

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.

Section 4121 of the No Child Left Behind Act of 2001 (see attached) authorizes funds for drug abuse and violence prevention programs for students enrolled in institutions of higher education. This form requests programmatic and budgetary information needed to evaluate applications based on the authorizing legislation and selection criteria identified in the notice of proposed priority, definitions, requirements, and selection criteria (see also attached). The attached application package, which uses program-specific selection criteria, is a revised version of the previously used generic application.

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 application allows respondents to apply for federal assistance. The application package describes the need for the program, the type of projects to be funded, the range of services to be provided, and any accomplishments and achievements expected from the program.

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 information collection allows applicants the option to submit their applications electronically via Grants.gov.

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 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 purpose and is consistent with statutory requirements. No information is available from any other source to enable ED to evaluate the applicants' qualifications under the program provisions.

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.

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

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 the information is not collected, ED will not be able to recognize and provide funding to exemplary, effective, and promising alcohol or other drug abuse prevention programs on college campuses in FY 2008.

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.

This collection is consistent with 5 CFR 1320.5 except for requesting an additional copy of their application, which is voluntary. Each applicant is required to submit an original and two copies of their application, and a third copy is requested. Applications submitted in FY 2007 averaged 50 pages, including appendices. The additional burden to the applicant is not significant in time or expense, and, if an applicant does not provide an additional copy of its application, it will not negatively affect its application. The time required for ED or its contractor to make an additional copy of each of the applications could delay the peer review process.

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.

Staff from the Office of Safe and Drug-Free Schools meets with campus-based prevention practitioners several times a year through regular

meetings of the Network Addressing Collegiate Alcohol and Other Drug Issues Executive Committee and Regional Directors and the Review Group for ED's Higher Education Center for Alcohol and Other Drug Abuse and Violence Prevention. OSDFS staff also presents a workshop on ED's discretionary grants process at its annual National Meeting on Alcohol and Other Drug Abuse and Violence Prevention in Higher Education. Lastly, in FY 2008, staff from OSDFS and its Higher Education Center will present information about this program at five national meetings to present information on the core elements or effective alcohol and other drug abuse prevention programs on college campuses, how to implement the core elements, and ED's discretionary grants process.

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

No sensitive information will be collected.

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.

The estimated number of respondents to this information collection is 50. Based on our experience and input from respondents, the public reporting burden for this collection of information is estimated to average 32 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and reviewing and completing the collection of information. The average cost per respondent will be \$656.

It is estimated that the annual median salary for a program administrator at an institution of higher education is \$55,000. The annual median salary for a support staff person at an institution of higher education is \$22,000. Given a 2,080-hour work year, the annual cost to each respondent is estimated as follows:

$$\begin{aligned} \$55,000 \times 20/2080 &= \$529 \\ \$22,000 \times 12/2080 &= \underline{\$127} \\ & \$656 \end{aligned}$$

The total estimated annual cost to all respondents is:

$$50 \times \$656 = \$32,800$$

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 capital costs or other start-up costs anticipated for 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), 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.

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

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

Reproduction: 300 applications x .35	= \$105
Mailing: 100 applications x 1.22	= <u>\$122</u>
Total	= \$227

The annual cost for the receipt and screening of applications, and review, selection, and award of grants is estimated as follows:

Application receipt and screening: $\$24/\text{hour} \times .5 \text{ hour per application} \times 50 \text{ applications} = \600

Peer review and analysis: $\$1,000 \text{ per reviewer} \times 20 \text{ reviewers} = \$20,000$

Site visits: $\$2,000 \text{ per site visit} \times 10 \text{ sites} = \$20,000$

Slate preparation and award of grant: $\$30/\text{hour} \times 2 \text{ hours per grant} \times 5 \text{ grants} = \300

Notification to unsuccessful applicants: $\$12/\text{hour} \times .5 \text{ hour per applicant} \times 45 \text{ unsuccessful applicants} = \270

Total annualized cost to the government = $\$41,397$

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

As this is a new collection, all burden is considered new.

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 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 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

No exceptions have been identified.

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.

This collection of information does not employ statistical methods.

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
 - ? 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.