

## 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 package—the Consolidated Annual Report (CAR)—is to gather narrative, financial, and performance data as required by the newly reauthorized Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) (20 U.S.C. 2301 *et seq.* as amended by P.L. 109-270). Section 113(c) of Perkins IV requires each eligible agency that receives an allotment under section 111 of Title I of the Act (State basic grant) to annually prepare and submit to the Secretary a report regarding the progress of the State in achieving the State adjusted levels of performance on the core indicators of performance and additional indicators of performance, including the levels of performance for special population categories described in section 3(29) of Perkins IV and other student categories described in section 1111(h)(1)C(i) of the Elementary and Secondary Education Act of 1965, as amended by the No Child Left Behind Act (NCLB) of 2001. Finally, section 205 of Perkins IV requires each eligible agency that receives a tech prep allotment under section 201 of Title II of the Act (tech prep grant) to annually prepare and submit to the Secretary a report on the effectiveness of these programs, including a description of how tech prep grants were awarded within the State. The CAR is a single reporting instrument that combines the requirements referenced above with the required annual interim and final financial status reports pursuant to the Education Department General Education Regulations (EDGAR) in 34 CFR §80.41.

Perkins IV, signed into law on August 12, 2006, represents nearly three years of work on the part of Congress and the Department, in cooperation with other Federal agencies and the State and local agencies affected by its policies, to provide continuing Federal support for rigorous career and technical education (CTE) programs that provide students with knowledge and skills to keep the United States competitive. The Department distributes approximately one billion dollars annually in Perkins funding to the 50 States, the District of Columbia, Puerto Rico, and the outlying areas, such as Guam, Palau, and the Virgin Islands, collectively referred to as the “States”. Each State distributes funds to eligible recipients, such as local educational agencies (LEAs) and postsecondary institutions, to develop more fully the academic and career and technical education knowledge and skills of secondary and postsecondary education students who elect to enroll in career and technical education programs. Perkins IV indicates that one of its purposes is to build on the work of States to assist CTE students to achieve challenging academic and technical standards, and be prepared for high skill, high wage, or high demand occupations in current or emerging professions. Perkins IV provides increased focus on the academic achievement of CTE students, improvement in State and local accountability, and strengthened connections between secondary and postsecondary education delivery systems. These themes serve as the general framework for the revised CAR instrument.

This package replaces OMB #1830-0503, Consolidated Annual Performance, Accountability, and Financial Status Report for the State Basic Grant and Tech-Prep Grant Programs under the Carl D. Perkins Vocational and Technical Education Act of 1998 (Perkins III), which expired on April 2008.

**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 gathered through this package will be used in a variety of ways. First, narrative and financial information will be reviewed by the Office of Vocational and Adult Education (OVAE), Division of Academic and Technical Education (DATE), to determine each State's compliance with basic provisions of Perkins IV and the Education Department General Administrative Regulations (34 CFR Part 80.40 [Annual Performance Report] and Part 80.41 [Financial Status Report]). For example, States are required to implement specific leadership activities in their State and to spend certain percentages of their funding to meet the academic and technical skill needs of various student populations (for example, individuals preparing for nontraditional careers and individuals in State institutions).

Second, DATE staff will review performance data to determine whether, and to what extent, each State has met its State adjusted levels of performance for the core indicators described in section 113(b)(4) of Perkins IV. A State that did not meet at least 90 percent of the adjusted levels of performance for any of the core indicators described in section 113(b)(4) of Perkins IV is required to develop and submit as part of its CAR report a program improvement plan with special consideration to the performance gaps identified under section 113(c)(2) of Perkins IV. The improvement plan must address each core indicator(s) that a State failed to meet by at least 90 percent; disaggregated categories of students for which there were quantifiable disparities or gaps in performance compared to all students or any other category of students; actions steps that will be implemented, beginning in the current program year; staff member(s) in the State who are responsible for each action step; and the timeline for completing each action step. DATE staff will review these plans to determine whether they are thorough and appropriate in addressing the indicator(s) that were not met at the 90 percent level.

Third, section 113(c)(3)(C) of Perkins IV requires the Secretary to provide the appropriate committees of Congress copies of annual reports received by the department from each eligible agency that receives funds under the Act. Section 113(c)(3)(A) further requires the Secretary to make the information contained in such reports available to the general public. To meet this obligation, DATE compiles the CAR data into an annual report to Congress and makes the data available to the public online through the Peer Collaborative Resource Network at [www.edcountability.net](http://www.edcountability.net).

Fourth, DATE sets annual performance targets for each of the core indicators of performance in section 113(b) to chart its own progress in helping States to improve the educational and employment outcomes for students who pursue career and technical education. Targets and performance data are entered annually into the Department's Program and Performance Management Database (PPMD)

Finally, DATE staff uses annual CAR information for to determine which States will be monitored for an upcoming year or which States could benefit from technical assistance in particular areas. Annual CAR reviews have resulted in the identification of topics for annual Data Quality Institutes (DQIs), as well as the decision to offer customized technical assistance to States on accountability issues—a strategy that has been well-received by the States and determined to be effective by OVAE in improving the reliability and validity of the Perkins data.

**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.**

Each State has several options in submitting its CAR report. A State may submit its report electronically via the Department’s CAR Web site at [www.PerkinsCAR.com](http://www.PerkinsCAR.com). This Web site allows a State to complete its CAR report using Web-based or Excel forms and to certify to the accuracy and completeness of its submission using electronic Personal Identification Numbers (PINs) supplied to the State by the Department. The State CTE director must use one PIN to certify and sign the entire CAR submission. The authorized State official responsible to certify and sign Financial Status Reports (FSR) must use another PIN. It is important to note that the use of the PINs to certify and sign the CAR and FSRs is the same as certifying the documents with a hand-written signature by the responsible State official. State officials are responsible for protecting the confidentiality of their PIN and for any use of their PIN by another individual. Under Perkins III, each States and territory, except the Virgin Islands, made an electronic submission. DATE plans to encourage this option for submitting the CAR under Perkins IV..

Alternatively, a State may submit its report via an e-mail attachment to a Perkins CAR mailbox at [PerkinsCAR\[insert year\]@ed.gov](mailto:PerkinsCAR[insert year]@ed.gov). A State that chooses this option must e-mail a signed pdf version of the report to the mailbox and send paper copies of any pages requiring a certification and signature to the address below.

Finally, a State may opt to make a paper copy submission. A State that chooses this option must send a certified and signed original and one copy of the report to the address specified in the information package.

**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 gathered as part of this collection is not required to be submitted to any other office within the Department of Education. That said, efforts are underway to collect the performance data gathered as part of the CAR through the Education Department Exchange Network (EDEN) system. At present, however, the EDEN system only gathers information from secondary educational agencies and roughly half of the State agencies that receive Perkins funding and report data are postsecondary or workforce development agencies.

- 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.**

Without the information gathered through the CAR, the Department would be unable to determine whether, and to what extent, States were complying with the Perkins IV legislation or other applicable federal regulations. The Department would be unable to sufficiently review the progress of each State in meeting its adjusted levels of performance, much less determine its own effectiveness in helping States to achieve the purposes of the Act. 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 inconsistent with the guidelines I 5 CFR 1320.6.**

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.**

This section is not applicable at this time.

- 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.**

Section 113(c) of Perkins IV requires each eligible agency that receives an allotment under section 111 of Title I of the Act (State basic grant) to annually prepare and submit this report to the Secretary. Eligible agencies include all 50 States, District of Columbia, Puerto Rico, U.S. Virgin Islands, Palau, and Guam. It is estimated that each eligible agency will spend an average of 200 hours to finalize their submission to the Department, and the total annual average respondent burden hours will be 11,000 hours. Of the total annual 11,000 hours, it is estimated that an average of 360 hours would be used for reviewing, researching, and compiling information, while an average of 240 hours would be used for typing, processing, and submitting the information.

<b>Program Year</b>	<b>Estimated Number of Responses</b>	<b>Type of Staff</b>	<b>Estimated Number of Burden Hours Per Response</b>	<b>Total Estimated Number of Burden Hours</b>
2007-2008	55	Professional	80	4400
		Clerical	60	3300
		TOTAL	140	7700
2008-2009	55	Professional	140	7700
		Clerical	90	4950
		TOTAL	230	12650
2009-2010	55	Professional	140	7700
		Clerical	90	4950
		TOTAL	230	12650
<b>ANNUAL AVERAGE</b>	<b>55</b>		<b>200</b>	<b>11,000</b>

- **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 total estimated annual average cost over the six-year period is \$137,286 for 55 respondents. This amount is based upon an average hourly rate of \$25.00 per professional and \$10.00 per clerical staff person, with an average preparation time of 200 hours.

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

There are no costs to respondents for the capital and start-up cost components for this information collection. 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.

There are also no costs to respondents for the total operation and maintenance and purchase of service components for this information.

The information collection will create minimum cost to the States to generate, compile, maintain, and disclose the information.

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

The annual cost to the Federal government to implement this information collection is estimated at \$45,762. This includes contractor beta testing and web site maintenance, and the salaries and expenses of DATE program staff who manage the process and review the CAR data. The method used to estimate the annual cost is as follows:

Program Office Staff:

1 GS-12	X	240 hours	= \$ 7,378
2 GS-14	X	80 hours	= \$ 3,033
1 GS-15	X	120 hours	= \$ 5,351

Total Program Office Staff: = \$15,762

Contractor Staff: = \$30,000

ESTIMATED FEDERAL COST = \$45,762

**15.) Explain the reasons for any program changes or adjustments reported in Items 13**

or 14 of the OMB Form 83-I.

This is a new collection.

- 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 CAR instrument. Below is the general schedule for production:

<b>Task</b>	<b>Timeline</b>
States submit CAR data	December 31 (deadline for reporting each year)
DATE staff review State's CAR submissions	January 1 – March 15
States receive notification on the approval of their CAR submissions	March 15
DATE staff, in collaboration with contractors, tabulate data and prepare individual State profiles	March 15 – April 15
DATE staff develops draft report	May 15
DATE staff submits final draft report for Department clearance	June 1
DATE staff submits final report for Office of Communications and Outreach for final editing and printing	June 30
DATE staff submits final report to Congress	July 15

- 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.