

## 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 for extension of the approval of the information collection which solicits applications for the Native Hawaiian Career and Technical Education Program (NHCTEP). The collection request includes a notice inviting applications and an accompanying application package that were published on June 27, 2018. These documents set out the selection criteria used to assess the quality of applications, establish the Government Performance and Results Act (GPRA) indicators that grantees on which grantees must report, require grantees to support an independent evaluation of their projects, and, for any applicant that is not proposing to provide CTE directly to Native Hawaiian students, a written agreement between the applicant and the educational entity that will provide CTE directly to students.

NHCTEP, authorized by section 116 (h) of the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act (PL 115-224) (20 U.S.C.2301), provides grants to community-based organizations primarily serving and representing Native Hawaiians. Grant funds are used for expenses associated with developing challenging academic and technical standards, especially in preparation for high-skill, high-wage, or high-demand occupations in established or emerging professions; and providing technical assistance and professional development that improves the quality of career and technical education teachers, faculty, administrators, and counselors. Students may be provided stipends, tuition, books, fees, childcare, counseling, job placement, transportation, supplies, specialized tools and uniforms that are necessary 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. 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 projects' 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.

- 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.**

In Fiscal Years 2019 and 2020, the eight grantees that were awarded three-year grants in FY 2018 will submit the annual evaluation reports and performance data required by the application notice. We estimate that the burden hours associated with fulfilling this requirement is 100 hours per response. In Fiscal Year 2021, we expect to have a new competition and anticipate receiving 15 applications. The burden hours associated with submitting an application is an estimated 120 hours per response.

Fiscal Year	Estimated Number of Responses	Type of Staff	Estimated Number of Burden Hours Per Response	Total Estimated Number of Burden Hours
2019	8	Professional	100	800
2020	8	Professional	100	800
2021	15	Professional	120	1,800
TOTAL	31		320	3,400
3 Year Average	10		107	1,133

We estimate the total cost per hour of the professional staff who will carry out this work to be \$60.98 per hour, the mean hourly compensation cost for State and local government workers who were in management, professional, and related occupations in March 2019.<sup>1</sup>

<sup>1</sup> Bureau of Labor Statistics, U.S. Department of Labor, Employer Costs for Employee Compensation Historical Listing, National Compensation Survey, retrieved from <https://www.bls.gov/web/ecec/ececqrtn.pdf>

As indicated in the table below, the estimated total annualized cost to respondents will be \$207,332 and average an estimated \$69,111 over the course of the three years.

Year	Type of Staff	Total Estimated Number of Burden Hours	Estimated Hourly Cost	Total Costs
2019	Professional	800	\$60.98	\$48,784
2020	Professional	800	\$60.98	\$48,784
2021	Professional	1,800	\$60.98	\$109,764
TOTAL		3,400		\$207,332
3-Year Average		1,133	\$60.98	\$69,111

**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 annualized Federal cost is estimated to be \$17,693. The costs are comprised of time spent by one GS-13 Step 5 reviewing grantee performance reports and evaluations in all three years, plus an additional 200 hours in Fiscal Year 2021 managing the competition for new awards. In addition, the estimate includes peer review costs of \$10,000 in Fiscal Year 2021.

Year	Federal Staff	Total Estimated Number of Hours	Hourly Cost	Federal Salary Costs	Peer Review Costs	Total Costs
2019	1 GS-13	200	\$53.85	\$10,770	-	\$10,770
2020	1 GS-13	200	\$53.85	\$10,770	-	\$10,770
2021	1 GS-13	400	\$53.85	\$21,540	\$10,000	\$31,540
TOTAL		800	\$53.85			\$53,080
3-Year Average		1,200	\$53.85			\$17,693

**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).**

We estimate that the burden associated with this collection will be 67 fewer hours than the burden hours in the current inventory for this collection. The change is the result of an adjustment in re-estimating burden. The estimated burden in the current inventory assumed incorrectly that a competition for new funds would be held each year, rather than every three years.

**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.