

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. 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, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

Title II of the Workforce Innovation and Opportunity Act of 2014 (WIOA – P.L. 113-128), entitled the *Adult Education and Family Literacy Act* (AEFLA), was enacted on July 22, 2014. AEFLA creates a partnership among the Federal government, States, and localities to provide, on a voluntary basis, adult education and literacy services.¹ Section 116 of WIOA requires States and Local Areas that operate the six core programs of the workforce development system to comply with common performance accountability requirements for those programs. The core programs are: the Adult, Dislocated Worker, and Youth programs (title I, administered by the Department of Labor (DOL)); the AEFLA program (title II, administered by the Department of Education (Department or ED)); the Employment Service program authorized under the Wagner-Peyster Act program (amended by title III and administered by DOL); and the Vocational Rehabilitation (VR) program authorized under title I of the Rehabilitation Act of 1973 (amended by title IV and administered by ED). In June 2016, DOL and ED released an information collection request (ICR) – the WIOA Joint Performance Accountability Information and Reporting System (WIOA Joint Performance ICR), as required by section 116(d) of WIOA (29 U.S.C. § 3141(d)), which included the WIOA Annual Statewide Performance Report jointly developed by ED and DOL (Office of Management and Budget (OMB) Control No. 1205-0526). This vehicle facilitates State and local collection and reporting of common performance data with respect to the core programs, consistent with the requirements of section 116 of WIOA. In June 2019, OMB approved a non-material change to the WIOA Joint Performance ICR.

In addition to the WIOA Joint Performance ICR, ED's Office of Career, Technical, and Adult Education (OCTAE) modified its previously-approved ICR, used by States for performance reporting under the Workforce Investment Act of 1998 (WIA) through the National Reporting System for Adult Education (NRS), as a non-substantive change package to conform to the performance accountability requirements under WIOA. The NRS ICR (OMB Control No. 1830-0027) obtains aggregate data annually from States using a set of instruments developed by ED. For purposes of the AEFLA program, States are required to complete and submit annually to OCTAE the WIOA Annual Statewide Performance Report and the Measurable Skill Gains Report of the Joint Performance ICR and the aggregate performance data tables, data quality checklist, narrative report, and financial reports of the NRS ICR under OMB Control No. 1830-0027.

¹ The *Workforce Innovation and Opportunity Act of 2014* can be found at the following link: <https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf>.

Through this proposal, the Department is submitting a revised NRS ICR to include additional data collection elements consistent with the WIOA performance accountability requirements for the AEFLA program. These new data collection elements will become effective on July 1, 2021 and required to be included in the annual performance reports due on October 1, 2021.

This NRS ICR contains 18 performance tables, two of which are required only for States that offer distance education; one optional table; one data quality checklist, one narrative report, and two financial reports. The performance tables are included in the document titled “NRS ***instrument 1 - Performance Tables.***” States include in the performance tables all participants in programs:

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

The Department also requires the collection of this information pursuant to the Government Performance and Results Act of 1993 (GPRA) and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR part 200 (Uniform Guidance).

GPRA. GPRA requires each Federal agency to develop strategic goals and objectives 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 OCTAE assess progress of adult learners in acquiring basic foundation skills (including adult basic education and English language acquisition), follow-up outcome measures related to completion of secondary education, transition to postsecondary education or training, and employment, along with other efficiency measures. OCTAE plans to obtain this information from this revised data collection package.

EDGAR. In addition to the accountability requirements contained in AEFLA, the Uniform Guidance requires grantees to submit performance reports not more frequently than quarterly or less frequently than annually (2 CFR § 200.328(b)(1)). Those regulations also require grantees to submit financial status reports not more frequently than quarterly or less frequently than annually (2 CFR § 200.327).

In November 2017, OMB most recently approved the data collection required by AEFLA (OMB 1830-0027) by approving non-substantive changes that conformed to the performance accountability requirements in section 116 of WIOA. OCTAE is requesting an extension of this approval with the following two non-substantive modifications which can be found on page 8 of the reporting instructions and forms:

- **Revisions to Table 4 “Measurable Skill Gains by Entry Level”** – In our response to public comments on March 22, 2017, we announced our intention to use the data reported by states on Table 11 of this ICR to determine whether additional types of measurable skill gain (MSG) should be identified for performance accountability. As a result, we

have added two new columns to report MSG outcomes for participants in the Integrated Education and Training (IET) program. The table instructions have been revised to include information about the new columns. In addition, the table instructions were revised to clarify that periods of participation excluded from MSG performance due to the exclusion scenarios listed in OCTAE Program Memorandum 17-2 Attachment 2, Table A, should not be included in columns K-N. No increased burden is required for this table revision, due to the new NRS website application enhancements launched in September 2019 and discussed on page 5 (under item 3) of this supporting statement.

- **New Table 99 “Indicator Denominators for the Statewide Performance Report”** – This table collects the number of participants included in the denominators for each indicator on the Statewide Performance Report (SPR). It will be incorporated into the “Edit” screen of the NRS website application’s SPR reporting grid to facilitate efficient and accurate data entry. The data in this table will be used for intra- and inter-table system validations and to automatically calculate the performance values for each indicator on the SPR, thereby eliminating the need for respondents to enter the rates for each indicator. Thus, no increased burden is required for this change.

The current NRS ICR (OMB Control No. 1830-0027), which was approved November 29, 2017, is effective until November 30, 2020.

- 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 WIOA requirements outlined in Sections 116 and 242 and to ensure our compliance with GPRA.

Section 116

The Department will use the information received from the current collection to fulfill the performance accountability reporting requirements in Section 116 of WIOA and OCTAE’s reporting requirements under GPRA. Section 116 requires the WIOA core programs to report annually on information related to the primary performance indicators, participant counts and costs, and individuals with barriers to employment. State data must be made publicly available through the WIOA Annual Statewide Performance Report Template (in the WIOA Joint Performance ICR), which is reported to OCTAE on an aggregate basis. For the AEFLA program, States are also required to submit aggregate data tables in the revised NRS ICR to OCTAE under OMB Control No. 1830-0027.

The Departments will use the data collected to assess the effectiveness of WIOA’s core programs and to monitor and analyze the performance of their grantees. If States fail to submit performance reports or to meet the adjusted level of performance as described in 34 CFR §§ 463.185 and 463.190, they may be subject to a sanction of five or ten percent, as described in 34 CFR § 463.195, which implements section 116(f) of WIOA. In addition, ED is required to provide technical assistance to States that fail to meet adjusted levels of performance for any program year.

Section 242

Section 242 of WIOA requires the Department to 1) provide technical assistance to help States meet the requirements of section 116, 2) upon a State's request, provide assistance to local AEFLA programs in using performance accountability measures based on the performance indicators in section 116 and data systems for the improvement of adult education and literacy activities, 3) carry out rigorous research and evaluation on effective adult education and literacy activities, and 4) carry out an independent evaluation at least once every four years. The Department will use the information reported through this revised NRS ICR and the WIOA Joint Performance ICR to identify which States have not reached acceptable levels of performance and may need technical assistance 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.

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 assess progress of adult learners in acquiring basic foundation skills (including adult basic education and English language acquisition), follow-up outcome measures related to completion of secondary education, transition to postsecondary education or training, and employment, along with other efficiency measures. OCTAE plans to obtain this information on participant outcomes from the revised NRS ICR that is the subject of this OMB data collection 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. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

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 revised data collection 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 which 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 make 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. The web-based reporting system allows States to submit statistical, financial, and narrative reports electronically, in an integrated, seamless fashion.

In September 2019, OCTAE launched a substantially enhanced NRS website into production using state of the art technology in compliance with current IT security requirements. Whereas the previous website required respondents to manually enter data into each table, the new NRS website application enables respondents to cut and paste entire data tables directly into the system, thereby offsetting a potential increase in burden associated with the proposed table revisions in this collection and considerably increasing the accuracy of the data. Thus, the burden hours for this collection remain the same. While there are many user-friendly and time-saving features of the new NRS website, respondents have provided overwhelmingly positive feedback about the substantial reduction of hand entered data.

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.

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 to 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 requirements in section 116(d) of WIOA that the core

programs submit an annual report to Congress on the extent to which States have met their agreed-upon adjusted levels of performance, the requirement in section 243 that OCTAE submit an annual report to Congress on the activities carried out in the IELCE program, as well as the requirement in section 225 that each State eligible agency using funds to carry out programs of corrections education annually submit a report to the Secretary of Education on their progress in providing activities under this section. The Department would also be in noncompliance with GPRA reporting requirements if this information could not be collected to develop performance reports. Failure to collect the required performance data could have an impact on a State's receipt of Federal funds under WIOA, and/or be a determining factor for a financial sanction on the State pursuant to WIOA Sec. 116(f). Moreover, such failure could impede the Departments' efforts to ensure compliance with Federal performance accountability requirements, thereby affecting the Departments' ability to safeguard the Federal interest.

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 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.

Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30 day notice, indicate that a notice will be published. 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.

Through this ICR, the Department solicited public comments on this information collection by publishing a 60-day Federal Register Notice in 85 FR 44528 on July 23, 2020. 21 public comments were received in response to the 60-day notice. The comments covered a range of programmatic topics related to this information collection. Several non-substantive comments were also received in response to the 60-day notice. Our responses to the public comments, both substantive and non-substantive are contained in the document “1830-0027 Responses to Public Comments Received During the 60-Day Notice (November 2020).” In response to public comments received, we made the following changes to the instrument that do not change the estimated burden hour:

- **Change to Table 4 “Educational Functioning Level Gain and Attendance for Pre- and Post-tested Participants”** – Several commenters questioned whether the proposed changes should be effective for program year 2020 data reported on October 1, 2021. They emphasized that States would need time for training, updates to data collection systems, data-sharing agreements, and consideration of parallel changes needed on other tables. We have added a footnote to Table 4 that States may use columns G and N to report data for program year 2020 performance data due on October 1, 2021, but it is not required. For program year 2021 performance data due on October 1, 2022, the use of columns G and N would be required.
- **Change to Table 4b “Educational Functioning Level Gain and Attendance for Pre- and Post-tested Participants”** – Commenters requested clarification that Table 4b is to be used to only for participants who have received a pre-test and post-test. We have revised

Table 4b to include an additional instruction for column B that the table is for reporting participants who have received a pretest and posttest.

- **Change to Table 4c “Measurable Skill Gains by Entry Level for Participants in Distance Education”** – Commenters proposed updating Table 4c to include the full complement of WIOA MSG types, as has been proposed in this information collection for Table 4. We have revised Table 4c to include the same columns as Table 4. Consistent with the public comments received for Table 4, we have added a footnote to Table 4 that States may use columns G and N to report data for program year 2020 performance data due on October 1, 2021, but it is not required. For program year 2021 performance data due on October 1, 2022, the use of columns G and N would be required.
- **Technical edits to the Narrative Report** – We made corrections to statutory citations and other technical edits in the instrument.

Through this ICR, the Department will solicit public comments on this information collection by publishing a 30-day Federal Register Notice.

OCTAE annually convenes a technical work group (TWG) comprised of State representatives and representatives from adult literacy organizations. We have consulted the TWG members on accountability policy issues and logistical aspects of the NRS data collection process, including the design and implementation of this information collection. The technical work group also informs the development of the regional NRS training offered annually to States.

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

The respondents will not receive any payments or gifts 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 IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.² 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. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden**

² 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)

Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.

As proposed in this revised data collection, the data collected by States and submitted to the Department 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.

- 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.**

None of the data collected in the NRS is sensitive in nature.

- 12. Provide estimates of the hour burden for this current information collection request. The statement should:**
 - **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
 - **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
 - **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. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
 - **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. 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. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.

WIOA and the Uniform Guidance require eligible agencies to submit Annual Performance Reports to demonstrate continuous improvement in the delivery of their approved State Plan. The estimated burden associated with the changes in this data collection extension proposal is counterbalanced by the increased efficiencies and automation that reduce the burden of using OCTAE’s online performance reporting system. Specifically, since the last renewal of this data collection, OCTAE has introduced a significant number of enhancements to the NRS website that reduce burden such as:

- Introducing dynamic data entry capabilities that now facilitate the copying and pasting of large grids of table data into performance tables and financial reports. *(For more discussion about the benefits of this feature, please see the response to item 3 on page 5 of this supporting statement.)*
- Increasing the number of automatically calculated cells in the statistical tables and financial reports.
- Increasing the number of automatically populated cells in the financial reports.
- Increasing the number of data validations in the statistical tables, financial reports, and data quality checklist to eliminate or reduce state staff hours making subsequent corrections.
- Introducing secure electronic signature capability for the financial reports and data quality checklist, thus eliminating the need to sign by hand, scan forms, and manually upload to the federal data system.

Additional reporting system enhancements, such as those listed above, will continue to be made to reduce burden for reporting. Thus, OCTAE estimates 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.

The estimated average burden hours are 100 hours per response in each of the three years (2021 – 2023) for a total estimate of 5,700 burden hours each year and a total estimate of 17,100 over the entire three years.

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2020-21	57	Professional Data Entry	80 20 = 100 hours	4560 1140 =5700 hours
2021-22	57	Professional Data Entry	80 20 =100 hours	4560 1140 =5700 hours
2022-23	57	Professional Data Entry	80 20 =100 hours	4560 1140 =5700 hours

Hour Burden Estimates for Each Instrument

Instrument 1 – Performance Tables

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2020-21 Performance Tables	57	Professional Data Entry	24 10 = 34 hours	1368 570 =1938 hours
2021-22 Performance Tables	57	Professional Data Entry	24 10 = 34 hours	1368 570 =1938 hours
2022-23 Performance Tables	57	Professional Data Entry	24 10 = 34 hours	1368 570 =1938 hours

Instrument 2 – Data Quality Checklist

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2020-21 Data Quality Checklist	57	Professional Data Entry	4 0 = 4 hours	228 0 =228 hours
2021-22 Data Quality Checklist	57	Professional Data Entry	4 0 = 4 hours	228 0 =228 hours
2022-23 Data Quality Checklist	57	Professional Data Entry	4 0 = 4 hours	228 0 =228 hours

Instrument 3 – Narrative Report

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
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2020-21 Narrative Report	57	Professional Data Entry	32 0 = 32 hours	1824 0 =1824 hours
2021-22 Narrative Report	57	Professional Data Entry	32 0 = 32 hours	1824 0 =1824 hours
2022-23 Narrative Report	57	Professional Data Entry	32 0 = 32 hours	1824 0 =1824 hours

Instrument 4a and 4b – Financial Reports

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2020-21 Financial Reports	57	Professional Data Entry	20 10 = 30 hours	1140 570 =1710 hours
2021-22 Financial Reports	57	Professional Data Entry	20 10 = 30 hours	1140 570 =1710 hours
2022-23 Financial Reports	57	Professional Data Entry	20 10 = 30 hours	1140 570 =1710 hours

After increasing the hourly rate of both labor categories from the rates used for this estimate, the cost per response for the professional labor is \$2,320 (80 hours times an hourly rate of \$29/hr) and the cost per response for the data entry is \$360 (20 hours times an hourly rate of \$18/hr). These hourly wage rates are based on data in the Bureau of Labor Statistics *May 2019 National Occupational Employment and Wage Estimates*, as shown in the following table.

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
State Office Professional	N/A	N/A	57	57	80	4,560	\$29 ³	\$132,240

³ Mean hourly wage (rounded up from \$28.91) for first-line supervisors of office and administrative support workers, occupational code 43-1011. Source: U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2019, <https://www.bls.gov/oes/current/oes431011.htm>.

State Office Data Entry	N/A	N/A	57	57	20	1,140	\$18 ⁴	\$20,520
Annualized Totals			x	x	100	5,700	x	\$152,760

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

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 : \$0

⁴ Mean hourly wage (rounded down from \$18.41) for office and administrative support workers, occupational code 43-9199. Source: U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2019, <https://www.bls.gov/oes/current/oes439199.htm>.

Total Annual Costs (O&M) : \$0
Total Annualized Costs Requested : \$0

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 \$75,000 for software revisions and testing.

Program Office Staff

The total estimated Federal cost for program office staff is \$374,272 over three years and is calculated as follows:

Program Office Staff	Estimated Number of Hours Per Year	FY 2016 Hourly Rate	Estimated Cost Per Year	Total Cost for Three Years
GS-13	240	\$49.19	\$11,806	\$35,417
GS-13	240	\$49.19	+\$11,806	+\$35,417
GS-14	240	\$58.13	+\$13,951	+\$41,854
GS-14	1,500	\$58.13	+\$87,195	+\$261,585
			<u>=\$124,757</u>	<u>=\$374,272</u>

The total Federal costs are estimated to be \$449,272 over three years, with an average annual cost of \$149,757. This includes software development and beta testing, web site maintenance,

and the salaries and expenses of program and IT staff who manage the process. The average annual Federal cost is calculated as follows:

	\$75,000	Software Modification Costs
+	<u>\$374,272</u>	Federal Program Office Staff Costs
	\$449,272	Total Federal Costs for Three Years
÷	3	Divided by 3 Years
=	<u>\$149,757</u>	Average Annual Federal Costs

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).

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

As proposed in the response to item 1 of this supporting statement, this request to extend the approval of this information collection contains non-substantive changes in order to obtain a more accurate reporting of participants served in the various AEFLA activities, services, and programs that support the purposes of AEFLA. These changes will not increase burden, as they are offset by reductions to burden discussed in the responses to items 1 and 3 of this supporting statement.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden	N/A	0	0
Total Responses	N/A	57	0
Total Costs (if applicable)	N/A	N/A	N/A

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 will be made accessible to the public through an annual report published on: <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/accountability-reporting.html#spr>. There are no complex analytical techniques used for the publication of these reports. 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.