

[ICR No. 1240.08] 1830-0569 - Consolidated Annual Report (CAR) for the Carl D. Perkins Career and Technical Education Act of 2006

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.

The U. S. Department of Education (Department) is requesting a revision to the Perkins Consolidated Annual Report (CAR), Information Collection (IC) Number 1830-0569. This information collection gathers narrative, financial, and performance data pursuant to the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV). See document *Perkins Web Portal: Guide for Submitting the Consolidated Annual Report (CAR)*.

Section 113(c) of Perkins IV requires each eligible agency that receives an allotment under section 111 of Title I of the Act (State basic grant) to annually prepare and submit, to the Secretary, a report regarding the progress of the State in achieving the State adjusted levels of performance on the core indicators of performance and additional indicators of performance. This includes the levels of performance for special population categories described in section 3(29) of Perkins IV and other student categories described in section 1111(h)(1)C(i) of the Elementary and Secondary Education Act of 1965, as amended by Every Student Succeeds Act of 2015 (ESSA). The CAR is a single on-line reporting instrument that combines the requirements referenced above with the required annual interim and final financial status reports pursuant to the Education Department General Education Regulations (EDGAR) in 34 CFR §80.41. The current CAR expires in August 2017 and Congress has not taken action to reauthorize the legislation.

This CAR revision request eliminates three narrative items in order to reduce respondent burden. These narrative items required the State to report on: (1) the areas for which States have technical skill assessments; (2) the implementation of their local program improvement plans; and (3) the uses of funds for State institutions. None of these items are legislatively required and, therefore, can be removed from the CAR without compromising the Department's fiduciary responsibility for the administering and implementing the Perkins Act.

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.

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The information gathered through this package will be used in a variety of ways. First, narrative and financial information are reviewed by the Office of Career and Technical Adult Education (OCTAE), Division of Academic and Technical Education (DATE), to determine each State's compliance with provisions of Perkins IV and the Education Department General Administrative Regulations (34 CFR Part 80.40 [Annual Performance Report] and Part 80.41 [Financial Status Report]). For example, States are required to implement specific leadership activities in their State, as well as to spend certain percentages of their funding to meet the academic and technical skill needs of various student populations (i.e. individuals preparing for nontraditional careers and individuals in State institutions).

Second, DATE staff review performance data to determine whether, and to what extent, each State has met its State adjusted levels of performance for the core indicators described in section 113(b)(4) of Perkins IV. A State that did not meet at least 90 percent of the adjusted levels of performance for any of the core indicators described in section 113(b)(4) of Perkins IV is required to develop and submit, as part of its CAR report, a program improvement plan with special consideration to the performance gaps identified under section 113(c)(2) of Perkins IV. The improvement plan must address each core indicator(s) that a State failed to meet; disaggregated categories of students for which there were quantifiable disparities or gaps in performance compared to all students or any other category of students; steps that will be implemented, beginning in the current program year; staff members in the State who are responsible for each action step; and the timeline for completing each action step. DATE staff will review these plans in order to determine whether they are thorough and appropriate in addressing the indicator(s) that were not met at the 90 percent level. DATE staff will review ESEA 1S1 and 1S2 waivers and supporting documents of applicable States.

Third, Perkins IV section 113(c)(3)(C) requires the Secretary to provide the appropriate committees of Congress copies of annual reports received by the department from each eligible agency that receives funds under the Act. Section 113(c)(3)(A) further requires the Secretary to make the information contained in such reports available to the general public. To meet this obligation, DATE compiles the CAR data into an annual report to Congress and makes the data available to the public online through the Peer Collaborative Resource Network (PCRN) at <http://cte.ed.gov>.

Fourth, DATE charts its own progress in helping States to improve the educational and employment outcomes for students who pursue career and technical education by setting annual performance targets for each of the core indicators of performance in section 113(b). Targets and performance data are entered annually into the Department's Program and Performance Management Database (PPMD)

Finally, DATE staff uses annual CAR information to determine which States will be monitored for an upcoming year or which States could benefit from technical assistance in particular areas. Annual CAR reviews results help in the identification of topics for annual Data Quality Institutes (DQIs), as well as the decision to offer customized technical assistance to States on accountability issues. This strategy has been well-received by the States and is deemed by OCTAE, effective in improving the reliability and validity of the Perkins data.

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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.

Each State submits its report electronically via the Department's Program Information Management System Web site at <https://perkins.ed.gov/Account/LogOn?ReturnUrl=%2f>. This Web site allows a State to complete its CAR report using Web-based forms and to certify to the accuracy and completeness of its submission using electronic Personal Identification Numbers (PINs). The State CTE director must then use one PIN to certify and sign the entire CAR submission. The authorized State official responsible to certify and sign Financial Status Reports (FSR) must use another PIN. It is important to note that the use of the PINs to certify and sign the CAR and FSRs is the same as certifying the documents with a hand-written signature by the State official. State officials are responsible for protecting the confidentiality of their PIN and for any use of their PIN by another individual.

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 Question 2 above.

This information gathered as part of this collection is not required to be submitted to any other office within the Department of Education.

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.

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.

Without the information gathered through the CAR, the Department would be unable to determine whether, and to what extent, States were complying with the Perkins IV legislation or other applicable Federal regulations. Moreover, the Department would be unable to sufficiently review each State's progress in meeting its adjusted levels of performance, much less determine its own effectiveness in helping States to achieve the purposes of the Act. The statute dictates the frequency of collection and the types of information that must be collected.

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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.

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

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 day notice was published in the Federal Register on June 18, 2017 (82 FR 22816). A 30 day notice will be published.

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

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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. 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, 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.

No personally identifiable information is collected in the CAR, therefore, no assurances of confidentiality are required.

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 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**

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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. (The table should at minimum include Respondent types, Number of Respondents and Responses, Hours/Response, and Total Hours)**
- **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.**

With both Professional and Clerical staff completing the CAR, total annual burden hours for this revision are 9,020 hours.

Program Year	Estimated Number of Responses	Type of Staff	Estimated Number of Burden Hours Per Response	Total Estimated Number of Burden Hours
2016-2017	55	Professional	92	5,060
		Clerical	72	3,960
2017-2018	55	Professional	92	5,060
		Clerical	72	3,960
2018-2019	55	Professional	92	5,060
		Clerical	72	3,960
ANNUAL AVERAGE	55		164	9,020

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.**

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- 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.

There are no such costs to respondents.

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 Questions 12, 13, and 14 in a single table.

The annual cost to the Federal government to implement this information collection is estimated at \$45,221. This includes contractor beta testing and web site maintenance, and the salaries and expenses of DATE program staff who manage the process and review the CAR data. The method used to estimate the annual cost is as follows:

Program Office Staff:

1 GS-13	X	210 hours	= \$ 9,538
1 GS-15	X	90 hours	= \$ 5,683
Total Program Office Staff:			<u>= \$ 15,221</u>
Contractor Staff:			= \$ 30,000
ESTIMATED FEDERAL COST			= \$ 45,221

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with

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change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

There is a program change decrease of 550 annual burden hours. This CAR revision request eliminates three narrative items in order to reduce respondent burden. These narrative items required the State to report on: (1) the areas for which the State has technical skill assessments; (2) the implementation of its local program improvement plans; and (3) the uses of funds for State institutions. None of these items are legislatively required and, therefore, can be removed from the CAR without compromising the Department’s fiduciary responsibility for administering and implementing the Perkins Act. The total burden and responses for this request are 9,020 hours and 55 responses.

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.

An annual report to Congress is prepared and published using the information collected in the CAR instrument. Enrollment and accountability data are also made available on the Department’s Perkins Collaborative Resource Network (PCRN) at cte.ed.gov. On the PCRN, interested parties can view data for individual States, as well as run customized reports with aggregated and disaggregated data on the students who participate and concentrate in CTE programs across the nation.

17. 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.

Below is the general schedule for production:

Task	Timeline
States submit CAR data	December 31 (deadline for reporting each year)
DATE staff review State’s CAR submissions	January 1 – March 15
States receive notification on the approval of their CAR submissions	March 15
DATE staff, in collaboration with contractors, tabulate data and prepare individual State profiles	March 15 – April 15
DATE staff develops draft report	May 15
DATE staff submits final draft report for Department clearance	June 1
DATE staff submits final report for Office of Communications and Outreach for final editing and printing	June 30
DATE staff submits final report to Congress	July 15

18. 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.

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**19. 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.