

Supporting Statement for Survey on Ensuring Equal Opportunity for Applicants 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.

This collection is necessary to determine the impact of Executive Orders 13198¹ and 13199² dated January 29, 2001 (the “Executive Orders”). These Executive Orders require the removal of barriers to the full participation of faith-based and community organizations in Federal social service programs. Three additional Executive Orders 13279³, 13280⁴ and 13342⁵ have been issued since then. This collection will continue to provide information to determine the level of faith-based and community participation in the grant programs of the U.S. Department of Education (ED), the Department of Health and Human Services (HHS), the Department of Labor (DOL), the Department of Justice (DOJ), the Department of Housing and Urban Development (HUD), the U.S. Department of Agriculture (USDA), the U.S. Agency for International Development (USAID), the Department of Commerce (DOC) and the Department of Veteran Affairs (VA) and to measure the success of efforts undertaken to comply with these Executive Orders. The information from the collection will be kept strictly separate from the data provided to grant competition decision-makers.

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.

¹ [Executive Order 13199](#) created the White House Office of Faith-Based & Community Initiatives on January 29, 2001.

² [Executive Order 13198](#) created five Centers for Faith-Based & Community Initiatives on January 29, 2001.

³ [Executive Order 13279](#) requires equal protection for faith-based and community organizations as of December 12, 2002.

⁴ [Executive Order 13280](#) created two Centers for Faith-Based and Community Initiatives on December 12, 2002.

⁵ [Executive Order 13342](#) created three new Centers for Faith-Based & Community Initiatives at the Departments of Commerce and Veterans Affairs and the Small Business Administration on June 1, 2004.

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The information received from the current collection was used to measure the level of participation of faith-based and community organizations in Federal grant making programs and to report on the implementation and success of the Faith-Based and Community Initiatives. ED understands that the other agencies (HHS, HUD, DOC, DOL, DOJ, USAID, USDA, and VA) will use this survey form to collect information in a similar manner and that there will be minimal tailoring of this form for use by other agencies.

The information collection is used only for the purpose of ensuring equal opportunity for faith-based and community organizations. In an effort to ensure fairness in the application review and selection process, the following procedures will be followed. An applicant submitting a hard copy application will be instructed to submit the completed survey in a sealed envelope labeled "Applicant Survey" and include it along with the application package. An applicant applying electronically will be instructed to submit the completed survey along with the application. In either case, the information from the collection will not be included in the Federal grants database or available to the grant competition decision makers.

The EEO survey was identified as a potential candidate for adoption as a government-wide form under grants.gov in 2007. The Grants.gov forms workgroup is undertaking a review of forms during calendar year 2009. The EEO form will be part of this general review. It will be some months before the workgroup considers the forms and related issues. Grants.gov is not in a position to absorb the EEO form as a government-wide form before the collection expires in 2009. At this time ED will renew the EEO form as an agency-specific form.

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.

Applicants have the option of submitting the information along with their applications electronically. In 2008, seventy-seven percent (77%) of respondents submitted the survey form electronically resulting in a slight increase of surveys submitted. The option of electronic submission may improve the response rate but not significantly reduce the burden, since submittal of the survey form is voluntary.

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.

This is a request to extend an information collection that was part of a new initiative when it began in January 2001. This information did not exist and had not been collected

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previously. None of the Department's other information collection instruments focus specifically on this market segment of the grant applicant community.

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.

The information collection does not involve small businesses. For small entities, drafting the questions in plain English minimized the burden.

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.

The information collection occurs when an entity applies for a grant. The consequence of collecting the information any less frequently would skew the data and render it less useful.

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.

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This information collection complies with 5 CFR 1320.5. No special circumstances are involved in this information collection.

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.

Experts in this field have been consulted during the original development of the information collection instrument and during each renewal of the collection instrument. Public comment was sought through the publication of a 60-day notice in the Federal Register. Such consultation yielded a consensus that the instrument required readily accessible information and was written in an easy to understand format. No changes were made to the instrument as a result of public comment.

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

No payments or gifts are provided to respondents.

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

The collection instrument informs respondents that the information will be used only for the purposes of equal opportunity for all grant applicants and will not be disclosed or made available to grant-making decision makers.

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

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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.

The collection instrument does not contain any 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.

Respondents' burden hour estimates were based on consultation with the ED Faith- Based Office and other agencies using the information collection instrument.

Table 1 – Total Respondents' Burden in 2008

Type of Grant	Number of Respondents	Frequency of Responses	Hours per⁶ Response	Annual Burden Hours
Discretionary	15,910	1	.08	1,273
Formula	1,530	1	.08	122
Fellowships	1,360	1	.08	109
Total Annual Burden Hour	18,800			1,504

⁶ The hours per response is estimated to be .08 of an hour.

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Table 2- Respondent's Annualized Cost in 2008

Respondent's Hourly Wage	Hours Per Response	Cost to Respondent per Response
\$33.43 ⁷	.08	\$2.67

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.

⁷⁷ The hourly rate of \$33.43 is based on the 2008, General Schedule Locality Pay (DC/Baltimore) of a full time GS 12, Step 1.

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Total Annualized Capital/Startup Cost : \$.00
 Total Annual Costs (O&M) : \$.00

Total Annualized Costs Requested : \$.00

Respondents will incur no start-up, maintenance, and purchase of services 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.

Table 3A – Survey Printing Cost

Number of Surveys	Cost per Survey	Total Cost
20,000	.06	\$1,200

Table 3B– Survey Processing Cost

Number of Surveys	Cost per Survey ⁸	Total Cost
18,800	.628	\$11,806

Table 3C – Survey Data Entry Cost

Number of Surveys	Cost per Survey ⁹	Total Cost
18,800	.942	\$17,709

Table 3D – Survey Total Annualized Cost

Category	Cost
3A. Printing	\$1,200
3B. Processing	\$11,806
3C. Data Entry	\$17,709

⁸ The per unit cost is based on the 2008 hourly rate of a full time GS 7, Step 1 (DC/Baltimore/No VA locality pay) \$18.85. It is estimated to take approximately two (2) minutes to process each survey.

⁹ The per unit cost is based on the 2008 hourly rate of a full time GS 7, Step 1 (DC/Baltimore/NoVA locality pay) \$18.85. It is estimated to take approximately three (3) minutes per survey to enter the data.

The per unit rate is the hourly rate of \$18.85 divided by the number of minutes in an hour (60). To determine the per unit cost, multiply the per minute rate by the number of minutes it will take to enter the information for one respondent

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Total	\$30,715
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15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The total number of respondents submitting the EEO form has increased overall thereby increasing the total burden hours. Although the estimated burden hours will increase by 132 hours, we believe that the increased number of respondents will also include additional community-based or faith-based applicants and that information from these applicants will enable government agencies to better measure the success of their efforts to comply with the Executive Orders and remove barriers to the full participation of these organizations in federal grant programs.

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.

At this time, there are no plans to publish information collected for statistical use.

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.

ED is not seeking approval for omission of expiration date.

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.

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

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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.

The respondent universe will consist of all eligible applicants for certain discretionary, formula and fellowship grant competitions from ED and eight other Federal agencies identified in the response to question 2 in section A above. No sampling will be undertaken. The actual response rate achieved during the collection in 2008 was 18,803 respondents.

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

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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.

No sampling or testing will be involved in this data collection.