Supporting Statement for Paperwork Reduction Submission
Gulf Coast Recovery Grant Application
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

The Gulf Coast Recovery Grant (GCRG) is a new discretionary grant initiative authorized in Pub. L. 111-117 – the Consolidated Appropriations Act, 2010. The Act reserves $12 million for competitive grants to provide funding to local educational agencies (LEAs) in counties in Louisiana, Mississippi, and Texas that were designated by the Federal Emergency Management Agency as counties eligible for Individual Assistance due to damage caused by Hurricanes Katrina, Ike, or Gustav. Funds can be used to improve education through such activities as replacing instructional materials and equipment; paying teacher incentives; constructing, modernizing, or renovating school buildings; beginning or expanding Advanced Placement or other rigorous instructional curricula; starting or expanding charter schools; and supporting after-school or extended learning time activities.

The requirements under this grant include information collection activity covered under the Paperwork Reduction Act (PRA). The activity consists of the development of a new application for a LEA to submit to the U.S. Department of Education (Department) to apply for FY 2010 funds.

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 form of a single application submitted by the LEA. The information will be used to implement the GCRG initiative and improve education in counties in Louisiana, Mississippi, and Texas that were damaged due to Hurricanes Katrina, Ike, or Gustav.

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 LEAs will submit application electronically. 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 is no duplication in the collection.

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 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.

The consequence of not conducting the collection of information under the Gulf Coast Recovery grant application process would be that LEAs would not be able to receive funds and the initiative would not be implemented.

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. 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.

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 public will have the opportunity to comment during the 30-day period for the regular collection.

9. Explain any decision to provide any payment or gift to respondents, other than renumeration 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.

The Department 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

The competitive application includes information collection activities for LEAs only. The total Burden Hour calculation for the completion of the GCRG application is 6,800 hours. The Department estimates the per-hour cost at the local level will average $30 per person (approximately GS-12 equivalent) hour for a total of $204,000. We provide a description of each activity and accompanying burden estimate in the table below. The table represents the estimate for LEAs.

Local Educational Agency Estimates

GCRG Activity	Number of LEAs	Hours/ Activity	Hours	Cost/ Hour (GS-12)	Cost
Complete LEA Application	200	34	6,800	$30	$204,000
Total Burden Hours and Cost	**200**	**34**	**6,800**	$30	**$204,000**

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.

There are no 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.

The Federal costs will involve screening the applications, managing the grant review, and awarding funds to LEAs. Calculations include:

- Grade 12: 200 hours at $35.88/hour = $7,176.00
- Grade 14: 200 hours at $50.86/hour = $10,172.00

The Department plans to award a contract for assistance with the application review. The value of the award is expected to be $200,000. The total includes cost for contractual support, calls, printing, mailing expenses, reviewers honoraria, and other logistical support expenses.

<u>We estimate total cost to the Department to be $217,348.</u>

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

This is a new collection related to a new program.

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.

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 GCRG grantees. This tool will not employ any statistical methods.