
Early Reading First: Grant Performance Report

Office of
Management and
Budget: Clearance
Package, Supporting
Statement and Data
Collection
Instrument

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Supporting Statement for Paperwork Reduction Submission
Early Reading First Performance Report
U.S. Department of Education

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

Each Early Reading First grantee is required to forward an annual performance report or final report to the Secretary describing the annual progress made towards the project's goals. The Elementary and Secondary Education Act (ESEA) of 1965, as amended, Title I, Part B, Subpart 2 Early Reading First (ERF), section 1225 states that

“Each eligible applicant receiving a grant under this subpart shall report annually to the Secretary regarding the eligible applicant's progress in addressing the purposes of this subpart. Such report shall include, at a minimum, a description of —(1) the research-based instruction, materials, and activities being used in the programs funded under the grant;(2) the types of programs funded under the grant and the ages of children served by such programs;(3) the qualifications of the program staff who provide early literacy instruction under such programs and the type of ongoing professional development provided to such staff; and(4) the results of the evaluation described in section 1222(b)(9).”

In addition, section § 74.51 of Education Department General Administrative Regulations (EDGAR) states that,

“ (a) Recipients are responsible for managing and monitoring each project, program, subaward, function, or activity supported by the award. Recipients shall monitor subawards to ensure subrecipients have met the audit requirements in §74.26.

(b) The Secretary prescribes the frequency with which the performance reports shall be submitted. Except as provided in §74.51(f), performance reports are not required more frequently than quarterly or, less frequently than annually. Annual reports are due 90 calendar days after the grant year; quarterly or semi-annual reports are due 30 days after the reporting period. The Secretary may require annual reports before the anniversary dates of multiple year awards in lieu of these requirements. The final performance reports are due 90 calendar days after the expiration or termination of the award.

(c) If inappropriate, a final technical or performance report is not required after completion of the project.

(d) When required, performance reports must generally contain, for each award, brief information on each of the following: (1) A comparison of actual accomplishments with the goals and objectives established for the period, the findings of the investigator, or both. Whenever appropriate and the output of programs or projects can be readily quantified, this quantitative data should be related to cost data for computation of unit costs.(2) Reasons why established goals were not met, if appropriate.(3) Other pertinent information including, when appropriate, analysis, and explanation of cost overruns or high unit costs.

(e) Recipients are not required to submit more than the original and two copies of performance reports.

(f) Recipients shall immediately notify the Secretary of developments that have a significant impact on the award-supported activities. Also, notification must be given in the case of problems, delays, or adverse conditions which materially impair the ability to meet the objectives of the award. This notification must include a statement of the action taken or contemplated, and any assistance needed to resolve the situation.

(g) The Secretary may make site visits, as needed.

(h) The Secretary complies with the clearance requirements of 5 CFR part 1320 when requesting performance data from recipients.”

Currently, ERF grantees use the generic Department of Education (ED) performance reporting form, ED 524B. The current form requires funded projects to forward: (1) a narrative describing the project’s progress towards project goals; (2) a two page executive summary; and (3) actual performance data demonstrating progress towards meeting or exceeding established targets. Unfortunately, the generic, OMB-approved 524B fails to allow grantees to adequately report on the Government Performance and Results Act (GPRA) measures established for the ERF program or the results of any evaluation activities conducted over the year. GPRA requires each agency and program to set targets for its performance; measure progress toward those targets; report on whether or not the targets have been met; and describe future strategies for continued striving toward those targets. This process is designed to improve program management, and to help Congress, the Department of Education, the Office of Management and Budget, and others review a program's progress toward its goals.

Therefore, the Department has revised the current annual reporting form to meet the needs of ERF grantees. The revision allows grantees to report on researched-based activities, project performance measures, GPRA performance measures, and forward the results of any third-party evaluations. By structuring the grantee performance report so that all ERF grantees are able to provide standardized data, the Department will be better able to examine outcomes across projects and effectively monitor the program.

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.

This information will be collected annually from approximately 135 ERF grantees. The ERF statute requires all funded projects to report annually to the Department documenting project’s progress towards accomplishing its goals and objectives. Additionally, the Department will be better able to examine outcomes across funded projects. See Appendix D for a copy of the proposed data collection instrument.

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 respondents have the option of filling out a Microsoft Word document electronically and can return this form via email or printed out in hard copy and mailed to ED. An electronic document reduces costs of printing and makes the process of data collection more efficient.

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.

There are no other sources collecting the same data. Once approved, the revised performance report will be the sole source of information collection for the ERF program. The document serves to streamline the data collection process by creating a single form for all entities.

5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.

This collection of information does not impact small businesses. Under EDGAR regulations, 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.

The Elementary and Secondary Education Act (ESEA) of 1965, as amended, Title I, Part B, Subpart 2 Early Reading First (ERF), section 1225 requires all funded applicants to report to the Secretary annually. The performance report is used on an annual basis as one of the methods of monitoring whether grantees have made substantial progress towards project goals as stated in approved applications. Without it, there is no way to document sufficient progress annually.

7. Explain any special circumstance 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 that 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.**

None of the special circumstances listed apply to this data 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.

We will publish both a 60 and a 30-day Federal Register notice inviting public comment. We will publish the 60-day federal register notice on _____. We will also publish the 30-day federal register notice on _____.

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

Respondents will not be provided any payments or gifts for data collection.

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

ED is not requesting any confidential information and as such, no assurances of confidentiality are necessary.

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.

This data collection does not have any questions of a sensitive nature for matters that are commonly considered private.

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 16 of IC Data Part 1.

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 be included in Item

Total Annual Burden Hour calculation for the Early Reading First Performance Report: 3,005 total burden hours

ED estimates that over the next three years, approximately 135 Early Reading First grantees will be required to use Early Reading First performance report either as an annual or final performance report (estimate based on number of grantees awarded in the last three years, which ranges from 31-33 grantees annually since 2005). Approximately 100 grantees will use this form as an annual performance report and approximately 35 will use this form as a final performance report. The annual burden hours per response is estimated to average 22 hours for annual performance reports and reflects the estimated time grantees spend reporting on project progress and performance and addressing administrative requirements. The annual burden hours per response is estimated to average 23 hours for final performance reports and reflects the estimated time grantees spend reporting on project progress and performance and addressing administrative requirements. It is estimated that it will take respondents slightly longer to complete the final performance report than the annual performance report because the Early Reading First final performance requires respondents to provide additional summary information for the entire project period relating to project impact and success. The burden hour averages for annual and final performance report respondents listed above are based on it taking respondents 19 to 25 hours to previously used performance report, ED FORM 524B.

Annual Burden Hour Calculations for the ERF Performance Report:

Burden Hours for ERF performance report when Used as an Annual Performance Report: 22 hours/response X 100 responses/year = 2,200 total annual burden hours.

Burden Hours for ERF performance report when Used as a Final Performance Report: 23 hours/response X 35 responses/year = 805 total annual burden hours

Total Annual Burden Hours for ERF performance report: 2,200 burden hours (annual performance report) + 805 burden hours (final performance report) = 3,005 total annual burden hours.

Total Annual Cost Burden to Respondents for the ERF performance report 3,005 total burden hours x \$36/hour = \$108,180.

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.

This collection has 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 ERF Performance Report: \$13,520

The total annual cost is based on the following:

ERF Performance Report as Annual Performance Report: 3 hours per response x 100 responses x \$32/hour (GS-12 hourly rate) = \$9,600

ERF Performance Report as Final Performance Report: 3.5 hours per response X 35 responses X \$32/hour (GS-12 hourly rate) = \$3,920

15. Explain the reasons for any program changes or adjustments reported in Item 16 of IC Data Part 1.

The information collection is not a new collection as it is revised form with similar content to the Grant Performance Report ED FORM 524-B. There are no start-up costs.

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 formally publish the results of this data collection. Rather, the data obtained through this data collection will be used by the program office to monitor the funded ERF grantees and inform GPRA results for the program.

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.

Program is not seeking approval to not display the expiration data for OMB approval. All data collection instruments will include the OMB expiration date.

18. Explain each exception to the certification statement identified in the "Certification for Paperwork Reduction Act Submissions" Form.

There are no exceptions to the certification statement identified in the "Certification for Paperwork Reduction Act Submissions" Form.

B. Collections of Information Employing Statistical Methods.

This data collection applies to ERF grantees. This tool will not employ any statistical methods.