

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.**

The Tech Prep Demonstration Grants Program was authorized under Section 207, Title II of the Carl D. Perkins Vocational and Technical Education Act of 1998 (PL 105-332). Under Section 207 the Secretary was authorized to award grants on a competitive basis to consortia consisting of postsecondary and secondary education institutions, public and private organizations and agencies, and businesses, to carry out tech prep education programs that involve the location of a secondary school on the site of a community college.

Funds for this program were appropriated from FY 2001 through FY 2005. This program is a discretionary grant program that falls under the Streamlined Clearance Process for Discretionary Grant Information Collections, 1890-0001.

This collection makes no changes to the previously approved collection.

- Requires applicants to submit annual performance goals for the proposed TPDP project for each of the required performance indicators, per OMB's direction;
- Revises the evaluation requirement; and
- Modifies the selection criteria under Project Design and Evaluation.

- 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 information collected under the current collection was used to award discretionary grants. It was also used to require the submission of annual performance goals and annual performance data for the required performance indicators in annual evaluations and annual performance reports. The information to be collected will continue to be used by OVAE staff to require the submission of annual performance goals and annual performance data for the required performance indicators in annual evaluations and in the OMB-approved ED 524B annual performance report.

- 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.

All ED 524B instructions, forms and materials will be available electronically and may be downloaded directly from the Department's e-Grants system. Tech Prep Demonstration grantees will submit the ED 524B electronically via the Department's e-Grants system.

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.

Collection of the information is required to assess the performance of Tech Prep Demonstration grantees. The information needed is not submitted to any other unit in the Department of Education.

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.

This information collection will not have a significant economic impact on a substantial number of small businesses.

6. Describe the consequences to 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.

Approval for the collection will expire on April 30, 2008. Without approval to extend this collection, OVAE would be unable to require the submission of annual performance goals and annual performance data for the required performance indicators in the ED 524B.

7. Explain any special circumstance that would cause an 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 a 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 consistent 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.**

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. 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 of those 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.

OVAE invited public comment through a Notice of proposed requirements and selection criteria on April 14, 2005, but did not receive any comments on the performance indicators requirement. However, we will publish 30-day Federal Register Notices to allow public comment. The frequency of collection, instructions, record keeping requirements, disclosure and annual performance reporting formats are based on standard instructions for discretionary grant programs.

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

The Department will not provide gifts or payment to respondents other than remuneration of grantees.

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 assurances 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 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.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB-I.**
- **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.**

Estimates gathered through discussion with an internal task force of representatives from various program offices indicate the following estimated annual hour burden:

(1) Estimated annual burden hours:

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	25	Professional Clerical Total	50 14 64	1250 350 1600
2008-2009	25	Professional Clerical Total	50 14 64	1250 350 1600
2009-2010	11	Professional Clerical Total	50 14 64	550 154 704
Total	61		192	3904
Annual Average	20		64	1301

(2) Annualized costs to respondents:

Program funding year	Estimated number of responses	Type staff	Estimated number hours per response	Estimated cost per response	Total estimated costs
2007-2008	25	Professional @ \$25 per hour Clerical @ \$10 per hour Total	50 14 64	\$1250 \$140 \$1390	\$34,750
2008-2009	25	Professional @ \$25 per hour Clerical @ \$10 per hour Total	50 14 64	\$1250 \$140 \$1390	\$34,750

2009-2010	11	Professional @ \$25 per hour	50	\$1250	
		Clerical @ \$10 per hour	14	\$140	
		Total	64	\$1390	\$15,290
Total	150			\$4170	\$84,790
Annual Average	50			\$1390	\$28,263

Please note that we placed the already-approved standard forms included in this grant application on a separate file.

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 the 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 of 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 and usual business or private practices.

The total capital and start-up costs for this collection are zero. The information collection will not require the purchase of any capital equipment or create any start-up costs. Computers and hardware used to complete this information collection are part of the respondents' customary and usual business or private practices.

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 expenses (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.

Estimated annual costs to the Federal government include the following.

Program funding year	Preparing information collection (annual reports package for e-Grants)	Printing submitted ED 524Bs, annual evaluations	Staff review of information collection (submitted ED 524Bs, annual evaluations)	Total
2007-2008	Professional @ \$30 for 16 hrs = \$420	Support staff @ \$15 for 12 hrs = \$180	Professional @ \$30 for 100 hours \$3,000	
	Total \$420	Total \$180	Total \$3,000	Total \$3,600
2008-2009	Professional @ \$30 for 16 hrs = \$420	Support staff @ \$15 for 12 hrs = \$180	Professional @ \$30 for 100 hours - \$3,000	
	Total \$420	Total \$180	Total \$3,000	Total \$3,600
	Professional @		Professional @ \$30 for	

2009-2010	\$30 for 16 hours - \$420	Support staff @ \$15 for 6 hrs = \$90	50 hours - \$1,500	
	Total \$420	Total \$90	Total \$1,500	Total \$2,820
Total	\$1,260	\$450	\$7,500	\$10,020
Annual average	\$420	\$150	\$2,500	\$3,340

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

The adjustments reflect the time it will take to collect data, establish annual performance goals for the required performance indicators, and prepare and submit the ED 524B. The decrease in estimated annual burden and costs in 2009-2010 are due to the anticipated closeout of 14 Cohort 2 Tech Prep Demonstration projects funded in 2003.

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 of information, completion of report, publication data, and other actions.

Results of this collection will not be published.

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

The Department is not seeking this approval.

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