Supporting Statement for Paperwork Reduction Act Submission

2009 Higher Education Disaster Relief (HEDR)

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 Consolidated Security Disaster Assistance, and Continuing Appropriations Act, 2009 (Public Law 110-329) provides $15 million in awards to institutions of higher education (as defined in section 101 or section 102(c) of the Higher Education Act of 1965) that are located in an area affected by hurricanes, floods, and other natural disasters occurring during 2008 for which the President declared a major disaster under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974. The funds are to be used to:

- Help defray expenses (which may include lost revenue, reimbursement for expenses already incurred, and construction) incurred by institutions that were forced to close, relocate, or whose operations were impaired as a result of damage directly caused by such hurricanes, floods, and other natural disasters occurring during 2008, and
- For payments to enable such institutions to provide grants to students in attendance at the institutions for academic years beginning on or after July 1, 2008.

Emergency clearance of the Pre-Application Information Form for the Higher Education Disaster Relief program is needed since Congress expects awards to be made within 60 days of the enactment of Public Law 110-329. The law was enacted September 30, 2008.

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 will be used by Department staff to allocate $15 million in appropriated funds among institutions that submit applications for Higher Education Disaster Relief awards.

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 Department will publish a separate closing date notice in the *Federal Register* announcing the application for the Higher Education Disaster Relief program. The Pre-Application Information Form used for this information collection will be made available for download on the Department's Web site. Responses will be e-mailed to a special Department mailbox (HEDR@ed.gov) for processing. Institutional allotments from the

$15 appropriation will be based on these responses. Once notified of their allotments, applicants will submit additional information through Grants.gov using already approved standard forms. Information specific to each registered Grants.gov user, including all postsecondary institutions, is already available in the Grants.gov system. Since this information includes institutional identifiers, use of the Grants.gov system reduces respondent burden.

The projected schedule for the Higher Education Disaster Relief program is provided below.

Enactment of Public Law 110-329	September 30, 2008
Form to OMB for emergency clearance	October 29, 2008
Form approved by OMB	November 6, 2008
Closing date notice published in the *Federal Register* and form available on the Department's Web site	December 1, 2008
Pre-application information received by the Department	December 12, 2008
Institutions notified of estimated awards	December 17, 2008
Applications for estimated awards due, including detailed budget and activity plan	January 12, 2009
Consultation with institutions, if necessary	January 13-15, 2009
Funds awarded	February 2, 2009

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 Department is only requesting applicant information that is not available from another source.

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.

Eligible applicants are institutions of higher education. The collection of this information is not expected to impact small businesses or other small entities. The Department intends to collect the absolute minimum amount of data necessary to equitably allocate funds among eligible applicants.

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.

Without the collection, the Department would have no objective means of allocating the $15 million in funding provided by the Consolidated Security Disaster Assistance, and Continuing Appropriations Act, 2009 (Public Law 110-329).

7. Explain any special circumstance that would cause an information collection to be conducted in a manner:

- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**

We plan to provide institutions applying for funds under this collection less than 30 days to respond. The information requested is factual in nature, is known by the respondents (according to those with whom we have discussed similar collections in the past), and will be used to compute individual institutional allotments. Institutional respondents will have additional time to describe how they plan to use the funds they are allotted. If additional time were provided to institutions to respond to the initial data collection, the Department would be unable to award the funds expeditiously, as expected by Congress and needed by the affected institutions.

Note: These funds were provided in the Consolidated Security Disaster Assistance, and Continuing Appropriations Act, 2009 (Public Law 110-329) signed into law on September 30, 2008 with the expectation that awards would be made within 60 days of the law's enactment.

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.

We are publishing the appropriate emergency *Federal Register* notice.

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.

The data to be collected are identical to those used to make disaster relief awards in FY 2007 for the Hurricane Education Recovery Awards program, which was authorized in the Emergency Supplemental Appropriations and Additional Supplemental Appropriations for Agricultural and Other Emergency Assistance for the Fiscal Year Ending September 30, 2007, and for Other Purposes (Public Law 110-28).

The Hurricane Education Recovery Awards program was conducted twice – in FY 2006 and FY 2007. In developing the information collection instrument for that program, the Department consulted with the National Association of College and University Business Officers (NACUBO). In turn, NACUBO consulted with institutions in the Gulf Coast region to ensure that the data being requested was readily available and could be submitted to the Department quickly. The Department proposes to collect exactly the same data for the Higher Education Disaster Relief program. We believe the requested information continues to be readily available and can be submitted to the Department quickly.

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

The data being requested will be used to award funds provided under the Consolidated Security Disaster Assistance, and Continuing Appropriations Act, 2009 (Public Law 110-329).

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

There is no assurance of confidentiality provided. This information will be on the public record.

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. This 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 such questions will be asked.

12. Provide estimates of the hour burden of the collection of information. Generally, estimates should not include burden hours for customary and usual business practices.

Based on prior experience, we estimate that completing the requested collection will take each of 50 respondents an average of 90 minutes using information already available at the institution. This estimate includes the time it will take to collect data and complete the Pre-Application Information Form, submit follow-up data via Grants.gov, as well as time for the chief executive officer to review and approve the information included in the collection.

In the Pre-Application Information Form, we will collect information necessary to calculate the award. Institutions will have identified all the statutorily eligible activities they are interested in pursuing. In the follow-up data submitted through Grants.gov, we will collect information on the activities institutions actually propose to pursue from those activities initially identified on the Pre-Application Information Form, and we will collect budget information corresponding to the proposed activities. The total hour burden associated with this collection is 75 hours. The data being requested have already been reported to state and local governments and insurance companies.

The cost burden to respondents and record keepers of this collection is estimated at $3,400. (See Table 1.) This estimate assumes that respondents will require no information other than that necessary for their customary and usual business practice.

Table 1

	Hours	Hourly Rate	Total Per Respondent
Number of applicants	50		
Hours per applicant	1.5		
Collecting data and completing form	0.75	$40	$30
Submitting data via Grants.gov	0.5	$40	$20
Review and approval	0.25	$70	$18
Total per respondent			$68
Grand total for 50 respondents	75		$3,400

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.)

There is no other cost to 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 Department will spend approximately $9,606, including overhead, to make the awards using the information being collected. ED staff will develop the Web site to provide information and forms for awards the Higher Education Disaster Relief program (8 hours). ED staff will spend approximately 40 hours developing materials for the program, collecting institutional data, and recording the collected data in a spreadsheet. Other ED staff will spend approximately one day (8 hours) developing the formula and allocating funds using the information recorded in the spreadsheet. Finally, ED staff will spend 60 hours to generate awards and monitor expenditures using GAPS. (See Table 2.)

Existing equipment and systems will be used to receive these data, allocate awards, make awards and monitor expenditures.

________Table 2

	Hours	Hourly Cost	Total Cost
Web posting	8	$43	$344
Materials development	20	$55	$1,100
Receipt/entry of data	20	$55	$1,100
Development of formula and fund allocation	8	$70	$560
Award generation in GAPS	20	$55	$1,100
Expenditure monitoring	40	$55	$2,200
Total			$6,404
With overhead			$9,606

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 new collection.

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.

Not applicable. No statistical data will be analyzed or published.

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.

The Department notes one exception to the Certification for Paperwork Reduction Act Submissions, which is this statement regarding the collection:

“It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected.”

Since the Department did not anticipate that Congress would appropriate funds for disaster relief awards as provided in Public Law 110-329, we had no opportunity to plan and allocate resources for this collection. The Department has, however, attempted to ensure that within this constraint it will use the information collected to allocate the funds to be awarded in an appropriate and timely manner.