OFFICE OF VOCATIONAL AND ADULT EDUCATION
Promoting Rigorous Career and Technical Education Programs of Study
Through Statewide and Multi-State Articulation Agreements

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.**

Section 122(c)(1)9A) of the Carl D. Perkins Vocational and Technical Education Improvement Act of 2006 authorizes the Department to establish and carry out a program of national leadership activities to enhance the quality of career and technical education programs of study nationwide and requires that institutions receiving Perkins funding must incorporate at least one program of study. Under the authority of section 122 of the Act, the Secretary plans to support State and local efforts to enhance the quality and rigor of career and technical education programs of study by facilitating the formation of effective partnerships between secondary and postsecondary education, State workforce agencies, and employers to create statewide or multi-state articulation agreements.

Many State and local agencies have developed a variety of career and technical education programs of study to be offered as an option to students when planning for and completing future coursework, for career and technical content areas. These career and technical education programs of study are designed to outline rigorous academic and technical course standards that assist students to successfully transition from secondary to postsecondary education, and between postsecondary institutions. While the Department is generally aware of these efforts, there is little documentation of the level of rigor in technical courses or the effectiveness of the programs of study.

This discretionary grant competition is intended to enhance the quality and rigor of career and technical education programs of study by using the 10 components based on the Program of Study Design Framework. State and local implementation of the Framework will promote strong collaboration and ongoing communication between partners to identify Programs of Study that align with the demands of postsecondary education and the expectations of employers, allowing for “seamless” transitions from secondary to postsecondary education, and the ability of postsecondary students to transfer to other postsecondary institutions with out losing credit for courses already completed.

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.**

   Application information collected will be used by the Department to evaluate and score proposals as part of the selection process for awarding discretionary grants under this program. Selection will be made by the Assistant Secretary based on an independent review of a panel. The panel will review and rate each application independently, discuss each application, then revise ratings and associated comments based on their discussion.

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.**

   Applications for a discretionary grant under this competition may be submitted electronically or in paper format by mail or hand delivery. OVAE is requesting that respondents participate in the submission of applications via Grants.gov. Staff anticipates that approximately 70% of the applicants will submit applications electronically based on experience with previous discretionary grants and the continual rise in the percentage of entities that apply 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.**

   No information requested in the application package for a discretionary grant is superfluous to the competition. If any of the requested details in the application package are not provided to OVAE, the agency cannot properly evaluate proposals and a quality applicant cannot be selected.

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.**
   N/A

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 or 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.**

    Personally-identifiable information is 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.**

OVAE estimates that approximately 20 entities will submit applications for discretionary grants, and estimates the total burden to be 1660 hours as depicted below:

	Estimated Number of Burden Hours	Total Per Response	Total for Estimated 20 Responses
Professional Staff	1 Program Coordinator - 20 hours 1 Secondary State-level lead – 5 hours 1 Postsecondary State-level lead – 5 hours 9 Project Partners x 5 hours = 45 hours 1 Accountant/Budget Analyst- 8 hours	20 5 5 45 8	**400** **100** **100** **900** **160**
Total		**83**	**1660**

The estimated professional staff effort to develop an application is based on 1 project coordinator, 1 Secondary State-level lead, 1 Postsecondary State-level lead, 9 project partners (3 local coordinators, 3 secondary and 3 postsecondary leads), and 1 Accountant/Budget Analyst.

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 only 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

The estimated cost to respondents to complete and submit an application is approximately $2,490 based on an average hourly rate of $ 30.00.

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 are 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.

Program Office Staff			
3 GS-14 X 1 week	=	$1,600	(based on $48.00 per hour)
2 GS-7 X 1 week	=	$ 600	(based on $15.00 per hour)
Other Department Staff	=	$2,700	
Total Estimated Federal Cost	**=**	**$4,900**	

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 revision to an existing collection of data; all hours represent a reduction in the number of staff required and in the number of estimated expected application submissions. The purpose of this revision is to revise the existing Programs of Study collection under OMB Control Number 1830-0568. We have changed the requirements and corresponding selection criteria for the Rigorous Programs of Study program under section 114(c)(1) of the Carl D. Perkins Career and Technical Education Act of 2006. Grantees under this program are now required to:

1. Identify a State-developed or State-approved program of study that is built and sustained with all 10 key components in the "Program of Study Design Framework";

2. Implement the selected program of study in at least 3 local educational agencies (LEAs) within the State;

3. Conduct an annual evaluation of the project to assess the constancy of the implementation of the selected program of study in the participating LEAs and the effectiveness of each of the 10 Framework components, through use of a self-assessment instrument; and

4. Use a longitudinal data system that has the capacity to link and share data among systems housing different types of data, in order to collect valid and reliable data on the following required performance measures:

(a) Secondary school completion. The percentage of secondary students participating in the POS supported by the grant award who earn a high school diploma.

(b) Technical skills attainment. The percentage of secondary students participating in the POS supported by the grant award who attain technical skills.

(c) Earned postsecondary credit during high school. The percentage of secondary students participating in the POS supported by the grant award who earn postsecondary credit.

(d) Enrollment in postsecondary education. The percentage of secondary students participating in the POS supported by the grant award who enroll in postsecondary education by the fall following high school graduation.

(e) Enrollment in postsecondary education in a field or major related to the secondary POS. The percentage of secondary students participating in the POS supported by the grant award who enroll in a postsecondary education program in a field or major related to the participant's secondary POS.

(f) Need for developmental course work in postsecondary education. The percentage of secondary students participating in the POS supported by the grant award who enroll in one or more postsecondary education developmental courses.

(g) Postsecondary credential, certificate, or diploma attainment. The percentage of secondary students participating in the POS supported by the grant award who attain an industry-recognized credential, certificate, or associate's degree, within two years following enrollment in postsecondary education.

The performance measures listed above are a subset of the indicators of performance required under section 113(b) (State Performance Measures) and section 203(e) (Tech Prep Indicators of Performance and Accountability) of the Carl D. Perkins Career and Technical Education Act of 2006. Because States already collect data on these measures, there is no additional burden. Funded States will use their existing data systems to extract performance data on students enrolled in programs of study funded under this program. They will use the OMB-approved ED 524B Performance Report form to submit the required performance data and the annual evaluation of the implementation of the programs of study report to the Department.

Because of these changes, the burden has been reduced from 89 hours to 83 hours per respondent. Based on the number of respondents from the 2008 Rigorous Programs of Study competition (12), we have changed the number of anticipated respondents from 89 to 20, which is a reduction of 1900 burden hours, from 3560 to 1660.

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 to publish the collected data.

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 5CFR 1320.9.

B. <u>Collections of Information Employing Statistical Methods</u>:

Not applicable.