

**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.

The Department of Education is seeking OMB approval for a Generic ICR clearance for ED's outreach contests. The U.S. Department of Education's outreach contests are a major component of overall outreach and public engagement on national education initiatives. The contests (video, essay or other format) are designed to engage citizens, particularly students, teachers and parents, across the country in creating a nation-wide campaign to promote improving public education. The generic clearance is necessary for ED to launch several contests annually in a short turnaround. The information collected for these contests includes first name, last name, email, city, state and when applicable (i.e. student-targeted contests) grade, school and age but not date of birth. This data is necessary to identify contestants as eligible participants, and to collect contact information to follow up if their work is selected as a finalists and/or subsequent winner. Upon entry or during the judging process, applicants under the age of 18 may be asked to confirm parental consent, requiring students under 18 to have a parent signature in writing on a parental consent form provided by the Department in order to qualify for the contest. The contests will cover a variety of topics related to education. Eligibility will be outlined in the specific criteria of each contest and will only apply to US citizens.

It is estimated that ED will launch approximately 4 contests per year. The Department previously obtained OMB approval for a video contest entitled "I Am What I Learn" under OMB Control Number 1860-0507. That contest was open to K-12 students to submit videos of 2 minutes or less that conveyed the importance of education and the student's individual academic goals. The registration form included first name, last name, email, age, grade, school, city, and state. The purpose of this generic clearance is to permit the Department to conduct similar outreach contests.

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 collection of information under the Generic Clearance will take place during the first stage of each of the proposed contests. At most the collection of information will include the name,

city and state, email and phone number of each participant. The collection of information will be retained for the duration of the contest, until the date the prize is awarded and/or winners are announced. Participant information will be collected and managed by the U.S. Department of Education for the purpose of determining eligible participants and notifying the winner(s).

At the time of contest entry, contestants must certify that their submissions are original work with original content. Submissions containing unoriginal content will be disqualified from the respective contest. The collected information will be destroyed within 6 months of the conclusion of the contest.

For some contests, the Department may also require contest entrants under age 18 to confirm parental consent, by providing written signature of a parent or legal guardian via a parental consent form provided by the Department. The Department estimates that this may add up to 60 additional minutes to the time needed to complete the contest entry.

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 collection of information will be determined on an ad hoc basis. The contests will be hosted primarily on the Education Department website, but potentially promoted through external sites like Youtube, SchoolTube and/or Viacom.

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 not aware of other collections that gather contest entries from the education community, but will be mindful of activities by other Federal agencies that are similar.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

Each collection will not impact 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.

Each contest cannot be completed without a collection of data and each will require a one-time collection.

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;

The participants will be required to submit their information one time only in order to participate in the corresponding contest.

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

The respondents will be required to respond as directed in the respective contest's guidelines.

- requiring respondents to submit more than an original and two copies of any document;

Respondent will only submit one original copy for a given contest.

- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

No records will be retained.

- 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;

N/A

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

N/A

- 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.

N/A

This collection is consistent with 5 CFR 1320.5.

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.

N/A

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.

No public comments were received during the first video contest, "I Am What I Learn." A 60-day comment period was provided for this generic clearance however, no comments were received. The individual contests will be similar in instructions with different topics and eligibility criteria.

The Department will collaborate with video streaming websites such as Youtube to host and promote the contests as well as facilitate contest submissions.

The Department will collaborate with external organizations such as Youtube, SchoolTube and/or Viacom to discuss possible promotion ideas.

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

Awards for each contest under this generic clearance will be determined on an ad hoc basis. However, monetary and nonmonetary awards will be donated by third-party stakeholders. No payment or gift will be provided to encourage contest entry.

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

We will not provide assurance of 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.

We will not solicit submissions that would include sensitive information.

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

The Department anticipates receiving approximately 500 respondents for each contest under this generic clearance. Each participant will create an entry (e.g., video, essay). The Department estimates that this entry would take up to 5 hours to create.

Additional paperwork to confirm eligibility, such as a parental consent form may add up to 60 additional minutes to completion. Note that the consent form will only be used for each contest requiring a consent form where there are entrants under the age of 18, and in most if not all cases, only for entrants who qualify as a finalist and/or winner.

500 participants x 5 hours = 2,500 hours
2,500 hours x 4 contests per year = 10,000 hours annually

500 participants x 60 minutes = 30,000 minutes (500 hours)
30,000 minutes x 4 contests per year = 120,000 minutes (2,000 hours annually)

Total: 12,000 hours annually for 4 contests per year

Since ED anticipates up to 4 contests per year, the annual generic clearance hours would be 2,000 responses at 12,000 hours. Each generic IC (or individual contest) will be drawn down from the overall clearance total.

There will be no cost or cost of services imposed upon respondents. Respondent may choose whether to participate and complete necessary steps to qualify for a given contest.

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 will be no cost imposed upon respondents. The Department is conducting the contest with the assumption that respondents will use services and materials already available or commonly available in schools (i.e. computer, video equipment).

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.

Cost will be determined on an ad hoc basis. For the ED's first video contest, the estimated government cost was \$13,563.48. It is estimated that each contest will average at the same cost. The overall annual cost for 4 contests is estimated to total \$54,254.00.

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

This is a revision to make this clearance a Generic ICR. This will allow ED to submit each individual contest through this generic clearance. Therefore, the hours have increased to allow for four contests to be launched by ED on an annual basis.

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.

An outline and timeline for each contest will be determined on an ad hoc basis.

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 control number and 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.

There are no exceptions.

B. Collection of Information Employing Statistical Methods

This collection does not employ statistical methods.