Office of Innovation and Improvement - DC School Choice Incentive Consolidated Appropriations Act 3 2004 Public Law P.L. 108-199, 188

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT

A. Justification

1. Circumstances that make the collection of information necessary

The DC School Choice Incentive Program, authorized by the Consolidated Appropriations Act of 2004, awarded a grant to the Washington Scholarship Fund that will administer scholarships to students who reside in the District of Columbia and come from households whose incomes do not exceed 185% of the poverty line. Priority is given to students who are currently attending schools in need of improvement, as defined by Title I. To assist in the student selection and assignment process, the information to be collected will be used to determine the eligibility of those students who are interested in the available scholarships. Also, since the authorizing statute requires an evaluation we are proposing to collect certain family demographic information because they are important predictors of school success. Finally, we are asking to collect information about parental participation and satisfaction because these are key topics that the statute requires the evaluation to address.

2. Purpose for Use of the Information

The collection will be used to collect basic information about applicants for DC School Choice Incentive scholarships and preliminary information for the evaluation. Failure to collect this information will hinder the grantee's ability to select students for the scholarships, administer the student lottery, identify the number of slots available in participating schools, to effectively manage the distribution of scholarships to low-income parents of students, and to meet certain evaluation and reporting requirements, as required by the statute. In turn, this will negatively impact the entire program by risking fair and equitable access to the expanded educational options for low-income parents in the District of Columbia.

3. Extent for Use of Technological Collection Techniques

Since responses will be submitted in hard copy, the collection of information does not involve the use of automated, electronic, or mechanical forms of information technology.

4. Efforts to Identify Duplication

We have made the determination that a duplication of effort does not exist, since the respondents are unique to this narrowly tailored grant program. To the best of our knowledge, there is no other information collection that is available to fulfill this request.

5. Impact of Collection of Information on Small Businesses or Other Small Entities

There is no anticipated impact on small business or other small entities (as stated in Item 5 of OMB For 83-1).

6. Consequences to Federal program or Policy Activities

The statute requires that the grantee conduct an extensive public education campaign, in which parents' apply for scholarships, and that the grantee identifies participating schools, administers a student lottery, and, conducts the student selection and assignment process. Additionally, the grantee will participate in evaluating programmatic activities. The negative consequences of not performing the information collection requested could be detrimental to the notification to parents about the expanded options, filling the available slots in participating schools, distribution of student scholarships, and overall nullify the management, evaluation and administration of the grant program.

7. Special Circumstances

There are no special circumstances.

8. Description of Efforts to Consult with Persons Outside the Agency

As a part of the collaboration and responsibilities outlined in the Memorandum of Understanding between the Secretary of Education and the Mayor of the District of Columbia, we have coordinated and obtained our collective views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting formats and the data elements.

We published the required 30-day federal register notice requesting public comment.

9. Explanation to Provide Payments or Gifts to Respondents

There is no payment or gift to respondents, other than remuneration of contractors or grantees (upon the completion of the grant competition and award of the contract for the evaluation of the program).

10. Description of Assurance of Confidentiality

Based upon the assurance in statute, regulation, or agency policy for discretionary grant programs, the Department's disclosure polices adheres to the provisions under the Privacy Act. Although interested scholarship applicants will submit their application forms to the Washington Scholarship Fund, Westat, the contractor that will conduct the lottery will maintain the information for this collection. The contractor has established policies and procedures in place to manage all ED-related procurements.

Families and children in the scholarship program will be assured that their responses are confidential and that individually identifiable data will not be disclosed in any public file or report. To ensure confidentiality of information, program participants, both treatment and controls, will be assigned identification numbers that will be used for the study. A key component of the database design and analysis will be to create unique and non-meaningful IDs. In addition, to allow longitudinal tracking and analysis, we propose to add the school year to the record key, so the index to a student record will be the composite of Student ID and School Year. In the processing and reporting phases, identification numbers will be used in lieu of individual's names or addresses. Westat separately stores identifiable family and student information, including, but not limited to, the student's name, address, phone number, DCPS student ID, social security number, and the study's student key, so we can maintain links in our data to DCPS data while preserving subject confidentiality.

All Westat employees sign an assurance of confidentiality. It provides assurance to ED that any individuals with responsibility for collecting or coding raw data will be trained in confidentiality issues and will have signed such assurances before handling any confidential data.

Westat applies ED's Information Quality Guidelines routinely on their studies, particularly those guidelines that define the secure and confidential handling of data and ensuring quality of data collected. Recently, they have successfully completed a Security Assessment, which, by reference, includes full compliance with ED's Information Quality Guidelines for the Data Analysis System (DANS) for ED's Office of Special Education Programs (OSEP).

On the proposed application form, the following information will be included: The information you provide will be maintained by Westat and shared only with the organization that is selected by the grantee to verify income information and with the organization selected by the U.S. Department of Education to conduct the evaluation of this program. Any information you provide herein will not be shared with any other third party not affiliated with the grantee or contractor organization.

11. Additional Justification for Any Questions of a Sensitive Nature

The information collection does not include questions of a sensitive nature such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Estimation of the Hour Burden

Collection	Number of Respondent s				Total
Informatio n	3,000	1	3,000	.20 (20 min)	1,000

The annual number of responses for this collection total 3,000. The average number of hours/responses is 30 minutes, which results in a total of 1,000 annual burden hours.

13. Cost Burden to Respondents or Record Keepers

There are no start-up costs for this collection.	
Total Annualized Capital/Startup Cost:	
Total Annual Costs (O&M) :	
Total Annualized Costs Requested:	<u>0</u>

The costs are minimal, because the program will be administered by the grantee.

14. Estimates of Annualized Cost to the Federal Government

Work Estimate	Number of Employees	Pay Rate	Cost per Hour	Average # of Hours	Total
Analysis and processing	1	GS-13	\$41.00	10	\$410. 00

15. Reasons For Changes in Burden

There is no change in burden.

16. Publication of Results Of Collection of Information

The results of the information collection will not be published.

17. Approval to Not Display Expiration Date

We are not seeking this approval.

18. Exception to the Certification Statement

We are not requesting any exceptions to the "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-1.

B. Collection of Information Employing Statistical Methods

Statistical methods will not be used to reduce burden or improve accuracy of results.