

[ICR No. 1219.24] 1830-0027 - Measures and Methods for the National Reporting System for Adult Education

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

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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 hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section. Please limit pasted text to no longer than 3 pages. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

Title II of the Workforce Investment Act (WIA -- P.L. 105-220), entitled the *Adult Education and Family Literacy Act* (AEFLA), creates a partnership among the Federal government, States, and localities to provide, on a voluntary basis, adult education and literacy services.¹ Section 212 of Title II requires that a comprehensive performance accountability system be established to assess the effectiveness of eligible agencies in achieving continuous improvement of adult education and literacy activities in order to optimize the return on the Federal investment.

The accountability system must include the following measures of performance. These measures are referred to in AEFLA as “core indicators”:

1. demonstrated improvements in adult learners’ literacy skill levels;
2. placement in, retention in, or completion of postsecondary education, training, unsubsidized employment or career advancement; and
3. receipt of a secondary school diploma or its recognized equivalent.

States submit 10 required tables, 6 optional tables, 4 financial reports, 1 narrative report, and 1 data quality checklist. These table and report forms are included in the document named “Instrument.” States include in the tables all participants in programs:

1. that meet the purposes of AEFLA, and
2. for which expenditures are reported on the Federal Financial Report.

Under AEFLA, States must consider the performance of a subrecipient on the measures as one factor in determining the subrecipient’s eligibility for funding (Section 224 (b)(3)).

¹ AEFLA can be found at the following link:
<http://www.gpo.gov/fdsys/pkg/PLAW-105publ220/html/PLAW-105publ220.htm>

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Section 212 (c) requires each eligible agency to report annually to the Secretary on its progress in achieving its targets, including information on the levels of performance achieved with respect to the core indicators of performance. The Secretary (Section 212 (c)(2)) is required to make the information contained in the State reports available to the public, disseminate State-by-State comparisons of the information, and provide the appropriate committees of Congress with such reports. In addition, the Secretary is to consider eligible agency performance on the core indicators of performance in awarding performance incentive grants to States (Section 503).

Two other legislative and regulatory statutes require the collection of this information : The Government Performance and Results Act (GPRA) of 1993 and the Education Department General Administrative Regulations (EDGAR).

The Government Performance and Results Act (GPRA) of 1993. The Government Performance and Results Act (GPRA) of 1993 requires each Federal agency to develop a strategic plan to ensure that its services are delivered efficiently and in a manner that best suits client needs and to develop indicators of performance to demonstrate the agency's impact. The GPRA indicators for the Division of Adult Education and Literacy within the Office of Career, Technical, and Adult Education (OCTAE) are improvements in student literacy levels(referred to as "educational gain") and other "follow-up" outcome measures. OCTAE plans to obtain this information from this data collection extension package.

The Education Department General Administrative Regulations (EDGAR). In addition to the accountability requirements contained in AEFLA, EDGAR requires grantees to submit performance reports not more frequently than quarterly or less frequently than annually (34 CFR 80.40). Those regulations also require grantees to submit financial status reports not more frequently than quarterly or less frequently than annually (34 CFR 80.41).

In 2011, OMB most recently approved the data collection required by AEFLA (OMB 1830-0027). OCTAE is requesting an extension of this approval. As proposed here, this collection will contains minor changes from the collection approved in 2011. These changes are described below:

In 2011, OMB approved changes in the way cohorts are defined for purposes of this data collection. Prior to these 2011 changes, states only collected data on a specific outcome measure for adult education participants who set the goal to achieve that outcome. As a result of the changes approved in 2011, states must report outcome data on all participants who meet the criteria for a specific follow-up measure. The new cohort definitions enlarged the size of the cohorts for reporting purposes. The data collection extension presented here allows states the option of using a representative group of cohort members to determine whether they have met the outcome measure. This option reduces the data collection burden for those states that elect to use it.

In recent months OCTAE released several new automatic validation functions in its web-based reporting system used for this data collection. These new automatic validation functions give states immediate notice of any discrepancy in the data they enter, allowing a

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state to correct the discrepancy before submitting its data to OCTAE. These database enhancements increase the efficiency of the data collection process, reduce burden, and ensure the quality of the data that states report.

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.

OCTAE uses the information received from the current collection to fulfill three WIA requirements outlined in Sections 503, 243, 212, and, to ensure our compliance with the Government Performance and Results Act of 1993.

Section 503

WIA authorizes Section 503 incentive awards for States that exceed their performance levels established in their State plans. The Department of Education (ED) will use the information reported to determine whether performance levels have been exceeded and determine each State's eligibility for these awards.

Section 243

WIA Section 243 requires ED to provide technical assistance to states and evaluate the effectiveness of local programs. ED will use the information reported to identify which states have not reached acceptable levels of performance and may need technical assistance from ED to improve their service delivery system. The information will also be used to identify high performing States that can show the performance levels that are possible and how to achieve them.

Section 212

The Department will use the information received from the current collection to fulfill the reporting requirements in Section 212(c)(2) of WIA and OCTAE's reporting requirements under GPRA. AEFLA sets reporting requirements for Title II that state that the Secretary of ED shall:

1. publish data on each State's performance indicators,
2. disseminate State-by-State comparisons of performance, and
3. report to the appropriate committees of the U.S. Congress on State performance.

In addition to the purposes above, OCTAE has used the information from this data collection extension proposal for its monitoring efforts and for budget justification.

GPRA

GPRA requires all Federal agencies to develop strategic plans to ensure that their services are delivered efficiently and in a manner that best suits client needs and to develop indicators of performance to demonstrate their agency's impact. OCTAE's approved GPRA indicators for the Division of Adult Education and Literacy are improvements in student literacy levels (referred to as "educational gain") and other follow-up outcome

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measures. OCTAE plans to obtain this information on student outcomes from the accountability system that is the subject of this OMB data collection extension proposal.

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 given to using technology to reduce burden.

Over the past several years, States have developed individual student record systems using relational databases to track students and to meet reporting requirements within the States. Technology continues to play a significant role in the collection of data from the States, significantly reducing the burden of data collection and analysis.

States will prepare the statistical reporting information required by this data collection extension proposal through their individual student record systems and submit this information to OCTAE electronically. To assist States in electronic reporting, in 2004, OCTAE created a web-based database system known as the National Reporting System for adult education (NRS). The NRS facilitates the reporting of statistical and financial data that is required for national program comparability and to ensure overall program accountability. This system automates the process by which States collect, compile, and report the data and results in a paperless annual reporting system.

The electronic compilation and annual submission of these data makes the collection more efficient and accurate. Rather than compiling individual paper reports from each local program into one State report, the web-based submission automatically compiles the data and eliminates any manual calculations at the State or Federal level. Validation functions, alerting state officials to data discrepancies, ensure that the data are of high quality. Lastly, the web-based reporting system allows States to submit statistical, financial and narrative reports electronically, in an integrated, seamless fashion.

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 to be collected in the annual reports is not available from any other source and the collection of the information will not duplicate any existing data collection efforts.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

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No small organizations or small businesses are affected by this data collection.

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.

There would be several important consequences of not collecting this information or collecting it less frequently. If the collection did not occur, ED would be unable to comply with several statutory mandates, including the requirement in Section 212(c)(2) that OCTAE submit an annual report to Congress on the extent to which States have met their agreed-upon performance levels,. The Department would also be in noncompliance with GPRRA reporting requirements, if this information could not be collected to develop performance reports. In addition, the annual incentive awards described in Section 503 are based on these data. Less frequent collections will either make it necessary to grant these awards based on outdated data or will make it impossible to grant the incentive awards on an annual basis, as required by law.

7. Explain any special circumstances 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 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 that 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.**

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No special circumstances apply to this effort.

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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.

A 60 and 30-day Federal Register Notice was published, the Department did not receive any public comments.

OCTAE annually convenes a technical work group (TWG) comprised of state representatives and representatives from adult literacy organizations. We obtain their TWG members views on accountability policy issues and logistical aspects of the NRS data collection process, including the design and implementation of the collection itself. The technical work group also informs the development of the regional NRS training offered annually to states. Additionally, OCTAE provides NRS information sessions at the annual meeting for adult education state directors and conducts webinars throughout the year related to the NRS implementation issues and data use.

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

The respondents will not receive any payments or gifts for completing the information collection.

- **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the ICRAS' Part 2 IC form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided. Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities,**

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OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information). If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

As proposed in this data collection extension, the data collected by states and submitted to the U.S. Department of Education will be aggregated data. It will not include any personally identifiable information. Assurances of confidentiality to adult education participants are, therefore, not applicable to this collection.

- **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.**

None of the data collected in the National Reporting System is sensitive in nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in Question 12. 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.**

WIA and EDGAR require eligible agencies to submit Annual Performance Reports to demonstrate continuous improvement in the delivery of their approved State Plan. Because there are no major changes associated with this data collection extension proposal, OCTAE assumes that the burden hours in each of the next three years will be the same as the estimates used previously – i.e., 100 hours per response. Although OCTAE has proposed a few minor changes in this data collection extension proposal, these changes are not likely to add burden. For example, the change allowing states to

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report on a representative group when reporting on the follow-up measures is likely to reduce burden. Additionally, the new table in the Federal Financial Report is not likely to add a new burden because states already collect this financial information. .

The estimated average burden hours are 100 hours per response in each of the three years (2014-2017) for a total estimate of 5700 burden hours each year and a total estimate of 17,100 over the entire three years.

Program Year	Number of Responses	Type of Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2014-15	57	Professional Data Entry	80 20 = 100 hours	4560 1140 =5700 hours
2015-16	57	Professional Data Entry	80 20 =100 hours	4560 1140 =5700 hours
2016-17	57	Professional Data Entry	80 20 =100 hours	4560 1140 =5700 hours

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form. (The table should at minimum include Respondent types, Number of Respondents and Responses, Hours/Response, and Total Hours)**

This data collection extension involves only one form.

- **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 be included in Question 14.**

After slightly increasing the hourly rate of both labor categories from the rates used for this estimate in 2011, the cost per response for the professional labor is \$2,080 (80 hours times an hourly rate of \$26/hr) and the cost per response for the data entry is \$300 (20 hours times an hourly rate of \$15/hr).

Program Year	Type of Staff	Average Burden Hours per Response	Hourly Rate	Average Total Cost Per Response
2014-15	Professional Data Entry	80 <u>+ 20</u>	\$26 \$15	\$2,080 <u>\$300</u>

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		100 hours		\$2,380
2015-16	Professional	80	\$26	\$2,080
	Data Entry	+ 20	\$15	<u>\$300</u>
		100 hours		\$2,380
2016-17	Professional	80	\$26	\$2,080
	Data Entry	+ 20	\$15	<u>\$300</u>
		100 hours		\$2,380

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 Questions 12 and 14.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Question 12.**

Total Annualized Capital/Startup Cost: \$0
Total Annual Costs (O&M): \$0
Total Annualized Costs Requested: \$0

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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 their costs are 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. 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.

Federal Software Modifications

There are costs to updating and maintaining the Federal data system through which states report the data. The total cost is estimated at \$120,000 for software revisions and testing.

Program Office Staff

The total estimated Federal cost for program office staff is \$136,786.40 over three years and is calculated as follows:

Program Office Staff	Estimated Number of Hours Per Year	FY 2014 Hourly Rate	Estimated Cost Per Year	Total Cost for Three Years
GS-13	440	\$43.09	\$18,959.60	\$56,878.80
GS-13	240	\$43.09	+\$10,341.60	+\$31,024.80
GS-14	320	\$50.92	+\$16,294.40	+\$48,883.20
			<u>\$45,595.60</u>	<u>\$136,786.80</u>

The total Federal costs are estimated to be \$256,786.80 over three years, with an average annual cost of \$85,595.60. This includes contractor beta testing and web site maintenance, and the salaries and expenses of program staff who manage the process. The average annual Federal cost is calculated as follows:

\$120,000.00 Software Modification Costs

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+	<u>\$136,786.80</u>	Federal Program Office Staff Costs
	<u>\$256,786.80</u>	Total Federal Costs for Three Years
÷	3	Divided by 3 Years
=	<u>\$85,595.60</u>	Average Annual Federal Costs

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

There is a program change decrease of -12,350 burden hours associated with this data collection extension proposal; the one-time implementation of changes to the follow-up measures in 2011 has been completed. This extension incorporates no significant changes to the existing collection during the extension period.

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 data collection are published in OCTAE's annual report to Congress. There are no complex analytical techniques used for the publication of these statistical tables. The state-level data are aggregated and presented for the entire country by performance measure.

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.

OCTAE is not seeking exemption from displaying the expiration date.

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.