

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1820-0028. The time required to complete this information collection is estimated to average 45 hours and 40 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: U.S. Department of Education, Washington, D.C. 20202-4651. If you have comments or concerns regarding the status of your individual submission of this form, write directly to: Office of Special Education Programs, U.S. Department of Education, 400 Maryland Avenue, S.W., PCP 4106, Washington, D.C. 20202-2600.

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. Circumstances that make the collection of information necessary.

The collection of information (application for grants) is necessary to ensure that potential applicants provide the information necessary for the Department of Education to ascertain the eligibility of the applicant and determine the programmatic responsiveness and technical quality of the application. The Education Department General Administrative Regulations at Part.74.12(b) stipulates that, in making competitive grant awards, applicants shall use the SF-424 series and those forms and instructions prescribed by the Secretary. The Individuals with Disabilities Education Act, which provides the programmatic authority for this collection, requires that grant awards under these programs be made through competition.

2. How, by whom, and for what purpose the information is to be used.

The information requested in the Grant Application Form will be used by Education Department program managers to determine the relative quality of grant applications. Peer reviewers will assist in this process by evaluating

applications. Based on the peer review, applications are ranked and a decision is made by the recommending official as to award.

3. Use of automated, electronic, mechanical, or other technological collection techniques.

Applicants do have the option of submitting applications electronically.

4. Duplication.

Information requested in the application is not available from any other source. Applicants must provide substantial information that is uniquely responsive to the grant announcement.

5. Impact on small businesses.

The collection of information does not significantly impact small business or other entities. In almost all grant programs included in this announcement, small businesses are not among the eligible applicants. In those few instances where they are eligible, the amount of information requested is not excessive, but rather is essential to determine the quality of the application.

6. Consequences of no or less frequent collection.

If the collection were not conducted, there would be no documentation for decisions to award grant funds. If the collection were conducted less frequently the Department would not have timely information on which to evaluate and rank applications. Technical and legal obstacles to reducing burden would emanate from the resulting lack of sufficient information upon which to base the award of funds, which, by statute, must be awarded through competition.

7. Special circumstance.

Applicants are reminded that current Government-wide policy requires that an original and two copies be submitted, however, applicants are requested to submit an original and five (5) copies of the application. The additional copies are required to provide sufficient copies for peer reviewers, and for administrative purposes including data entry and a copy for the project officer. If fewer copies were provided by the

applicant, the Department would need to make additional copies of the application which would result not only in a delay of the peer review and grant award, but also in possible inequities in the review caused by errors on copying or collating of application materials. Experience has shown that applicants prefer to send additional applications in order to benefit from earlier decisions and ensure that all application materials reviewed by the Department are in order.

8. Consultation outside agency.

Consultation was not sought on the application package since it includes only necessary information for applicants and standard forms that are required for all application packages issued by the Department.

9. Payment or gift.

Not applicable.

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

No assurance of confidentiality is provided to applicants. After awards are made, applications may be made available to all interested parties.

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.

Not applicable.

12. Hour burden of the collection .

Number of respondents: Estimated 800.

Frequency of response: Once per year.

Annual hour burden: Average 25 hours per respondent; range from 20 to 50. The application package includes other OMB-approved forms that have their own data

burden associated with them. The estimate of data burden provided above does NOT include the burden associated with these other forms: OMB Form 1875-0106 "Application for Federal Educational Assistance"; OMB Form 1875-0102 "Budget Information"; OMB Form 0345-0045 "Disclosure of Lobbying Activities".

How the burden was estimated: Estimates provided by agency staff who have previous work experience in State and local education agencies and universities, the primary eligible applicants under these programs.

Annualized cost to respondents: Average 25 hours x \$40 per hour + \$ 1,000 per respondent. (Assume average salary plus overhead and fringe benefit of \$80,000)

Total for all respondents: 800 applications x \$1,000 per respondent = \$800,000.

13. Annual cost burden to respondents or record keepers.

Capital and start-up cost: None.

Operation and maintenance and purchase of services: None.

14. Annualized cost to the Federal government

Federal staff costs: \$135,000. (Assumes 1.5 FTE at GS 12)

Contractor support costs: \$350,000

Peer review costs: \$1,380,000. (Assumes 600 at \$ 2,300 each)

Supplies: \$4,000

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

OSEP has reduced the annual reporting and recordkeeping hour burden by 10,000 from the previously approved collection. Over the past five years, OSEP has experienced a reduction in the number of applications submitted across the Part D programs. And, in the past 3 years we have received

between 400-800 applications across programs. That is substantially less than the 1,200 applications received under the previously approved collection. We believe this is in part due to the transfer of the Part D, research and studies and evaluation discretionary grants to the authority of IES (as mandated by Statute). We typically received 200-300 applications for research grants under Part D. In addition, OSEP has combined grants where appropriate under several of the Part D programs thereby reducing the number of competitions announced. Over the last few years, OSEP has also combined data collection systems. The State Personnel Development Grants program (previously known as the State Improvement Grants program under the 1820-0620 collection) has been added to this Part D umbrella collection. The 1820-0620 collection included a Q & A document that is no longer relevant to the program and has not been used for several years. Other than the Q & A, there was no difference in the 1820-0620 collection and the 1820-0028 Part D umbrella collection.

16. Plans for tabulation and publication.

None.

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.

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.

No exceptions requested.

B. Collections of Information Employing Statistical Methods

Not applicable.