

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 Carl D. Perkins Career and Technical Education Improvement Act of 2006 (Act) (PL 109-270) (20 U.S.C.2301, et seq.), was signed into law on August 12, 2006. Section 116 (a) – (g) of Perkins authorized the Native American Career and Technical Education Program.

The purpose of this new information collection package is to request approval to collect performance report data for the Native American Career and Technical Education Program (NACTEP). The NACTEP conducted a grant competition in the spring of 2007, and awarded 30 grantees for five year performance periods. OMB originally approved the NACTEP Information Collection (IC) package for three years. However, because the NACTEP grants will be required to submit semi-annual, annual performance reports, final performance reports, as well as evaluation reports and GPRA reports for an additional two to three years, the Office of Vocational and Adult Education (OVAE) is requesting a three year approval to do so.

The collection of this information is necessary to (1) determine whether or not the grantees are making substantial progress toward meeting their goals and objectives, (2) support continuation awards for years four and five of the grantees' performance periods, and (3) enter performance data in the Visual Performance Suite (VPS) data base.

- The Office of Vocational and Adult Education is requesting OMB clearance for the following Native American Career and Technical Education Program (NACTEP) reporting requirements. These reporting requirements are requested on the instrument via the form of a "Dear Colleague" letter which requests the additional program specific data be reported on the standard 524B form(s).
 - (a) Annual Performance/Statistical Reports
 - (b) Evaluation Reports
 - (c) 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.**

NACTEP program staff will review grantees' budgets, performance reports, evaluation reports, and GPRA reports to ensure that the grantees have met program goals and objectives. Based on the review of grantees' submissions, NACTEP program staff will determine whether or not grantees will be awarded continuation grants for subsequent project years four and five.

- 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.**

NACTEP applicants will submit annual performance reports and final performance reports, statistical reports, evaluation reports, and GPRA submissions using the ED 524B form via e-Reports/e-Grants system. One hundred percent of applicants will submit their annual performance reports to the Department, electronically.

- 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.

- 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 not small businesses.

- 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 key 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.**

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.**

Federal Register Notices were published, which allowed the public to comment on this collection package. A 60-day FRN published 3/16/2010 and a 30-day FRN published 5/20/2010.

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

The respondents will not receive a payment nor a 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.**

There are no pledges of confidentiality.

- 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 the Department will receive 30 submissions from currently funded NACTEP grantees. Additionally, it is estimated that the applicants will spend 120 hours developing their performance reports, GPRA reports, and evaluation reports.

Based on the average preparation time of 120 hours per response, it is estimated that 75 hours would be used for review, research, gathering information, etc. The remaining 45 would be used for typing, duplication, and electronic 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>
2009-2010	30	Professional Clerical TOTAL	25 (x 30 grantees) 15 (x 30 grantees) 40 (x 30 grantees)	= 750 = 450 = 1200
2010-2011	30	Professional Clerical TOTAL	25 (x 30 grantees) 15 (x 30 grantees) 40 (x 30 grantees)	= 750 = 450 = 1200
2011-2012	30	Professional Clerical TOTAL	25 (x 30 grantees) 15 (x 30 grantees) 40 (x 30 grantees)	= 750 = 450 = 1200
TOTAL	90		120	3600
ANNUAL AVERAGE	30		40	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 and submit semi-annual and annual performance reports, GPRA, and evaluation reports is approximately \$29,250 based upon an average hourly rate of \$30.00 per hour for professional work and \$15.00 per hour for clerical work. 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 needed for typing, formatting, copying, and submitting performance reports through the Department's e-Reports system.

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 \$30,769. 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-13 X 16 weeks = \$30,769

TOTAL = \$30,769

TOTAL ESTIMATED FEDERAL COST = \$30,769

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 data 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.

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.**

OVAE is 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