labor would not be able to determine States' eligibility for the awarding of incentive grants (WIA Section 503). The statute dictates the frequency of collection and the types of information that must be collected.

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

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

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.

The Department consulted with eligible agencies concerning these revisions to this collection in several meetings and beta testing that occurred during 2006. Additionally a 30-day and 60-day Federal Register notice will be published inviting the public to comment on burden.

This information collection is collecting race/ethnicity data on an aggregated level and therefore, will adopt ED's guidance and timeline on race/ethnicity once this guidance is finalized.

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

The respondents will not receive any payment or gift for completing the information collection.

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 according to provisions in 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.**

The Department receives 54 annual responses on the Perkins Annual Financial and Performance Report. Current OMB inventory on this collection is at 6,120. Due to the increased reporting requirements we are requesting an additional burden of 4,680 hours. It is estimated that the each eligible entity will spend 200 hours to finalize their submission to the Department, and the total respondent burden will be 10,800 hours. Based on the average preparation time of 200 hours per response, it is estimated that 120 hours would be used for

review, research, gathering information, etc. The remaining 80 hours would be used for typing, processing, and submission.

Program Year	Estimated Number of Responses	Type of Staff	Estimated Number of Burden Hours Per Response	Total Estimated Number of Burden Hours
2006-2007	54	Professional	120	6480
		Clerical	80	4320
		TOTAL	200	10800
TOTAL	54		200	10,800
ANNUAL AVERAGE	54		-----	----

- **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 is approximately \$94,160 based upon an average hourly rate of \$19.25 per professional and \$7.98 per clerical. Based on the average preparation time of 200 hours per response, it is estimated that 120 hours would be used for review, research, gathering information, etc. Remaining hours would be used for typing and photocopying.

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 are not included in this estimate.

The total operation and maintenance and purchase of service components for this information is zero. The information collection will create minimum cost to the States generating, maintaining, and disclosing the information.

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

The Federal costs are estimated to be approximately \$94,160. This includes contractor beta testing and web site maintenance, and the salaries and expenses of program staff who manage the process. The method used to estimate the cost is as follows:

Program Office Staff:

1 GS-12 (\$ 31p.h.)	X 11 weeks	=	\$ 13,640
1 GS-13 (\$ 37p.h.)	X 5 week	=	\$ 7,400
2 GS-12 (\$ 31p.h.)	X 5 week	=	\$ 6,200
1 GS-13 (\$ 37p.h.)	X 6 weeks	=	\$ 8,880
2 GS-12 (\$ 31p.h.)	X 10 weeks	=	\$ 12,400
1 GS-14 (\$ 43p.h.)	X 4 weeks	=	\$ 6,880
1 GS-14 (\$ 43p.h.)	X 8 weeks	=	\$ 13,760
TOTAL PROGRAM		=	\$ 69,160
Other Department Staff		=	\$ -----
Contractor		=	\$ 25,000
TOTAL ESTIMATED FEDERAL COST		=	\$ 94,160

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 83-1, this is a revision of the current data collection form. The increase of 4,680 hours reflects the revisions that were made in part in response to comments and suggestions from eligible agency personnel and beta testing, who pointed out areas in which the instrument was unclear or confusing. Although there were reductions in burden for portions of the application that were clarified or streamlined (as identified under #1), there is an increase of 4,680 hours due to the increased level and detail of the additional three data submissions on student outcomes and disaggregated enrollment data. The 4,680 hour increase is recorded on the 83i on item 13f as a program change.

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.

An annual report to Congress is prepared and published using the information collected in the Annual Performance Report instrument.

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