

Supporting Statement for Paperwork Reduction Act Submissions Hurricane Education Recovery Awards

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 sections of each statute or regulations mandating or authorizing the collection of information.

The Emergency Supplemental Appropriations Act for Defense, the Global War on Terror and Hurricane Recovery, 2006 (Pub. L. No.109-234) provides \$50 million in awards to institutions of higher education, as defined in section 102 of the HEA, that are located in an area in which a major disaster was declared in accordance with section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act related to hurricanes in the Gulf of Mexico in calendar year 2005, and that were forced to close, relocate or significantly curtail their activities as a result of damage directly caused by the hurricanes. These Hurricane Education Recovery Awards can only be used to defray expenses, including expenses that would have been covered by revenue lost as a direct result of a hurricane, expenses already incurred, and construction expenses directly related to damage resulting from the hurricanes.

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 will be used by the Department staff to allocate \$50 million in appropriated funds among institutions that submit applications for Hurricane Education Recovery Awards.

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 decisions of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The form used for this information collection will be made available for download on the Department's website. Responses, including a certification by the institution, will be faxed back to the Department for processing. Additional information needed by the Department from each institution to determine its award amount will be submitted via grants.gov. Information specific to each registered grants.gov user, including all postsecondary institutions we expect to respond to this information collection, is already resident on the grants.gov

system. Since this information includes institutional identifiers and completed standard forms, use of the grants.gov system reduces respondent burden.

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

The Department is only requesting information that is not available for all potential applicants from another source.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The Department is going to collect the absolute minimum amount of data necessary to equitably allocate funds among all eligible applicants.

6. Describe the consequences to Federal program or policy activities collections is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Without the collection, the Department would have no basis for allocating the \$50 million in funding provided by the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror and Hurricane Recovery, 2006 (Pub. L. No.109-234).

7. Explain any special circumstances that would cause an information to be conducted in a manner:
 - Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

We plan to provide institutions applying for funds under this collection less than 30 days to respond. The information requested is factual in nature, is known by the respondents (according to those with whom we have discussed this collection), and will be used to compute individual institutional award amounts. Institutional respondents will have additional time to describe how they plan to use the funds that they are awarded. If additional time were provided to institutions to respond to the initial data collection, the Department would be unable to award these funds provided prior to September 30. Note: these funds were provided in the 4th emergency supplemental (the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror and Hurricane Recovery, 2006 (Pub. L. No.109-234)) signed into law on June 15, 2006.

8. If applicable, ...
Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and

record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

In developing this collection, the Department consulted with the National Association of College and University Business Officers (NACUBO). In turn, NACUBO consulted with institutions in the Gulf Coast region to ensure that the data being requested is readily available and could be submitted to the Department quickly.

The basic data to be collected was specified by Congress in the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror and Hurricane Recovery, 2006 (Pub. L. No.109-234). Only one data element was added by the Department to ensure that funds are not provided for costs for which the institutions have already been reimbursed.

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

The data being requested will be used to award funds provided under the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror and Hurricane Recovery, 2006 (Pub. L. No.109-234).

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulations, or agency policy.

This information will be on the public record.

11. Provide additional justification for any question of a sensitive nature.

No such questions will be asked.

12. Provide estimates of the hour burden of the collection of information.

The estimate should 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.

We estimate that completing the requested collection will take each of 50 respondents an average of 90 minutes to complete using information already available on-site at the institution. This estimate includes the time it will take to collect data and complete the information form, submit follow-up data via grants.gov, as well as time for the chief executive officer to review and approve the information included in the collection. In the information form, we will have collected all the information necessary to calculate the award. Institutions will have identified all the statutorily eligible activities that they are interested in pursuing. In the follow-up data submitted through grants.gov, we will collect

information on the activities institutions actually elected to pursue from those activities initially identified on the information form along with the corresponding budget. The total hour burden associated with this collection is 90 minutes. The data being requested have already been reported to state and local governments and insurance companies.

The cost burden to respondents and record keepers of this collection is estimated at \$3,400. (See table 1). This estimate assumes that respondents will retain no additional information than would be necessary for their customary and usual business practice.

Table 1

Number of applicants	50		
Hours per applicant	1.5		
	Hours	Hourly rate	Total
Collecting data & completing form	.75	\$40	\$30
Submitting data via grants.gov	.5	\$40	\$20
Review & approval	0.25	\$70	\$18
Total per respondent			\$68
Grand Total			\$3,400

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There is no other cost to respondents.

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), any other expenses that would have been incurred with this collection of information.

The Department will spend approximately \$7,046, including overhead, to make the awards using the information being collected. ED staff will develop the website to provide information and forms for awards under Hurricane Education Recovery Awards. Specifically, ED staff will spend approximately 20 hours collecting the data and recording this information in a spreadsheet. Other ED staff will spend approximately one day (8 hours) developing and testing a formula to allocate funds using the information recorded in the spreadsheet. Finally, ED staff will spend 60 hours this year to generate awards and monitor expenditures using GAPS. (See table 2.)

Existing equipment and systems will be used to receive these data, allocate awards, make awards and monitor expenditures.

Table 2

	Hours	Hourly Cost	Total Cost
Materials development	20	\$50	\$1,000
Receipt & entry of data	20	\$35	\$700
Development of formula & description	8	\$70	\$560
Award generation in GAAPS	20	\$35	\$700
Monitoring expenditures	40	\$35	\$1,400
Web posting	8	\$43	\$344
Total	88	\$53	\$4,704
with overhead			\$7,056

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 on OMB Form 83-I.

This is a one-time new collection.

16. For collections of information whose results will be published, outline plans for tabulations and publications. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and end dates of the collection of information, completion of report, publication dates, and other actions.

ED will publish to the Department's website the awards and the methodology used to calculate the awards that result from this collection prior to September 30, 2006. The projected schedule is provided below.

Enactment of Pub. L. No.109-234	June 15, 2006
Publish PRA Notice	August 9, 2006
Public Comment Period Ends	August 16, 2006
Notice Published in the FR	August 17, 2006

Form available on the Department's website

Information received by the Department September 5, 2006

Estimated awards provided to institutions September 7, 2006

Applications with budget for estimated awards due September 12, 2006

Consultation with institutions, if necessary September 13 – 21, 2006

Awards made September 29, 2006

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.

None.

18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," on OMB Form 83-I.

The Department notes an exception to the certification statement that indicates that:

"It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected."

Since the Department did not anticipate that the Congress would appropriate the funds to be awarded in this manner, we had no opportunity to plan and allocate resources for this collection. The Department has, however, attempted to ensure that within this constraint it will use the information collected to allocate the funds to be awarded in an appropriate and timely manner.