

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

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.**

This is a request to extend approval of the information collection which solicits applications for the Native American Career and Technical Education Program (NACTEP). The collection request includes a notice inviting applications and an accompanying application package that were published on February 5, 2018. These documents set out the selection criteria used to assess the quality of applications, establish the Government Performance and Results Act (GPRA) indicators on which grantees must report, and require grantees to support an independent evaluation of their project.

NACTEP, authorized by section 116 of the Carl D. Perkins Career and Technical Education Act of 2006 (PL 109-270) (20 U.S.C.2301, et seq.), provides grants to Indian tribes, tribal organizations, Alaska Native entities, or schools funded by the Bureau of Indian Education to support career and technical education programs. Grant funds are used for expenses associated with developing rigorous academic and technical programs, especially in preparation for high-skill, high-wage, or high-demand occupations in established or emerging professions; providing professional development to improve the quality of career and technical education teachers, principals, administrators, and counselors; and providing stipends, tuition, books, fees, childcare, counseling, job placement, transportation, supplies, specialized tools, and uniforms that are necessary for students to fully and effectively participate in career and technical education programs.

- 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 information collection is used to solicit applications for grants and to establish reporting and evaluation requirements for recipients of these grants. The Department of Education last conducted a NACTEP competition in 2018 and expects to conduct another competition in 2021. In the interim, the Department collects from grant recipients the performance data and evaluations specified in the information collection.

Responses to this collection are used in several ways. Applications submitted in response to the notice inviting applications are used to determine the eligibility of the applicant and

to determine whether the proposed project can be funded under the provisions of the authorizing statute. Peer reviewers use the information provided to assess the quality of the applications using the selection criteria set out in the information collection. The applications of applicants selected for funding are used to monitor grantee performance and adherence to the terms and conditions of the award. Grantees report their progress in carrying out the goals and objectives described in their applications, provide budget information, report on the GPRA indicators established by the collection, and submit the external evaluation reports required by the collection. This information is used to determine whether the grant recipient has made substantial progress toward meeting the project's goals and objectives according to the terms and conditions of the grant and merits a non-competitive continuation award.

- 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.**

Applications may be submitted electronically via Grants.gov; we estimate that 100 percent of applicants will submit their applications in this way. NACTEP grantees are encouraged to submit their performance reports through the G5 System, the Department's electronic grant management and performance reporting system.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The information requested does not exist elsewhere.

- 5. If the collection 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.**

Small businesses are not impacted by this data collection. To minimize burden on small organizations and small government jurisdictions, the Department encourages applicants and grantees to respond to the information collection electronically through Grants.gov and G5.

- 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 frequency of collection is keyed to the appropriation cycle. If the collection were conducted less frequently, the Department would not be able to make annual awards to grant recipients.

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.**

No such circumstances exist.

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.

This is a discretionary grant program; the Department published a 30-day Federal Register Notice seeking public comment

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

There are no payments or gifts to respondents.

- 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. 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.**

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 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. 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.**

<u>Fiscal Year</u>	<u>Estimated Number of Responses</u>	<u>Type of Staff</u>	<u>Estimated Number of Burden Hours Per Response</u>	<u>Total Estimated Number of Burden Hours</u>
2019	31	Professional Clerical TOTAL	25 (x 31grantees) 15 (x 31 grantees) 40 (x 31 grantees)	= 775 = 465 = 1240
2020	31	Professional Clerical TOTAL	25 (x 31grantees) 15 (x 31 grantees) 40 (x 31 grantees)	= 775 = 465 = 1240
2021	50	Professional Clerical TOTAL	100 (x 50 applicants) 20 (x 50 applicants)) 120 (x 50 applicants)	= 5000 = 1000 = 6000
TOTAL	112			8,480
ANNUAL AVERAGE	37		107	2,827

We expect that the Department will maintain on file the applications submitted by the 31 NACTEP grantees in 2018 and collect from them the performance information and independent evaluation reports that are described in the notice inviting applications. We estimate that preparing and submitting these data to the Department will require 40 hours per response. The total estimated number of burden hours is 1,240.

We expect that the Department will initiate a new competition for funds using this approved collection in 2021. We estimate that the Department will receive approximately 50 new applications for awards. We estimate that preparing and

submitting an application for funds will require 120 hours per response. The total estimated number of burden hours is 6,000.

Across the three fiscal years, the average estimated number of responses is 37, the average estimated number of burden hours per response is 107, and the average total estimated number of burden hours is 2,827.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

<u>Fiscal Year</u>	<u>Type of Staff</u>	<u>Estimated Hourly Wage</u>	<u>Total Estimated Number of Burden Hours</u>	<u>Total Annual Cost</u>
2019	Professional	\$42.42	775	\$32,876
	Clerical	\$16.30	465	\$7,580
	TOTAL		1,240	\$40,456
2020	Professional	\$42.42	775	\$32,876
	Clerical	\$16.30	465	\$7,580
	TOTAL		1,240	\$40,456
2021	Professional	\$42.42	5,000	\$212,100
	Clerical	\$16.30	1,000	\$16,300
	TOTAL		6,000	\$228,400
ANNUAL AVERAGE			2,827	\$103,164

Assuming an hourly rate of \$42.42 for professional staff and \$16.30 for clerical staff,¹ we estimate that the annual costs to respondents will be \$40,546 in both 2019 and 2020 and \$228,400 in 2021 when we conduct a new competition.

¹ 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 (BLS) at <https://www.bls.gov/oes/current/oes119039.htm>. The mean hourly wage for Office Clerks, General in May 2017 was \$16.30 as reported by BLS at <https://www.bls.gov/oes/2017/may/oes439061.htm>

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:

The total for the capital and start-up cost components for this information collection is zero. The information collection will not require the purchase of any capital equipment nor create any start-up costs. Computers and software used to complete this information collection are part of the respondents' customary and usual business or private practices, and therefore is not included in this estimate. The total operation and maintenance and purchase of service components for this collection 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.

The Federal costs are estimated to be approximately \$90,970 annually in each of 2019 and 2020 for the salaries of program staff who manage the grants (two GS-13 employees at \$47.38 per hour X 40 hours X 8 weeks = \$90,970). The Federal costs in 2021 are estimated to be \$138,970; these costs include the salaries of the two program staff (\$90,970) and the costs associated with the peer review of applications (\$48,000). The average annualized cost is \$106,970.

- 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).**

The current annual average burden hours for this collection are 1,240. The new annual average burden hours requested for this collection total 2,827, an increase of 1,587 hours that is caused by the need to conduct a new grant competition for this program in 2021.

- 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.**

There are no plans for publication of data from this collection.

- 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.**

There are no exceptions to the certification statement identified in the Certification of Paperwork Reduction Act.