

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 Native Hawaiian Career and Technical Education Program (NHCTEP) is a discretionary grant program that provides financial assistance to projects that offer career and technical education training and related activities for the benefit of Native Hawaiians. Previously, eligible program applicants were organizations primarily serving and representing Native Hawaiians that were recognized by the Governor of the State of Hawaii. In December 2001, the Governor recommended and the Department of Education accepted ALU LIKE, Inc. of Honolulu, as the sole grantee, for 5-year-funding under the NHCTEP.

However, new legislation, the Carl D. Perkins Career and Technical Education Act of 2006 (the Act or Perkins IV), (PL 109-270) (20 U.S.C.2301, et seq.), was signed into law on August 12, 2006. Section 116 (h) of the Act authorized the Native Hawaiian Career and Technical Education Program. The new Act deleted the provision requiring the Secretary to make awards to Native Hawaiian entities recommended by the governor of Hawaii. Thus, the Department is now required to establish a competition to select recipients under this program. Eligible applicants for 2-year-funding are Native Hawaiian community-based organizations primarily serving and representing Native Hawaiians to plan, conduct, and administer programs, or portions thereof, which are authorized by and consistent with the provisions in section 116 of the Act. Native Hawaiian Community-based Organizations means any organizations that are composed primarily of Native Hawaiians from a specific community and that assists in the social, cultural, and educational development of Native Hawaiians in that community.

In Perkins IV, Congress has expanded and added elements to the statement of purpose, most significantly by stating that, among other statutory purposes, programs should build on the efforts of States and localities to develop challenging academic and technical standards, and to assist students in meeting such standards, including student academic achievement standards, especially in preparation for the high skill, high wage, or high demand occupations in emerging or established professions. (20 U.S.C. 2301 (1)) Congress has added to the statement of purpose the requirement that programs should provide technical assistance that promotes leadership, initial preparation, and professional development, improve the quality of career and technical education teachers, faculty, principals, administrators, and counselors. (20 U.S.C. 2302 (5)) Additionally, the Act's purpose section has been amended to include supporting partnerships among schools, postsecondary institutions, baccalaureate degree

granting institutions, area career technical centers, local workforce investment boards, business and industry, professional associations, and intermediaries, as well as providing career and technical education students with opportunities throughout their lives, in conjunction with other education and training programs, to attain the knowledge and skills needed in this competitive National economy. (20 U.S.C. 2301 (6) and (7))

The collection of this information is necessary to (1) make new awards with FY 2006/2007 funds and (2) manage and monitor future NHCTEP grantees. OVAE will be collecting performance data using form 524B.

- The Office of Vocational and Adult Education (OVAE) is requesting OMB clearance to collect information for the following Native Hawaiian Career and Technical Education Program (NHCTEP) documents and program requirements:
 - (a) Selection Criteria
 - (b) Budget instructions for NHCTEP (including budget form and budget narrative)
 - (c) Program Narrative

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.

This information collection is for a notice providing an application package for NHCTEP discretionary grants under the newly authorized Perkins IV. OVAE will conduct a new grant competition in August/September 2007 for the NHCTEP.

The data collected on the application form will be used in various ways leading to the award of a grant. Adequate information must be available to determine the eligibility of the applicant and to determine whether the project proposed can be funded under the provisions of the appropriate statutes or regulations. Also, field reviewers will use the information provided to rate the applications against published technical review criteria.

The NHCTP will expend FY 2006/2007 funds to award new grants. The data collected from the program requirements must relate to the goals and objectives that will be included in the approved project application. NHCTEP program staff will scrutinize grantees' budgets and reports to ensure that the grantees meet program objectives.

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.

NHCTEP applicants are encouraged to submit applications electronically, via Grants.gov. In past experience, we have found that approximately 50 percent of applicants provide information electronically.

- 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.**

There is no similar information available in other forms, or as the result of other information collections. This information collection does not duplicate any other information collection effort.

- 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.**

Respondents are not 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.**

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 Career and Technical Education programs.

- 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.**

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. Specifically address comments received on cost and hour burden.**

A 30-day *Federal Register* Notice will be published allowing for the public to comment on this collection.

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

No payments or gifts to respondents will be made.

- 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 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.

We estimate that the Department will receive approximately 10 new applications for award under the Native Hawaiian Career and Technical Education Program (NHCTEP). Additionally, it is estimated that the applicants will spend 120 hours developing their grant applications, and the total respondent burden will be 1200 hours. Based on the average preparation time of 120 hours per response, it is estimated that 100 hours would be used for review, research, gathering information, etc. The remaining 20 hours would be used for typing, copying, and submission.

<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>
2007-2008	10	Professional Clerical	100 20	1000 200
TOTAL	10		120	1200

- **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 to develop applications, in response to the notice inviting applications, is approximately \$27,400 based upon an average hourly rate of \$25.00 per professional and \$12.00 per clerical. Based on the average preparation time of 120 hours per response, it is estimated that 100 hours would be used for review, research, gathering information, etc. The remaining 20 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 \$33,388.00. This includes the salaries and expenses of program staff that manage the grants and other Department staff to support the grant competitions. The method used to estimate the cost is as follows:

Program Office Staff:		
1 GS-12 x 30 weeks	=	\$23,688.00
TOTAL	=	\$23,688.00
Other Department Staff	=	\$ 700.00
Outside Review Cost	=	\$ 9,000.00
TOTAL ESTIMATED FEDERAL COST	=	\$33,388.00

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

The burden hours have not previously been established for this program, as the grant award was made to only one grantee. Consequently, the entire 1,200 hours will be considered new burden and recorded as a program change on item 13(f) on the 83i.

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.

There are no plans to publish the results of this data collection.

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 19, "Certification for Paperwork Reduction Submissions," of OMB Form 83-I.

There are no exceptions to the referenced certification statement.