

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 copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The purpose of this information collection package, the Consolidated Annual Report (CAR), is to gather narrative, financial, and performance data as required by the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV). Section 113(c) of Perkins IV requires each eligible agency that receives an allotment under section 111 of Title I of the Act (State basic grant) to annually prepare and submit, to the Secretary, a report regarding the progress of the State in achieving the State adjusted levels of performance on the core indicators of performance and additional indicators of performance. This includes the levels of performance for special population categories described in section 3(29) of Perkins IV and other student categories described in section 1111(h)(1)(C)(i) of the Elementary and Secondary Education Act of 1965, as amended by the No Child Left Behind Act (NCLB) of 2001. Finally, section 205 of Perkins IV requires each eligible agency that receives a tech prep allotment under section 201 of Title II of the Act (tech prep grant) to annually prepare and submit, to the Secretary, a report on the effectiveness of these programs, including a description of how tech prep grants were awarded within the State. The CAR is a single reporting instrument that combines the requirements referenced above with the required annual interim and final financial status reports pursuant to the Education Department General Education Regulations (EDGAR) in 34 CFR §80.41.

Perkins IV, signed into law on August 12, 2006, represents nearly three years of work on the part of Congress and the Department,

in cooperation with other Federal agencies, the State, and local agencies affected by its policies. It provides Federal support for rigorous career and technical education (CTE) programs that provide students with knowledge and skills to keep the United States competitive. The Department distributes approximately one billion dollars annually in Perkins funding to the 50 States, the District of Columbia, Puerto Rico, and the outlying areas, such as Guam, Palau, and the Virgin Islands (collectively referred to as the "States"). Each State distributes funds to eligible recipients, such as local educational agencies (LEAs) and postsecondary institutions, in order to develop the academic, career, and technical education knowledge and skills of secondary and postsecondary education students who elect to enroll in career and technical education programs. Perkins IV indicates that one of its purposes is to build on the work of States' efforts to assist CTE students in achieving challenging academic and technical standards, and preparing them for high skill, high wage, or high demand occupations in current or emerging professions. Perkins IV provides increased focus on the academic achievement of CTE students, improvement in State and local accountability, and strengthened connections between secondary and postsecondary education delivery systems. These themes serve as the general framework for the revised CAR instrument.

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.

The information gathered through this package will be used in a variety of ways. First, narrative and financial information will be reviewed by the Office of Vocational and Adult Education (OVAE), Division of Academic and Technical Education (DATE), to determine each State's compliance with basic provisions of Perkins IV and the Education Department General Administrative Regulations (34 CFR Part 80.40 [Annual Performance Report] and Part 80.41 [Financial Status Report]). For example, States are required to implement specific leadership activities in their State as well as to spend certain percentages of their funding to meet the academic and technical skill needs of various student populations (i.e. individuals preparing for nontraditional careers and individuals in State institutions).

Second, DATE staff will review performance data to determine whether, and to what extent, each State has met its State adjusted levels of performance for the core indicators described in section 113(b)(4) of Perkins IV. A State that did not meet at least 90 percent of the adjusted levels of performance for any of the core indicators described in section 113(b)(4) of Perkins IV is required to develop and submit, as part of its CAR report, a program improvement plan with special consideration to the performance gaps identified under section 113(c)(2) of Perkins IV. The improvement plan must address each core indicator(s) that a State failed to meet; disaggregated categories of students for which there were quantifiable disparities or gaps in performance compared to all students or any other category of students; steps that will be implemented, beginning in the current program year; staff members in the State who are responsible for each action step; and the timeline for completing each action step. DATE staff will review these plans in order to determine whether they are thorough and appropriate in addressing the indicator(s) that were not met at the 90 percent level.

Third, section 113(c)(3)(C) of Perkins IV requires the Secretary to provide the appropriate committees of Congress copies of annual reports received by the department from each eligible agency that receives funds under the Act. Section 113(c)(3)(A) further requires the Secretary to make the information contained in such reports available to the general public. To meet this obligation, DATE compiles the CAR data into an annual report to Congress and makes the data available to the public online through the Peer Collaborative Resource Network at <http://cte.ed.gov>.

Fourth, DATE charts its own progress in helping States to improve the educational and employment outcomes for students who pursue career and technical education by setting annual performance targets for each of the core indicators of performance in section 113(b). Targets and performance data are entered annually into the Department's Program and Performance Management Database (PPMD)

Finally, DATE staff uses annual CAR information to determine which States will be monitored for an upcoming year or which States could benefit from technical assistance in particular areas. Annual CAR reviews have resulted in the identification of topics for annual Data Quality Institutes (DQIs), as well as the decision to offer customized technical assistance to States on

accountability issues. This strategy has been well-received by the States and is deemed by OVAE, effective in improving the reliability and validity of the Perkins data.

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 of using information technology to reduce burden.

Each State has several options in submitting its CAR report. A State may submit its report electronically via the Department's CAR Web site at www.PerkinsCAR.com. This Web site allows a State to complete its CAR report using Web-based or Excel forms and to certify to the accuracy and completeness of its submission using electronic Personal Identification Numbers (PINs). The State CTE director must then use one PIN to certify and sign the entire CAR submission. The authorized State official responsible to certify and sign Financial Status Reports (FSR) must use another PIN. It is important to note that the use of the PINs to certify and sign the CAR and FSRs is the same as certifying the documents with a hand-written signature by the State official. State officials are responsible for protecting the confidentiality of their PIN and for any use of their PIN by another individual. DATE encourages this option for submitting the CAR under Perkins IV.

Alternatively, a State may submit its report via an e-mail attachment to a Perkins CAR mailbox at PerkinsCAR2011@ed.gov. A State that chooses this option must e-mail a signed pdf version of the report to the mailbox and send paper copies of any pages requiring a certification and signature to the address below.

Finally, a State may opt to make a paper copy submission. A State that chooses this option must send a certified and signed original and one copy of the report to the address specified in the information package.

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

This information gathered as part of this collection is not required to be submitted to any other office within the Department of Education.

5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.

This collection does not impact small business.

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.

Without the information gathered through the CAR, the Department would be unable to determine whether, and to what extent, States were complying with the Perkins IV legislation or other applicable federal regulations. The Department would be unable to sufficiently review each State's progress in meeting its adjusted levels of performance, much less determine its own effectiveness in helping States to achieve the purposes of the Act. The statute dictates the frequency of collection and the types of information that must be collected.

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 which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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.

A 60-Day and 30-Day Federal Register Notice published for CAR.

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

The respondents will not receive any payment or gift 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.

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, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 item 16 of IC Data Part 1.

- 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 not be included in Item 14.

With both Professional and Clerical staff completing the CAR, total annual burden hours for this extension are 10,700 hours.

Program Year	Estimated Number of Responses	Type of Staff	Estimated Number of Burden Hours Per Response	Total Estimated Number of Burden Hours
2011-2012	55	Professional	112	6,160
		Clerical	82	4,540
		TOTAL		
ANNUAL AVERAGE	55		194.5	10,700

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.)

There are no costs to respondents for the capital and start-up cost components for this information collection. 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 are not included in this estimate.

There are also no costs to respondents for the total operation and maintenance and purchase of service components for this information.

The information collection will create minimum cost to the States to generate, compile, maintain, and disclose the information.

- 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 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.

Total Annualized Capital/Startup Cost	:	\$.00
Total Annual Costs (O&M)	:	.00
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Total Annualized Costs Requested	:	\$.00

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 annual cost to the Federal government to implement this information collection is estimated at \$40,080. This includes contractor beta testing and web site maintenance, and the salaries and expenses of DATE program staff who manage the process and review the CAR data. The method used to estimate the annual cost is as follows:

Program Office Staff:

1 GS-12	X	240 hours	= \$ 6,400
1 GS-15	X	120 hours	= \$ 3,680
Total Program Office Staff:			= \$10,080

Contractor Staff: = \$30,000

ESTIMATED FEDERAL COST = \$40,080

15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.

There are no changes to CAR.

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.

An annual report to Congress is prepared and published using the information collected in the CAR instrument. Below is the general schedule for production:

Task	Timeline
States submit CAR data	December 31 (deadline for reporting each year)
DATE staff review State's CAR submissions	January 1 – March 15
States receive notification on the approval of their CAR submissions	March 15
DATE staff, in collaboration with contractors, tabulate data and prepare individual State profiles	March 15 – April 15
DATE staff develops draft report	May 15
DATE staff submits final draft report for Department clearance	June 1
DATE staff submits final report for Office of Communications and Outreach for final editing and printing	June 30
DATE staff submits final report to Congress	July 15

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.

This request is in compliance with 5 CFR 1320.9.