

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION  
EDGAR Recordkeeping and Reporting Requirements**

**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 Education Department General Administrative Regulations (EDGAR) Recordkeeping and Reporting Requirements are currently part of another collection, OMB Control number 1890-0004. The 1890-0004 collection currently includes three distinct information collection instruments, the ED 524 Budget Form, the ED 524B Grant Performance Report and the recordkeeping and reporting requirements that carry burden in EDGAR. The 1890-0004 collection expires on 10-31-2007. As part of the renewal of these instruments, we are requesting that each of the instruments be approved under separate OMB Control numbers. Separating these instruments into three information collections will make it easier to make additions deletions, revisions or other needed changes to each instrument throughout the approval period and eliminate any potential confusion when changes are made to only one of the instruments. We are requesting a new OMB Control number for the EDGAR Recordkeeping and Reporting Requirements and a three year approval for this collection. Please note that the ED 524B, Grant Performance Report will retain the 1890-0004 number.

The Education Department General Administrative Regulations (EDGAR) contain several requirements that grantees maintain certain types of records related to their grants and to report or submit certain information to the Department. The specific EDGAR recordkeeping and reporting requirements that are part of this information collection package are described in Table I (attached). These requirements are necessary for the effective administration and monitoring of grant projects.

**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.**

See description of each ED recordkeeping and reporting requirement in attached Table I.

## **EDGAR Recordkeeping and Reporting Requirements**

**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.**

The e-Administration Module of the U.S. Department of Education, url: <http://www.e-grants.ed.gov> gives Project Directors the ability to submit administrative changes to their grant awards. The following types of changes are available: DUNS/SSN, address, key personnel, Project Director name and address, dates (no-cost time extensions), certifying representative, and others. The submission of the aforementioned administrative requests prompts e-mail notification to the ED Program Manager of the administrative request. The creation and printing and signing of a Grant Award Notification (GAN) and subsequent mailing of copies of the GAN signify approval of the administrative request. Note that, G-5, the new Grants Management Back Office System currently being built by ED will continue to allow grantees to submit administrative requests electronically and will also have additional grants management, monitoring and administrative capabilities.

**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 information that the grantees must maintain or submit to the Department under the EDGAR recordkeeping and reporting requirements included in Table I are unique to each individual grant project and cannot be obtained from any other sources. This information would not have been submitted to the Department previously for any other purpose.

**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.**

Under EDGAR regulations, all requirements for small entities are minimized.

**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.**

If this information collection is not conducted or conducted less frequently, it would hinder the ability of ED Program Staff to effectively monitor, provide guidance and technical assistance to grantees. The goal of monitoring is to establish partnerships

## **EDGAR Recordkeeping and Reporting Requirements**

with grantees that allow for flexibility in local decision-making, in conjunction with a results-oriented approach to program management that demonstrates excellence, accountability, and successful performance outcomes. Monitoring must also address ED's fiduciary responsibility to ensure the grantee's legal and fiscal compliance and to protect against fraud, waste, and abuse.

**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.**

The information will not be collected in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

**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**

## **EDGAR Recordkeeping and Reporting Requirements**

**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.**

We will publish both 60 and 30-day Federal Register notices inviting public comment.

Opportunity for comment is also given through annual national conferences, regional and state meetings, frequent monitoring contacts with applicants/grantees (i.e., State Education Agencies (SEA's), Local Education Agencies (LEA's), Tribal Governments, Institutions of Higher Education (IHE's) and Non-Profit Organizations [NPO's] ), which are the entities affected by the information collection. Individuals have expressed their views on the availability of data, frequency of collection, the clarity of instructions and disclosure of reporting format, and on the data elements to be disclosed or reported. These consultations have been effective in resolving any major problems related to the information collection.

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

There are no payments or gifts to respondents other than the allocation of federal funds that result from the information collection.

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

ED is not requesting any confidential information in this collection; therefore no assurances of confidentiality are required.

## **EDGAR Recordkeeping and Reporting Requirements**

**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.**

This information collection does not include information 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.**

Approximately 7835 respondents will be required to maintain records or submit reports in accordance with the recordkeeping and reporting requirements contained in the Education Department General Administrative Regulations (EDGAR). See the attached table for the burden hour calculation for each EDGAR recordkeeping and reporting requirement.

**Total Annual Burden Hours to Respondents for the EDGAR Recordkeeping and Reporting Requirements = 33,395 burden hours (see detailed breakdown in attached Table 1)**

Total # of Responses: 7835

Total Recordkeeping burden hours: 28,400

Total Reporting burden hours: 4,995

## EDGAR Recordkeeping and Reporting Requirements

### Total Annual Cost Burden to Respondents for the EDGAR Recordkeeping and Reporting Requirements

33,395 total burden hours (recordkeeping and reporting) X \$25/hour = \$834,875

**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.

Total Annualized Capital/Startup Cost : \$ .00

Total Annual Costs (O&M) : .00

Total Annualized Costs Requested : \$ .00

## **EDGAR Recordkeeping and Reporting Requirements**

No start-up costs.

**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.**

**Total Annual Cost to the Federal Government for EDGAR Reporting Requirements: \$159,840**

The total annual cost is based on the following:

EDGAR Reporting Requirements: 1 hour per response X 4995 responses X \$32/hour (GS-12 hourly rate) = \$159,840

*Note: There are no costs to the Government associated with the EDGAR Recordkeeping Requirements as no documentation is being submitted to ED for review or action.*

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

Although this is a new information collection package, the EDGAR recordkeeping and reporting requirement is not a new information collection instrument. The EDGAR recordkeeping and reporting requirements were previously part of the 1890-0004 collection. There are no start-up costs.

The burden hours for the remaining EDGAR recordkeeping and reporting requirements have increased overall to reflect the actual number of time extensions notifications received by ED in FY 2006 (which was greater than the number estimated in FY 2003). Please note, however, that in general the burden hour calculations for the rest of the EDGAR recordkeeping and reporting requirements have decreased due to a decreased number of respondents (which is based on FY 2006 grantee data).

**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.**

## **EDGAR Recordkeeping and Reporting Requirements**

No plans exist to publish the results of this 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.**

We are not seeking approval to not display the expiration date for this information collection.

**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 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:

- 1. Describe the potential respondent universe (including a numerical estimate) and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, state and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**
  
- 2. Describe the procedures for the collection of information, including:**
  - Statistical methodology for stratification and sample selection.**
  
  - Estimation procedure.**
  
  - Degree of accuracy needed for the purpose described in the justification.**
  
  - Unusual problems requiring specialized sampling procedures, and**



## **EDGAR Recordkeeping and Reporting Requirements**

- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.
1. Describe methods to maximize response and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.
  2. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.
  3. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other persons who will actually collect and/or analyze the information for the agency.

The results of this information collection will not be published for statistical purposes.