March 11, 2010

MEMORANDUM

TO: Bridget Dooling, OMB Desk Officer

FM: Edward Smith, Branch Chief, PAB/DATE/OVAE

SUBJECT: TERMS OF CLEARANCE Response

TERMS OF CLEARANCE: OMB approves this information collection subject to the following conditions:

Condition 1

Education will submit a change worksheet to OMB to share any screenshots for the web system that OVAE plans to launch soon. If any nonsubstantive changes are necessary with the move to a web collection, Education will submit those at the same time. If substantive changes are necessary, Education will submit a full revised ICR package under the PRA.

Response: This particular condition is unclear as to what OVAE was to be addressing four years ago and we have been unable to surface any documentation to support that anything was provided. Since the condition is from an earlier submission, we can only speculate as to what prompted the condition. In an attempt to address what might have been the impetus for this condition, I've looked at the Supporting Statement which cites:

3. <u>Use of improved information technology</u>.

The Department is encouraging eligible agencies to submit State plans electronically. Last year, all States submitted electronically their required State plan revisions; therefore, we anticipate that every eligible agency make an electronic submission of their new State plan.

If this is where the condition arose, we have, over the last 4 years, provided a Web submission site available for States to submit their Annual requirements to the Department. There has always been the ability to submit via US mail, e-mail, and 4 years ago we made available an internet submission site. The site is http://www.perkinsinfo.com/stateplans2010/.

We have provided 1 hour training session each year for States to submit their annual requirements via the Web site. The burden of submitting via the Web has been included in the overall calculations of burden since 2007, as were the US mail, and e-mail submissions. Therefore, there has been no change in the burden hours for this collection. I have added two screen shots of the Web submission site for your information.

Condition 2:

For joint plans (i.e., unified plans), respondents submit a related report to the Department of Labor under OMB number 1205-0407. For the next submission of this collection for OMB approval, Education will investigate whether it is possible to create a common form out of these two OMB numbers and combine the information collections. Education will report the results of its investigation to OMB concurrently with its submission of an ICR package for OMB review.

Response: While the opportunity to do a joint plan (unified plan) was available to States in years one and two -- no States took advantage of it. Therefore, the need for a combined information collection form is not necessary.

