

Application for Open Innovation Web Portal:

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

A.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.

On February 17, 2009, President Barack Obama signed into law the American Recovery and Reinvestment Act of 2009 (ARRA). This sweeping economic recovery package provides the largest Federal investment in education in our Nation's history. Included in ARRA was the Investing in Innovation grant program (i3), which was established as the "Innovation Fund" in the "American Recovery and Reinvestment Act of 2009" (ARRA), signed into law by the President on February 17, 2009. The i3 program provides \$650,000,000 in competitive grants to Local Education Agencies (LEAs), non-profits working in collaboration with LEAs, or non-profits working in collaboration with a consortium of schools. The grants will fund the development, validation, and scaling of new and innovative solutions as well as solutions of proven effectiveness, with a focus on supporting effective teachers and school leaders, improving the use of data, supporting the implementation of high standards and high-quality assessments, and turning around failing schools.

As part of its ongoing commitment to innovation in education, of which i3 is an important component, the U.S. Department of Education's (ED) Office of Innovation and Improvement (OII) has developed a web-based platform, the Open Innovation Web Portal (Portal), to support communication and collaboration among a wide range of key education stakeholders, including practitioners, funders, and the general public. To that end, the Portal will collect information from stakeholders, provided voluntarily, and enable others to view the information in a single web location.

Because the i3 program seeks to identify innovative new approaches, the Department hopes that applicants will include individuals and organizations that have previously had limited experience in the education sector yet have promising evidence-based ideas for improving American education. These applicants in particular face challenges in identifying schools or LEAs with which to partner given their limited experience in the field. Further, organizations without existing relationships in education may find it difficult to secure the private sector matching funds required of all grantees under ARRA. Receiving OMB's approval on an emergency basis

is thus essential to launching the Portal and supporting improved student achievement through school improvement and reform, one of the primary objectives of ARRA.

A.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 collected is in the format of an online web form that requests basic contact information, and if a user chooses to submit an idea, general information about the idea and responses to a series of more detailed questions that provide additional information about what the idea is, what experience the idea owners possess, and what type of assistance they desire.

- Registration: basic user information including email address and a username that will be the means of identification on the Portal;
- General biography: ability to edit user name and email, as well as provide general geographic location to allow users to find geographically proximate partners;
- Idea overview: name and location of the idea, contact information, and basic keyword and filtering information
- Detailed questions: open response questions that allow users to provide more information about their idea
 - What is the basic idea? (including an introductory video)
 - What education challenge does your idea address?
 - Why is your idea innovative?
 - What evidence supports your idea?
 - What is the plan for/possibility of scaling your idea?
 - What experiences have you had that contribute to the idea?
 - What experiences have your team had that contribute to the idea?
 - What types of organizations are supporters of your idea?
 - What are the most important lessons that the field can learn from your idea?
 - What type of partners are you looking for?
 - What type of information or expertise are you looking for?
 - What type of resources aside from funding are you looking for?
 - What is the project related to your idea for which you are seeking funding?
 - Total project budget?
 - Total funding sought?
 - Matching funding sought?
 - Cost per student (startup and run rate)
 - Project duration
 - What is the sustainability plan for your idea if external funding ends?

This is a new collection. Except for evaluation of the usability and general use trends, the Department does not anticipate using the information contained on the site itself. The site is developed as a tool and community for users to communicate and improve their ideas.

A.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 requested under this collection will be gathered entirely through electronic means, either through direct entry of information into profiles by users of the Portal or through transfer of some information from ED to the Portal through an automated process. The option of transferring information to the Portal was chosen as a way to reduce burden for users who had already entered a portion of the information contained in a Portal profile as part of their application for an i3 grant.

If users wish to join the Portal, they will register electronically to create a user name and profile and then subsequently will populate their personal profiles and their idea profiles on the website by filling in as many of a series of web forms as they desire.

A.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 majority of the information that users may enter to populate a profile on the Portal is unique to the Portal and is not information ED has previously collected. Specifically, the Portal will be collecting information about potential applications to i3, a new grant program, and information about new and promising innovations that may not be addressed by other federal grant programs.

ED is making significant effort to minimize duplication through the automated transfer of some profile information as described above. This process will transfer information, with the permission of users, if they have already entered information as part of the i3 grant application and simplify the user process of creating a profile on the Portal.

A.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.

While some small businesses may choose to join the Portal and subsequently may choose to create innovation profiles on the Portal as a way of publicizing their ideas, the burden on small businesses and other small entities is minimal. As previously noted, the information collection is voluntary and for the benefit of the community of users of the Portal, so users will be able to tailor their level of participation.

A.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 primary consequence of failing to collect this information would be a lower quality set of applications to the i3 program, particularly from those individuals or organizations who have not been participants in education innovation in the past. Without the Portal and its related collection, these individuals or organizations will likely struggle to identify partners with whom to apply for i3 grants and funder from whom they can secure the private sector matching funds

required under ARRA. This would have a deleterious effect on ED's ability to support innovation in education, clearly indicated as a policy priority through the establishment of the Investing in Innovation fund.

A.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.*

We do not anticipate special circumstances that would cause collections as described above.

A.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.

Although this collection will be submitted under emergency processing, the public will have an opportunity to comment during this emergency processing.

The public will have the further opportunity to comment as this information collection approval request undergoes regular processing subsequent to the emergency processing.

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

No payments or gifts to respondents have been made.

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

There is no assurance of confidentiality.

A.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.

There are no questions of a sensitive nature, as described above. Users may provide information about their ideas that will be shared in a public and openly accessible forum, which is justified given the expressed purpose of the portal to facilitate communication and collaboration among key education stakeholders. Users who voluntarily participate in the portal may choose the extent to which they disclose information of this type and are not required to answer any questions that reveal sensitive information.

A.12. Provide estimates of the hour burden of the collection of information.

ED estimates that in the context of the i3 grant competition, approximately 125 prospective applicants for Scale-Up grants, 700 prospective applicants for Validation grants, and 1600 prospective applicants for Development grants will use the Portal. We estimate that the population of users who join the site and participate in capacities other than i3 will be approximately equal to the size of the i3 population.

- Total i3 prospective applicants: 2,425
- Other participants: 2,425

The average burden per prospective applicant is estimated to be 3 hours per applicant and 2 hours 5 minutes for participants. The estimate of burden was based on the following estimates of amounts of time:

Part	Time Burden	Users Affected	Total Time Burden (Hours)
Registration	5 minutes	Prospective Applicants & Others: 4,850	404
Submission of idea	55 minutes	Prospective Applicants:	2,223

		2,425	
Ongoing participation on the portal	2 hours	Prospective Applicants & Others: 4,850	9,700

The total time burden is 12,327 hours.

ED estimates that the average per-hour cost to possible respondents is \$35 (average hourly pay for an American teacher¹) for a total of \$431,445.

A.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.)

Based on the figures above, we estimate average user time on the portal to be 0.25 hours/week, or 13 hours per year. Based on our above population of active users of 4,850 and hourly cost of \$35, the total annual cost would be \$2,206,750.

A.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 development and hosting of the portal are provided through a gift arrangement so incur no costs. There will be minor costs associated with staff time for ongoing support and development of the online community.

- Grade 13: 5 hours a week x 52 weeks at \$42.66/hour = \$11,092
- Grade 15: 1 hour a week x 52 weeks at \$59.30/hour = \$3,083

Estimated total Federal cost = \$14,175

A.15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.

This is a new collection for a new program.

A.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

¹ This estimate is based on the assumption that applicants to the i3 program will be professionals with a significant representation of the field of education. The per hour average comes from a Manhattan Institute study.

schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information shared by participants in the Portal will be published immediately on the Portal website.

Some information collected may be analyzed in an aggregate manner to understand participation trends and other general performance metrics about the Portal. Such information would likely be shared on a government website such as the Portal website or ed.gov.

Because the portal is an ongoing tool available for use by the education community, the ending date of the collection of information is unknown and largely dependent on the level of participation on the Portal following its launch.

A.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 expiration date will be displayed on the website.

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 is not requesting any exception to the Certification.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.