SUPPORTING STATEMENT

Request for OMB Review
Safe and Drug-Free Schools and Communities National Programs
--Federal Activities—
Grant Competition for Safe Schools/Healthy Student

A. Justification

1. **Explain the circumstances that make the collection of information necessary.**

   The Initiative is authorized under Title IV, Part A, Subpart 2, Section 4121 of the Safe and Drug-Free Schools and Communities Act (SDFSCA) authorized by the Improving America's Schools Act of 1994 and other programs related to developing and maintaining safe, disciplined, and drug-free schools. This form requests programmatic and budgetary information needed to evaluate applications based on the authorizing legislation and the program specific selection criteria.

   This collection is a revision of a previously cleared collection (18865-0004). We request that the revised collection be approved for a period of three years. We have proposed several changes to the Safe Schools/Healthy Students initiative (via a Notice of Proposed Priorities (NPP)) that will impact respondent burden and that are reflected in the revised information collection. We believe that some of these changes will decrease respondent burden, others will minimally increase respondent burden, but that overall burden for the revised collection remains unchanged. As a result, we have retained the same per respondent burden estimate for the package as that for the previously cleared package.

   Specifically, we have:

   - simplified requirements for the memorandum of agreement that must be submitted with the application;
   - reduced the number of sub-criteria that applicants are required to respond to; and
   - required applicants to include a logic model (a graphic representation of major elements of their project) as part of their application.

   We modified the previous requirement for applicants to submit two different partner agreements with their application. One of the agreements detailed partner roles and responsibilities; the other described the protocols to be used by schools and the local public mental health authority related to provision of mental health services to students. We propose that applicants now submit a single agreement, identifying the required partners and demonstrating their commitment to the project. We have added a requirement for a final agreement (but only for successful grantees, not all applicants) that will provide more detailed information

about project management and implementation. This second agreement will be negotiated during the first months of the grant. This change is designed to simplify application requirements and reduce burden for applicants, in part by requesting information that had previously been included in the application (for example the mental health protocols) only from grantees, not from applicants.

We also closely examined selection criteria for the initiative, and have made a significant reduction in the number of subcriteria in this revised collection (down from 25 to 15). Specifically, we reviewed the criteria with an eye to eliminating subcriteria that have not been clearly understood by applicants and peer reviewers, as well as those subcriteria that did little to distinguish applications based on their quality. We propose revised criteria (via the NPP) that should assist applicants in crafting project narratives that connect problems, goals/objectives, programming, and evaluation strategies, as well as demonstrating a strong management plan.

We also propose that applicants include a logic model with their application. Many applicants (and grantees) have found it challenging to develop a project narrative that appropriately connects the results of community needs assessment with project goals and objectives, program activities, and evaluation and measurement strategies. Grant sites from the fiscal year 2005 and 2006 cohorts of this initiative have used the logic model tool on a voluntary basis, and both grantees and Federal project officers have found the use of a logic model to be a very valuable organizing tool for implementing and managing SS/HS projects.

Our proposed revisions to this collection have been carefully considered and designed with two goals in mind. First, we have identified a limited number of requirements that we believe are correlated with successful, well-managed SS/HS projects. Second, we have reduced or eliminated requirements and selection criteria that have been problematic for applicants or that have not produced high quality grant applications.

2. **Indicate how, by whom, and for what purpose the information is to be used.**

   The application allows the respondents to apply for Federal assistance. The application describes the need for the program, eligible applicants, the type of programs proposed, the range of services to be provided, and data to collect and report on in accordance with the Government Performance and Results Act (GRPA). Peer reviewers will evaluate information submitted by respondents. ED will make decisions about awarding SS/HS initiative grants based on information submitted in response to this collection.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.**

For the first time under this program, respondents will have the option to submit their applications via Grants.Gov, the government-wide grant application portal. The inclusion of this program as part of the Grants.Gov initiative is consistent with the Department's commitment to offer electronic submission of applications for virtually all of its grant competitions in fiscal year 2007.

4. **Describe any 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 supplied by the applicant is not in any other data collection, and is unique to this program and the particular applicant. The application is a single document intended to serve a specific mandated purpose and is in keeping with statutory requirements.

No information is available from any other source that enables the Department of Education to evaluate the qualifications of the applicants under the program provisions.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This collection of information does not involve small businesses or other small entities.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

If the information is not collected, the Department will not be able to make new awards this year.

7. **Explain any special circumstances.**

This collection is consistent with 5 CFR 1320.5 except for requesting additional copies of the application, which are voluntary and the requirement of two budget narratives. Each applicant is required to submit an original and two copies of their application. Two additional copies are requested to help expedite the peer review process. The additional burden to the applicant is not significant in time or expense, and, if applicants do not provide an additional copy, it will not impact negatively on their application. The time required for the agency to make an additional copy of each of the applications could delay the peer review process and possibly result in not being able to complete the review cycle in time to make the awards before the funds expire

Two budget narratives are required as Safe School/Healthy Students grantees are funded jointly by the Departments of Education and Health and Human Services.

A separate budget is required for each funding agency. Two budgets are required because of provisions in ED's program authority that prohibit certain activities that can be proposed by applicants, such as treatment services. The requirement for two budgets helps program staff make sure that these statutory limitations are met.

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

Since the last grant competition, current grantees and other professionals with a working knowledge of SS/HS have commented on how to improve the SS/HS application, instructions, and requirements in a number of settings, including grantee meetings and trainings. Many of those comments and concerns were taken into consideration as we revised the SS/HS initiative and this correspondent information collection.

We also carefully assessed application requirements and selection criteria that seemed to be problematic for respondents, and have modified this collection (consistent with proposed modifications in requirements via the notice of proposed priorities, application requirements, selection criteria and definitions) to address those concerns.

Additionally, the public will have an opportunity to comment in response to the Paperwork Reduction Act section of the NPP.

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

No payments or gifts will be provided to respondents for this data collection, other than awards made to grant recipients.

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

There is no statutory, regulatory, or policy requirement for assuring confidentiality.

11. **Provide additional justification for any questions of a sensitive nature.**

No sensitive information will be collected.

12. **Provide estimates of the hour burden of the collection of information. Provide estimates of annualized cost to respondents for the hour burdens for**

collections of information, identifying and using appropriate wage rate categories.

The estimated annual number of respondents for the report is 500. Based on our experience and input from respondents, the public reporting burden for this collection of information is estimated to average 26 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The average cost per respondent will be $617.

It is estimated that the annual median salary of professional staff at a local educational agency is $60,000. The annual median salary for a support staff person at the local educational agency is $25,000. Given a 2080-hour work year, the annual cost to <u>each</u> respondent is estimated as follows:

$60,000 x 18/2080 = $520
$25,000 x 8/2080 =   <u>$97</u>
                      $617

The total estimated annual cost to <u>all</u> respondents is:

500 x $617 = $308,500

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

A one-time only response is required for this information collection. Therefore, there are no capital costs or other start-up costs anticipated for respondents.

14. **Provide estimates of annualized cost to the Federal government.**

The following estimates consider costs to the Federal government for reproducing and mailing application packages, and the receipt, screening, review and selection, and negotiation and award of applications.

The annual cost to the Federal government for reproduction and mailing is estimated as follows:

Reproduction: 1,500 applications x $2.00   = $3000.00
Mailing: 1,500 applications x $1.50   = <u>$2250.00</u>
Total Reproduction and Mailing   = $<u>5250.00</u>

The annual cost for the receipt, screening, review and selection, and negotiation and award of applications is estimated at $263,550 based on the following:

Application receipt and screening @ $35.00 per hour x 2 hours per application x 500 applications = $35,000.00

Peer review and analysis @ $450 per application x 475 applications = $213,750.00

Slate preparation, negotiation and award of grants @ $35 per hour x 4 hours per grant x 20 grants = $2,800.00

Notification of unsuccessful applicants @ $25.00 per hour x 1 hour per applicant x 480 unsuccessful applicants = $12,000.00

Total annualized cost to the government = $263,550

15. **Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

We have adjusted the percentage of responses to be collected electronically from zero to 15%. There is no overall change in estimated burden for this collection of 13,000 hours. This will be the first time responses will be collected electronically, and we based the percentage on OSDFS experience with electronic responses via the Grants.Gov portal. The total annual hours requested remain at 26, the current per application OMB inventory. No other adjustments were made to item 13.

In Item 14, we have also adjusted estimated costs for peer review and costs to the government for other functions (such as application screening, slate preparation, and budget negotiations) to more closely reflect current estimated costs for these activities.

16. **For collection of information whose results will be published, outline plans for tabulation and publication.**

There are no plans to publish the results of the information collection.

17. **If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

Approval to not display the expiration date is not being sought.

18. **Explain each exception to the certification statement identified in Item 19, "Certification of Paperwork Reduction Act Submissions," of OMB Form 83-1.**

No exceptions have been identified.

B.   <u>Collections of Information Employing Statistical Methods</u>

The collection of information does not employ statistical methods.