SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

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[1]. 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 purpose of this new collection is to obtain information about innovative practices in adult education and literacy that are associated with positive outcomes for adult learners.

   The Adult Education and Family Literacy Act (AEFLA) program, authorized by Title II of the Workforce Innovation and Opportunity Act (WIOA; P. L. 113-128) awards formula grants to states to support educational programs and services for adults who lack a high school credential or proficiency in English. Section 242 of WIOA authorizes the U.S. Department of Education (ED) to carry out national leadership activities to enhance the quality and outcomes of adult education and literacy activities and programs nationwide, including by providing technical assistance to states and AEFLA subrecipients and by developing, improving, and identifying successful methods and techniques for addressing the education needs of adults. While states are making great strides toward implementing their approved WIOA Title II plans, they continue to seek examples of practices for the delivery of services that will result in improved learning gains, postsecondary attainment, and employment outcomes for adult learners.

   Funded by appropriations for section 242 of WIOA, the Supporting Excellence in Adult Education project seeks to identify, document, and disseminate some of the innovative practices that local adult education programs are carrying out. The information from this project will greatly assist AEFLA providers in becoming more knowledgeable about innovations and in improving the quality of their services. The adult education field, including state adult education agencies and local AEFLA programs, will be encouraged to identify and, through a voluntary application process, share information about innovative practices that result in meaningful outcomes for participants.

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.**

   This application will be made available online to state adult education agencies and adult education programs by OCTAE to encourage them to share innovative approaches that have resulted in meaningful outcomes for their program participants. ED staff in the Office of Career and Technical Education (OCTAE) will review the information provided in each application and the associated learner outcome data to determine whether an innovation merits dissemination.

[1] Please limit pasted text to no longer than 3 paragraphs.

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.**

   The application form will be available online, and project staff will be available by telephone and email to assist prospective respondents in completing the application. The application is a downloadable Word document, which allows users to save their work and return to complete the application at a later time. Applicants will be asked to email the final document to the project's email address.

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 focuses on the innovative practices and outcomes from these practices that are used in local adult education programs. The descriptive information about individual innovative practices that is requested in the application is not collected by any other ED or OCTAE initiatives. The adult learner outcome data requested by the application is collected under OMB Control Number 1830-0027 (Measures and Methods for the National Reporting System for Adult Education) and reported to State agencies that administer AEFLA,[2] enabling respondents to provide the data from readily available records.

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.**

   The respondents are administrators of adult education programs funded by AEFLA. Adult education programs are diverse and may include organizations such as local educational agencies, community- and faith-based organizations, volunteer literacy organizations, institutions of higher education, public or private non-profit agencies, libraries, and public housing authorities. Some of these entities may be small organizations. The collection minimizes burden on small entities by soliciting the information through electronic means and by providing technical assistance by telephone

[2] States, however, report only aggregate state data on learner outcomes to OCTAE. The program-level learner outcome data sought by this collection are not currently collected by, or available to, OCTAE staff.

or email to prospective respondents. Additionally, the application process is voluntary for all entities.

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.

The call for applications will be administered once annually, giving AEFLA programs multiple opportunities to submit their innovative practices for review. Section 242 of WIOA authorizes the ED to establish and carry out a program of national leadership activities to enhance the quality and outcomes of adult education and literacy programs nationwide. If this project is not implemented, the Department's ability to fulfill the mandates of section 242 will be diminished.

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.

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.

    The 60-day notice to solicit public comments was published on March 12, 2019 (84 FR 8849). One commenter responded. Responses to the comments from this commenter are addressed in a separate document. The ICR was not changed in response to these comments.

    The 30-day notice to solicit public comments was published on May 17, 2019 (84 FR 22480). Two commenters responded. Responses to these comments are addressed in a separate document. The ICR was not changed in response to these comments.

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

    Respondents will not receive any payments, awards or gifts.

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 IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.[3] If the collection is subject to the Privacy Act,**

[3] 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 –

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.

The collection does not solicit personally identifiable information; only aggregate program-level learner outcome data are requested.

The applications will be hosted on the contractor's secure website. The contractor, Manhattan Strategy Group (MSG) has instituted a data security process for the collection, storage and processing of sensitive or personally identifiable data that is fully aligned with those of the National Institute of Standards and Technology and compatible with the full Security Authorization and Accreditation process. Its cloud-based servers meet the following security standards: SOC 1/SSAE 16/ISAE 3402 (formerly SAS 70), SOC 2 and 3, FISMA, DIACAP, FedRAMP, DOD CSM Levels 1–5, PCI DSS Level 1, ISO 9001/ISO 27001, ITAR, FIPS 140-2, and MTCS Level 3. AWS also meets industry-specific standards, including those of the Criminal Justice Information Services (CJIS), Cloud Security Alliance (CSA), Family Educational Rights and Privacy Act (FERPA), and Health Insurance Portability and Accountability Act (HIPAA).

MSG servers are compartmentalized, and access to certain folders is restricted to senior management and the staff assigned to each project. Permission is further restricted within the project team, ensuring that only those staff OCAE and project director deem appropriate may access sensitive information.

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 item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates.**

Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

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 the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent 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 Item 14.**

Upon approval of the information collection, we will begin the application process and accept applications annually over three years. We expect approximately 15 applications in the first year and 20 applications each year thereafter, or a total of 55 applications from local AEFLA providers over the next three years.

Our estimates for the completion of the application are based on similar application forms that the project staff developed for adult education local providers and state staff in previous ED/OCTAE projects (i.e., MSG and Abt Associates, Moving Pathways Forward: Supporting Career Pathways Integration,2016; Kratos and Abt Associates, Policy to Performance, 2012; and Abt Associates, ABE State Delivery System Strategic Planning and Service Provision Demonstration Program, 2009). We estimate that it will take a local adult education program staff member 4 hours to complete the application, which involves: (1) organizing information about an innovative practice; (2) preparing a one-page description about the operation of the practice; (3) providing contact information about the program; and (4) corresponding with the state adult education staff to obtain support for the application. Because the information collection request also asks that the state adult education director review and approve the application, the burden estimate includes the time associated with this activity. We estimate that a state adult education staff member will spend up to 2 hours reviewing the description of the innovative practice and preparing a letter of support for the practice to be considered for the project. The total number of burden hours is estimated to be 90 hours in the first year and 120 hours in each of the succeeding two years.

Exhibit 1. Estimated burden hours

Program Year	Number of Responses	Type of Staff	Average Burden Hours per Response	Total Burden Hours
2019	15	Local Program Administrator State Program Administrator TOTAL	4 2	60 30 =90 Hours
2020	20	Local Program Administrator State Program Administrator TOTAL	4 2	80 40 =120 hours
2021	20	Local Program Administrator State Program Administrator TOTAL	4 2	80 40 =120 hours
Average	18		6	110 hours

Assuming an hourly rate of $42.42[4], the estimated cost per response is $254.52. The average annualized cost burden is $4,666.20.

Exhibit 2. Estimated costs

Year	Respondent	Average Burden Hours per Response	Hourly Rate	Average Total Cost Per Response	# of Responses	Total Annual Costs
2019	Local Program Administrator State Program Administrator	4 2	$42.42 $42.42	$169.68 $84.84 $254.52	15	$3,817.80
2020	Local Program Administrator State Program Administrator	4 1	$42.42 $42.42	$169.68 $84.84 $254.52	20	$5,090.40
2021	Local Program Administrator State Program Administrator	4 1	$42.42 $42.42	$169.68 $84.84 $254.52	20	$5,090.40
	Average	5	$42.42	$254.52	18	$4,666.20

4 The mean hourly wage for Education Administrators, All Others was $42.42 as reported in May 2017 by the U.S. Department of Labor, Bureau of Labor and Statistics: https://www.bls.gov/oes/current/oes119039.htm. This is the most appropriate labor category for both program directors and state staff.

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.)

- **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 Item 12**

Total Annualized Capital/Startup Cost :
Total Annual Costs (O&M) :____________________
Total Annualized Costs Requested :

There are no direct costs to respondents beyond their time to complete the application as documented in question 12 above.

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.

This information collection is supported by a contract, the annualized cost of which is $742,594. This includes the estimated cost of coordination with the U.S. Department of Education staff; planning and scheduling development; development, production and dissemination of materials promoting the opportunity; overseeing application collection; application review and reporting; and progress reporting.

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

This is a new 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 of information, completion of report, publication dates, and other actions.

Applications will be collected for the purpose of identifying noteworthy projects. U.S. Department of Education staff will review the information provided in each application and the associated learner outcome data to determine whether an innovation merits dissemination. The information contained in applications will not be tabulated or publicly disseminated. Information products and resources describing the innovative practices implemented by these noteworthy projects will be developed for adult education practitioners and administrators and distributed on OCTAE's professional development website (www.lincs.ed.gov) and at applicable national conferences.

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.

The OMB expiration date will be displayed on all data collection instruments.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

There are no exceptions.