

## **SUPPORTING STATEMENT**

### **FOR PAPERWORK REDUCTION ACT SUBMISSION**

#### **Perkins Discretionary Grant Performance Report**

##### **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 regulation mandating or authorizing the collection of information.**

The purpose of this information collection package—the Perkins Discretionary Grant Performance Report—is to gather narrative, financial, and performance data on all discretionary programs administered by the Office of Vocational and Adult Education’s Division of Academic and Technical Education (OVAE-DATE), as required by the Education Department General Administrative Regulations (EDGAR 34 CFR 74.51, 74.52, 75.118, 75.253, 75.590, and 80.40). The Perkins Discretionary Grant Performance Report will be used by all OVAE-DATE discretionary grant recipients in lieu of the ED 524B Grant Performance Report and Instructions because the ED 524B is not compatible with OVAE-DATE’s new Perkins Information Management System.

The Perkins Discretionary Grant Performance Report will be a) submitted electronically via OVAE-DATE’s Perkins Web Portal; b) stored in OVAE-DATE’s Improving Program Performance Database; and c) accessed through OVAE-DATE’s Perkins Information Management System (PIMS). The Perkins Information Management System includes an administrative console that enables OVAE-DATE staff to -- a) query the system by grantee, by program, and by state; b) view narrative, financial, and performance data within and across programs; and c) create customized reports.

The Perkins Discretionary Grant Performance Report is a generic, single reporting instrument that combines all of the EDGAR performance and financial reporting requirements for discretionary grant recipients funded under the Carl D. Perkins Career and Technical Education Act of 2006 (P.L. 109-270). Recipients of multi-year discretionary grants must submit interim performance reports, usually annually, for each year funding has been approved in order to receive a continuation award. The annual performance report should demonstrate whether substantial progress has been made toward meeting the approved goals and objectives of the project. OVAE-DATE also requires recipients of “forward funded” grants that are awarded funds for their entire multi-year project up-front in a single grant award to submit an annual performance report.

The Perkins Discretionary Grant Performance Report will be used for interim and final performance reporting. In both the annual and final performance reports, grantees are required to provide data on established performance measures for the grant program (e.g., Government Performance and Results Act measures) and on project performance measures that were included in the grantee's approved grant application, in order to demonstrate project success, impact and outcomes. The Perkins Discretionary Grant Performance Report will also be used by grant recipients for other interim reporting such as quarterly or semi-annual performance and/or financial reporting.

**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 information gathered through this package will be used in a variety of ways. First, narrative and financial information will be reviewed by OVAE-DATE to determine each grant recipient's compliance with basic provisions of EDGAR 34 CFR Part 74.51 [Monitoring and reporting program performance] and 34 Part 74.52 [Financial reporting]), as well as EDGAR 34 CFR 75.118 [Requirements for a continuation award] and 34 CFR 75.253 [Continuation of a multi-year project after the first budget period].

Second, OVAE-DATE staff will review performance data to determine whether, and to what extent, each grant recipient has met its performance targets (as set forth in the recipient's approved grant application) for each Government Performance and Results Act (GPRA) performance measure established for the grant program, as well as any project-specific performance measures that were included in the approved grant application.

Third, OVAE-DATE staff will enter performance data on GPRA performance measures into the Department's Visual Performance Suite (VPS), a program and performance management database. DATE sets annual performance targets for each of the GPRA performance measures established for its discretionary grant programs to chart its own progress in helping discretionary grant recipients improve the educational and employment outcomes for students served by their programs. Targets and actual performance data are entered annually into the Department's VPS.

Finally, OVAE DATE staff will use narrative, financial, and performance information to identify grant recipients in need of targeted technical assistance, determine which grant recipients should be recommended for on-site monitoring visits in the coming year, and identify grants management and programmatic issues that should be the focus of coming program-specific discretionary grantee meetings.

**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.**

Each OVAE-DATE discretionary grant recipient will submit its report electronically via the Department's new Perkins Web Portal (Perkins.ed.gov). When finished in December 2012, this Web site will allow a discretionary grant recipient to complete reports using Web-based or Excel forms. There will be a number of pre-populated fields and drop-down menus on the electronic Perkins Discretionary Grant Performance Report form that eliminate data entry. Further, expandable fields will give grantees flexibility to provide the amount and level of detail needed to describe their progress on their program and project performance measures.

The discretionary grant recipient will certify the accuracy and completeness of the reports using electronic Personal Identification Numbers (PINs) supplied to the grant recipient by the Department. The grant recipient's Project Director must use one PIN to certify and sign the entire performance report submission. The authorized official responsible for certifying and signing budget expenditure reports must use another PIN. It is important to note that the use of the PINs to certify and sign the reports is the same as certifying the documents with a hand-written signature by the authorized official. Authorized officials are responsible for protecting the confidentiality of their PIN and for any use of their PIN by another individual. The new Perkins Web Portal is being designed to work hand-in-hand with the new Perkins Information Management System, to improve efficiency in program administration and oversight.

**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.**

Up to this point, OVAE-DATE's discretionary grant recipients have used the Department's ED 524B report form to submit performance reports via the Department's G5 System. However, the G5 System does not allow program offices to search through ED 524B reports to compile data submitted by different grant recipients across a given grant program, nor does it allow program offices to create custom reports from data submitted via the ED 524B.

The Perkins Discretionary Grant Performance Report does not require any information or data beyond what the Department currently requires its discretionary grant recipients to report in the ED 524B. It is a reformatted and restructured generic grant performance report designed to be compatible with OVAE-DATE's new Perkins Information Management System. It includes separate text boxes (narrative) and tables (data) to simplify data entry by grant recipients and to enable OVAE-DATE staff to query the system for specific information or data and to create customized reports. Also, budget and expenditure forms and instructions have been simplified to yield more useful information that will improve fiscal oversight of discretionary grant programs.

**5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.**

This collection does not impact small business.

**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.**

If the collection is not conducted via the Perkins Discretionary Grant Performance Report form, discretionary grant recipients would use the ED 524B report form to submit performance reports via the Department's G5 System. However, if OVAE-DATE discretionary grant recipients continue to use the ED 524B, their performance and financial data will not be stored in OVAE-DATE's new Improving Program Performance Database nor will it be accessed through the Perkins Information Management System. This will severely limit OVAE-DATE's ability to compile and analyze grant recipient performance data. The omission of discretionary grant narrative, performance, and financial data from the Perkins Information Management System will eliminate the system's usefulness regarding discretionary program administration and oversight, reduce the Department's return on investment in the new website, database and information management system it has purchased, and hobble OVAE-DATE in its efforts to be more efficient and cost effective in carrying out its many program administration functions.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

The information will not be collected in a manner inconsistent with the guidelines in 5 CFR 1320.5.

- **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 than 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 for 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.**

**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.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

Both a 60- and 30-day Federal Register Notice was published, with no public comments received during the 60-day FRN.

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

The respondents will not receive any payment or gift for completing the information collection.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

There are no assurances 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. The 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.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 16 of IC Data Part 1.**
- **Provide estimates of annualized cost to respondents of 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 not be included in Item 14.**

Over the next three years approximately 88 respondents each year will use the Perkins Discretionary Grant Performance Report form as either an interim or final performance report (estimate based on actual number of OVAE-DATE discretionary grant recipients in FY 2012/2013). Approximately 50 discretionary grantees will use the form each year either as an annual or final performance report. The annual burden hours per response is estimated to average 22 hours for either the annual or final performance report and reflects the estimated time grantees spend reporting on project progress and performance and addressing administrative requirements. While the form requires final performance report respondents to provide summary information for the entire project period, much of that information could be synthesized from previously submitted interim performance reports. The burden hour average for annual and final performance report respondents listed above is based on the estimated range of 19 to 25 hours to complete the Perkins Discretionary Grant Performance Report form.

Approximately 38 discretionary grantees will use the form each year for other interim reporting, such as quarterly or semi-annual performance reporting. The annual burden hours per response is estimated to average 12 hours for either the quarterly or semi-annual performance report and reflects the fact that respondents are not required to complete several sections of the form for quarterly or semi-annual reporting. The burden hour average for quarterly and semi-annual performance report respondents listed above is based on an estimated range of 10 to 14 hours to complete only those sections of the Perkins Discretionary Grant Performance Report form that are required for quarterly or semi-annual reporting.

**Annual Burden Hour Calculations for the Perkins Discretionary Grant Performance Report Form:**

Burden Hours for Perkins Discretionary Grant Performance Report form when used as an Annual or Final Performance Report: 22 hours/response X 50 responses/year = 1,100 total annual burden hours.

Burden Hours for Perkins Discretionary Grant Performance Report form when used as a Quarterly or Semi-Annual Performance Report: 12 hours/response X 38 responses/year = 456 total annual burden hours.

Total Annual Burden Hours for Perkins Discretionary Grant Performance Report form: 1,100 burden hours (annual/final performance report) + 456 burden hours (quarterly and semi-annual performance report) = 1,556 total annual burden hours.

Program Year	Report Type	Estimated Number of Responses	Estimated Number of Burden Hours	Total Estimated Number of
--------------	-------------	-------------------------------	----------------------------------	---------------------------

			Per Response	Burden Hours
2013/20 14	Annual/Final	50	22	1100
	Quarterly/Semi-Annual	38	12	456
ANNUAL AVERAGE		88	34	1,556

See the IC Burden Analysis Table for more detailed information.

**Total Annual Cost Burden to Respondents for the Perkins Discretionary Grant Performance Report Form:**

1,556 total annual burden hours x 25/hour = \$38,900

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

There are no costs to respondents for the capital and start-up cost components for this information collection. 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 are not included in this estimate.

There are also no costs to respondents for the total operation and maintenance and purchase of service components for this information.

The information collection will create minimum cost to the grant recipients to generate, compile, maintain, and disclose the information.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The annual cost to the Federal government to implement this information collection is estimated at \$20,009. This includes the salaries and expenses of OVAE-DATE program staff that review the narrative, fiscal and performance data and a small portion of contractor costs for web site/system maintenance. The method used to estimate the annual cost is as follows:



**Total Annual Cost to the Federal Government for Perkins Discretionary Grant Performance Report Form: \$20,009**

OVAE-DATE Staff: \$10,009

Perkins Discretionary Grant Performance Report form as Annual or Final Performance Report:  
3 hours per response x 50 responses x \$48.35/hour (GS 13 hourly rate) = \$7,253.

Perkins Discretionary Grant Performance Report form as Quarterly or Semi-Annual Performance Report:

1.5 hours per response x 38 responses x \$48.35/hour (GS 13 hourly rate) = \$2,756.

Contractor Costs: \$10,000

**15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.**

This is a new collection. There are no adjustments.

**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 dates, and other actions.**

The results of the collection will not be published.

**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 the Certification of Paperwork Reduction Act.**

This request is in compliance with 5 CFR 1320.9.