

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.<sup>1</sup> 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-Peyser 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 May 2021, OMB approved a 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), 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, assessment policy, and financial reports of the NRS ICR under OMB Control No. 1830-0027.

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<sup>1</sup> 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 renewal request, the Department is proposing revisions to the NRS ICR. Records for this information collection must be kept in compliance with 2 CFR 200.334.

This NRS ICR contains 18 performance tables, one data quality checklist, one narrative report, one state assessment policy, two financial reports (initial and final), and two recipient share reports (initial and final). All annual reporting components are included in the document titled “*NRS instrument (1830–0027 November 2023)*.” 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 under 34 CFR 75.110. and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR part 200 (Uniform Guidance).

Under 34 CFR 75.110, the Department establishes performance measurement requirements. The 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 efficiency measures. OCTAE plans to obtain this information from this revised data collection package.

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).

This information collection, which was approved by OMB on February 4, 2021, is effective until February 29, 2024. OCTAE is requesting an extension of this data collection with the following proposed revisions, including those made in response to public comments received during the 60-day Federal Register notice, which are designed to increase the accuracy of the data submitted and can be found in the document named “*NRS instrument (1830–0027 November 2023)*.”

- **New Categories Available for Reporting Participant Sex on Tables 1, 2, and 2A**

Two new categories for reporting participant sex are added:

1. Non-binary: The participant identifies with being nonbinary or another gender.
2. No Answer: The participant prefers not to answer.

- **New Option for Educational Functioning Level (EFL) Placement of Participants on Tables 1, 4, 4A, and 4C with clarifying language revisions**

Alternative ABE/ESL placement:

At the State's sole discretion, and as documented in the State's assessment policy, States may exempt participants from NRS pre- and post-testing who are enrolled in programs designed to yield the following outcomes under the Measurable Skill Gains (MSG) indicator, as described in OCTAE Program Memorandum 17-2:

MSG Outcome Type:

1. b) Awarding of credits or Carnegie units.
1. c) Enrolled in postsecondary education and training after exit.
2. Documented attainment of a secondary school diploma or its recognized equivalent.
3. Secondary or postsecondary transcript or report card for sufficient credit hours that shows a participant is meeting the state unit's academic standards.
4. Satisfactory or better progress report, toward established milestones, from an employer or training provider who is providing training.
5. Successfully passing an exam that is required for a particular occupation or progress in attaining technical or occupational skills, as evidenced by trade-related benchmarks.

Examples of such programs may include, but are not limited to, integrated education and training<sup>2</sup> programs, workplace literacy programs, preparatory classes for high school equivalency testing, postsecondary bridge programs, adult high schools utilizing credits or Carnegie units, or other adult education programs designed to yield the MSG outcomes listed above. For these types of programs, States may develop and implement alternative options for the EFL placement. For example, a state may use assessments that are content-driven or performance-driven such as locator tests, criterion referenced tests, diagnostic assessments, authentic assessments, or a state may choose to develop and implement innovative crosswalks between program benchmarks and NRS EFL levels. The reporting of outcomes for participants in such programs must follow the data collection and validation requirements for the specific MSG type, as described in OCTAE Program Memorandum 19-1. States are not required to exempt participants from pre- and post-testing and may continue to use assessment procedures that best meet the needs of the State's adult education program. Students with an alternative placement are reported on the "Alternative Placement" rows under ABE or ESL.

NOTE for MSG type 1a (educational gain via pre- and post-testing): Consistent with 34 CFR 462.41(a), in programs that compare the participant's initial EFL, as measured by a pre-test, with the participant's EFL, as measured by a post-test, States must measure this specific type of educational gain (MSG type 1a) using only tests that the Secretary has determined are suitable for use in the NRS and the state has identified in its assessment policy.

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<sup>2</sup> The term "integrated education and training" means a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement (Sec. 203(11) of WIOA). Such programs include workforce preparation components that help participants acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills.

- **Consolidation of Rows on Tables 5, 5A, 8, 9, 10, 11**

To provide greater clarity for reporting secondary school diploma outcomes and to improve the accuracy and efficiency of data entry, two rows are combined into one row on table 5 and renamed “*Attained a Secondary School Diploma/Recognized Equivalent and Employed or Enrolled in Postsecondary Education or Training within one year of exit.*”

- **Revised Column Headings and New Reporting Rows on Table 14**

- The column headings are revised by type of subrecipient funding (i.e., sections 231, 243) to clarify in which column to report certain types of providers. An existing total column is deleted and a new automatically calculated column is added, which the NRS database will populate with the total number of providers.
- A new row is added to accommodate the reporting of tribal organizations, which States had previously reported on the “other” row.
- A new row is added to enter the Uniform Resource Locator (URL) or web address where the State’s online listing of all providers is publicly available.

- **Proposals for Uniform Distance Education Reporting Criteria for Tables 4C and 5A**

Public comments submitted during the 60-day Federal Register Notice express support for additional stakeholder engagement to develop a definition of distance education that can be operationalized in all states for nationally standardized NRS reporting. In response to comments received through this process, OCTAE will begin to conduct such consultations with a broad adult education audience upon conclusion of this ICR renewal.

- **Revision of Narrative Report Instructions**

The instructions for the narrative report have been revised with clarifying edits to better assist States in writing their annual report. One instruction is added to facilitate a focused description of the State’s Integrated Education and Training (IET) program. The maximum number of pages remains at 10.

### **Implementation Timeline for Proposed Revisions**

The proposed revisions would become effective on July 1, 2024, and implemented according to the following timeline:

- New Categories Available for Reporting Participant Sex on Tables 1, 2, and 2A
  - Available for reports submitted on October 1, 2024, and for program years thereafter.
- New Option for Educational Functioning Level Placement of Participants on Tables 1, 4, 4A, and 4C
  - State’s discretion, beginning with annual reports submitted on October 1, 2024, and for program years thereafter.

- Consolidation of Rows on Tables 5, 5A, 8, 9, 10, 11
    - Required for reports submitted on October 1, 2024.
  - Revised Column Headings and New Reporting Rows on Table 14
    - Required for reports submitted on October 1, 2024.
  - Proposals for Uniform Distance Education Reporting Criteria for Tables 4C and 5A
    - Consultative process after the conclusion of this ICR renewal.
  - Revision of Narrative Report Instructions
    - Flexible rollout for reports submitted on December 31, 2024. The implementation of the revised narrative report prompts will afford considerable flexibility to respondents. States will continue to have broad latitude to write a narrative report that reflects the state's adult education program implementation. States will not be required to address new prompt language for which the State did not have sufficient time to prepare.
    - By December 2025, states will have had sufficient time to become familiar with the revised language and will be required to address all prompts.
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.

#### **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 EDGAR. 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.

### **Performance Reporting under EDGAR**

OCTAE's approved 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 significantly streamlining data entry procedures associated with this collection and considerably increasing the accuracy of the data. In recent years, as new user-friendly and time-saving features continue to be introduced to the NRS website, respondents have provided overwhelmingly positive feedback about the substantial reduction of data entered manually. Any potential increase in burden associated with the proposed table revisions in this collection are offset by commensurate changes to other data elements and technological system efficiencies. Thus, the burden hours for this collection remain the same.

**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 does 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 performance reporting requirements if this information could not be collected to develop performance reports. Failure to collect the required performance data would have an impact on a State's receipt of Federal funds under WIOA and would 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 renewal, the Department solicited public comments on this information collection by publishing a 60-day Federal Register Notice (88 FR 48229). The ICR received 43 comments. OCTAE revised the NRS collection in response to comments and provided a detailed response to comments as a supplementary document.

On November 28, 2023, the Department solicited public comments on this information collection by publishing a 30-day Federal Register Notice (88 FR 83106) prior to submission to OMB. Five comments were submitted in response to the 30-day notice. OCTAE responded to the comments but made no additional changes.

OCTAE regularly 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.<sup>3</sup> 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 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.**

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<sup>3</sup> 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 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 proposed changes in this data collection extension proposal is counterbalanced by the increased efficiencies and automation that facilitate the timesaving use of OCTAE’s online performance reporting system. Specifically, OCTAE has introduced a significant number of enhancements to the NRS website such as:

- Introducing dynamic data entry capabilities that facilitate the copying and pasting of large data tables into performance tables and financial reports.
- 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 support efficient 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 (2023 – 2026) for a total estimate of 5,700 burden hours each year and a total estimate of 17,100 over the entire three years.

Summary Burden for Three Years

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2023-24	57	Professional Data Entry	80 20 = 100 hours	4560 1140 = 5700 hours
2024-25	57	Professional Data Entry	80 20 =100 hours	4560 1140 = 5700 hours
2025-26	57	Professional Data Entry	80 20 =100 hours	4560 1140 = 5700 hours

Hour Burden Estimates for Each Instrument Component

Instrument Component – Performance Tables

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2023-24 Performance Tables	57	Professional Data Entry	23 10 = 33 hours	1311 570 = 1881 hours
2024-25 Performance Tables	57	Professional Data Entry	23 10 = 33 hours	1311 570 = 1881 hours
2025-26 Performance Tables	57	Professional Data Entry	23 10 = 33 hours	1311 570 = 1881 hours

Instrument Component – Data Quality Checklist

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2023-24 Data Quality Checklist	57	Professional Data Entry	4 0 = 4 hours	228 0 = 228 hours
2024-25 Data Quality Checklist	57	Professional Data Entry	4 0 = 4 hours	228 0 = 228 hours

2025-26 Data Quality Checklist	57	Professional Data Entry	4 0 = 4 hours	228 0 = 228 hours
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Instrument Component – Narrative Report

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2023-24 Narrative Report	57	Professional Data Entry	32 0 = 32 hours	1824 0 =1824 hours
2024-25 Narrative Report	57	Professional Data Entry	32 0 = 32 hours	1824 0 =1824 hours
2025-26 Narrative Report	57	Professional Data Entry	32 0 = 32 hours	1824 0 =1824 hours

Instrument Component – Assessment Policy

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2023-24 Assessment Policy	57	Professional Data Entry	1 0 = 1 hours	57 0 = 57 hours
2024-25 Assessment Policy	57	Professional Data Entry	1 0 = 1 hours	57 0 = 57 hours
2025-26 Assessment Policy	57	Professional Data Entry	1 0 = 1 hours	57 0 = 57 hours

Instrument Component – Financial Reports

Program Year	Number of Responses	Type of State Staff	Average Burden Hours per Response	Total Average Burden Hours for All Responses
2023-24 Financial Reports	57	Professional Data Entry	20 10 = 30 hours	1140 570 =1710 hours
2024-25 Financial Reports	57	Professional Data Entry	20 10 = 30 hours	1140 570 =1710 hours

2025-26 Financial Reports	57	Professional Data Entry	20 10 = 30 hours	1140 570 =1710 hours
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After adjusting the hourly rate of both labor categories used for this estimate, the cost per response for the professional labor is \$2,480 (80 hours times an hourly rate of \$31/hr.) and the cost per response for the data entry is \$420 (20 hours times an hourly rate of \$21/hr.). These hourly wage rates are based on the most recent data from the Bureau of Labor Statistics **May 2022 National Occupational Employment and Wage Estimates**, as shown in the following table and cited in the footnotes 3 and 4.

**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	\$31 <sup>4</sup>	\$141,360
State Office Data Entry	N/A	N/A	57	57	20	1,140	\$21 <sup>5</sup>	\$23,940
Annualized Totals			x	x	100	5,700	x	\$165,300

*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;**

<sup>4</sup> Mean hourly wage (rounded down from \$31.49) 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 2022, <https://www.bls.gov/oes/current/oes431011.htm>.

<sup>5</sup> Mean hourly wage (rounded up from \$20.75) for office and administrative support workers, occupational code 43-9199. Source: U.S. Bureau of Labor Statistics, Occupational Employment and Wages, May 2022, <https://www.bls.gov/oes/current/oes439199.htm>.

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.**

<b>Total Annualized Capital/Startup Cost</b>	<b>:</b>	<b>\$0</b>
<b>Total Annual Costs (O&amp;M)</b>	<b>:</b>	<b>\$0</b>
<b>Total Annualized Costs Requested</b>	<b>:</b>	<b>\$0</b>

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 capital equipment nor create start-up costs. Computers and software used to complete this information collection are part of the respondents' customary and usual business 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 \$125,000 for software revisions and testing.

**Program Office Staff**

The total estimated Federal cost for program office staff is \$408,390 over three years and is calculated as follows:

Program Office Staff	Estimated Number of Hours Per Year	FY 2023 Hourly Rate	Estimated Cost Per Year	Total Cost for Three Years
GS-13	240	\$53.67	\$12,881	\$38,643
GS-13	240	\$53.67	+\$12,881	+\$38,643
GS-14	240	\$63.43	+\$15,223	+\$45,669
GS-14	1,500	\$63.43	+\$95,145	+\$285,435
			<u>=\$136,130</u>	<u>=\$408,390</u>

The total Federal costs are estimated to be \$533,390 over three years, with an average annual cost of \$177,797. 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:

	\$125,000	Software Modification Costs
+	<u>\$408,390</u>	Federal Program Office Staff Costs
	\$533,390	Total Federal Costs for Three Years
÷	3	Divided by 3 Years
=	<u>\$177,797</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 activities, services, and programs that support the purposes of AEFLA. The changes are offset by commensurate changes to other data elements and technological system efficiencies. They are not estimated to increase burden.

	<b>Program Change Due to New Statute</b>	<b>Program Change Due to Agency Discretion</b>	<b>Change Due to Adjustment in Agency Estimate</b>
<b>Total Burden</b>	N/A	<b>0</b>	<b>0</b>
<b>Total Responses</b>	N/A	<b>0</b>	<b>0</b>
<b>Total Costs (if applicable)</b>	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 at <https://www2.ed.gov/about/offices/list/ovae/pi/AdultEd/accountability-reporting.html>. 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.