

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 Reading First program awards grants to State educational agencies to improve K-3 reading instruction through the application of scientifically based reading research. Through Reading First, States support the implementation of scientifically based reading programs in targeted local educational agencies and schools through competitive subgrants, and also provide related professional development to K-3 teachers statewide.

The proposed collection is a revision of collection 1810-0666 the annual performance report for the Reading First State Grant program. It is necessary for States to provide the Department with information about their progress in implementing and evaluating their Reading First programs, as required under Section 1202 (d)(5) of the Reading First statute. These data are not duplicative of other data collected from States and are not collected by the Department through EDEN.

Section 1202 of the Elementary and Secondary Education Act describes information to be included in the performance report. This section of the statute is attached.

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 is used by the Department to monitor State progress and performance in the implementation of the Reading First program. As required in the Reading First statute, the information is used to assess technical assistance needs and to determine if significant progress has been made.

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.

A web-based reporting system is utilized to collect this information. All information is collected from all States through this system.

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.

The performance report information is specific to the program requirements of Reading First. The Department has ensured that the report does not duplicate information obtained through other sources, including the national evaluation. The Department will combine information from this data collection and the national evaluation to avoid duplication and keep the overall number of data items to a minimum.

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.

Small entities are not affected by this program. The respondents are State educational agencies.

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.

Section 1202 of the Reading First statute requires that States submit annual performance reports. Without this collection, States will be out of compliance with this provision.

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 would cause this information collection to be conducted in any of the described ways.

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.

Ongoing consultations have been conducted with State educational agency representatives related to this collection. The proposed revisions incorporate their feedback.

The Department published a 60 day Federal Register Notice on June 13, 2006 soliciting comments, but none were received. The Department published a 30-day Federal Register Notice on August 21, 2006.

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

No payments or gifts to respondents have been made.

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

There is no assurance 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 13 of OMB Form 83-I.
- ? 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.

A. Burden Hours for Respondents

There will be 55 respondents to this collection. The average burden for the completing the annual performance report is 18. Thus, the total average burden for this report is 990 hours.

B. Cost to Respondents

$$\begin{aligned} \text{Total Cost to Respondents} &= 55 \text{ reports} \times 18 \text{ hours/application} \times \\ &\$25/\text{hour} = \$24,750 \end{aligned}$$

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)
- ? The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and 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.

There are no costs that (a) meet the criteria for inclusion under this item; and (b) have not been addressed in either item #12 or item #14.

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.

Estimated Federal Costs:

<i>Program Personnel:</i>		
<i>1 person @\$40.00/hr x 110 hours</i>	<i>=</i>	<i>\$ 4,400</i>
<i>1 person @\$23.00/hr x 110 hours</i>	<i>=</i>	<i>2,530</i>
<i>1 person @ \$19.00/hr x 20 hours</i>	<i>=</i>	<i><u>380</u></i>
<i>Total</i>		<i>\$7,310</i>

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

This is a renewal. Several changes have been made to the original performance report. No additional questions have been added, but several have been removed, thus lowering the overall burden hours for this collection. Questions related to special education referral rate and program expenditures have been removed. The specific changes and the reasons for them are discussed in detail in the attached memo.

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.

There are no plans to publish the results of this data 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.

The OMB expiration date will be displayed.

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

There are no exceptions to the referenced certification statement.

B. Collection of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on Form 83-I is checked "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed.

This information collection does not employ statistical methods.