

## 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 collect semi-annual and final performance data from the current cohort of Native American Vocational and Technical Education Program (NAVTEP) grantees, which were originally funded in FY 2001, and whose final project year is FY 2007.

Per OMB guidance, we are collecting these data as part of a separate clearance so that the public is allowed both 60-day and 30-day public comment periods. We are submitting this request for OMB approval under 1830-0566 as we had previously collected these data under OMB Control Number 1830-0542.

- Under 1830-0566, we will collect the following Native American Vocational and Technical Education Program (NAVTEP) documents and program requirements:
  - (a) Budget form and budget narrative
  - (b) Performance/Statistical Reports
  - (c) Evaluation Reports
  - (d) 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.**

The NAVTEP program used FY 2005 funds to award currently funded NAVTEP grantees their final year of funding. In order to evaluate performance, program staff will need to continue to collect budget information, semi-annual/ final performance/statistical reports, evaluation reports and GPRA submissions, after receiving OMB clearance.

Grantees are required to submit data relating to the goals and objectives that were included in the approved project application. The budget and reports are scrutinized by program staff to ensure that the grantee has met the standard of substantial progress under the project. The purpose of this information is to determine whether or not the grant will be closed out in compliance with the terms of the original grant award.

- 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.**

OVAE requires NAVTEP grantees to submit annual and final performance reports through e-Reports, the Department's electronic performance reporting initiative.

- 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; it is specific to the projects funded by the NAVTEP.

- 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 small entities. Applications for participation under the NAVTEP program were voluntary, and respondents were aware of the requirements to submit semi-annual and annual performance reports at the time they submitted applications. Programmatic requirements were published in the *Federal Register* notice inviting applications; the notice fully explained the reporting and data collection requirements.

The Department seeks to minimize the burden on small entities through the use of the ED 524B form, a standard form used by all Department grantees to submit performance data. The form allows grantees to update information from one reporting period to the next, reporting only new and pertinent data.

Finally, a letter that describes the data to be submitted in all reports, including semi-annual/final performance reports, evaluation reports, and Government Performance Results Act (GPRA) reports is provided to respondents. The letter explains the requirements for the reports in straightforward language.

- 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 keyed to the appropriation cycle. If the collection were conducted less frequently, eligible recipients would not be able to receive Federal funds to support Vocational-Technical Education programs. If this information collection is not approved, the Department will not have a mechanism for collecting the semi-annual and final performance reports required under EDGAR.

- 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 60-day and 30-day notice soliciting public comment on the burden will be published in the Federal Register.

- 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 the terms of their grant award.

- 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 for the NAVTEP program performance requirements, all 30 current grantees will submit information.

<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>
2004-2005	31	Professional Clerical TOTAL	25 (x 31 grantees) 15 (x 31 grantees) 40 (x 31 grantees)	= 775 = 465 = <b>1240</b>
2005-2006	30	Professional Clerical TOTAL	25 (x 30 grantees) 15 (x 30 grantees) 40 (x 30 grantees)	= 750 = 450 = <b>1200</b>
2006-2007	30	Professional Clerical TOTAL	25 (x 30 grantees) 15 (x 30 grantees) 40 (x 30 grantees)	= 750 = 450 = <b>1200</b>
<b>TOTAL</b>	<b>91</b>		<b>120</b>	<b>3640</b>
<b>ANNUAL AVERAGE</b>	<b>30</b>		<b>40</b>	<b>1213</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 estimated cost to respondents is approximately \$20,983.50 based upon an average hourly rate of \$21.75 per professional and \$10.38 per clerical. Based on the average preparation time of 40 hours per response, it is estimated that 25 hours would be used for review, research, gathering information, etc. The remaining 15 hours would be used for typing, formatting, and copying.

### **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 \$16,000. This includes the salaries and expenses of program staff that manage the grants. The method used to estimate the cost is as follows:

Program Office Staff

2 GS-12 X 5 weeks = \$ 15,200

Other Department Staff = \$ 800

TOTAL = \$ 16,000

TOTAL ESTIMATED FEDERAL COST = \$16,000

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