

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Office of the Secretary (OS) Information Collection
OMB. Control # 1894-0006 v. 3 (formerly 1890-0009)
Generic Application Package**

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 U.S. Department of Education (ED) supports a wide range of discretionary grant programs through grants to eligible applicants including State Education Agencies, Local Education Agencies, Indian Tribal Governments, Institutions of Higher Education, Non-Profit Organizations, Faith-Based Organizations, Businesses, Hospitals and Individuals. Discretionary grants are awarded on the basis of competitively reviewed applications, and ED is requesting an extension for the Generic Application Package that numerous ED discretionary grant programs use to provide to applicants the forms and information needed to apply for new grants under those grant program competitions.

The Department will use this Generic Application package for discretionary grant programs that: 1) use the standard ED or Federal-wide grant applications forms that have been cleared separately through OMB and 2) use selection criteria from the Education Department General Administrative Regulations (EDGAR); statutory selection criteria or a combination of EDGAR and statutory selection criteria authorized under EDGAR, 34 CFR 75.200. The use of the standard ED grant application forms and EDGAR and/or statutory selection criteria promote standardization and streamlining of ED discretionary grant application packages. This request reflects a burden estimate for grant competitions from several program offices including: Office of Elementary and Secondary Education (OESE), Office of Innovation and Improvement (OII), Office of English Language Acquisition (OELA), Office of Safe and Drug Free Schools (OSDFS), Office of Special Education and Rehabilitative Services (OSERS), Office of Postsecondary Education (OPE) and the Institute of Education Sciences (IES).

Since December 2001 approval by OMB, the 1894-0006 Generic Grant Application is the most streamlined ED process for discretionary grant applications, including new or existing discretionary grants. There are no required public comment periods for new individual grant applications since the Master Plan IC request provides the public opportunity to comment. Program offices may submit any new individual discretionary grant applications for inclusion under this process as long as they use EDGAR selection criteria or statutory criteria, in addition to standard forms. No grant applications containing program specific information fits under this process; otherwise, ED must use the 1894-0001.

Differences in any new individual grant application packages added under the Generic Application Package collection after this Master Plan request is approved would be reflected in the official application notices for each program published in the Federal Register and the information provided about the program in the discretionary grant application packages. Notices of priority and official application notices are cleared through the Department's Division of Regulatory Service in the Office of General Counsel and public comment is sought when required. The information contained in the official application notice and/or application packages may include background information on the program and grant competition, priorities, and statutory selection criteria and/or EDGAR selection criteria.

To obtain OMB approval for a new generic grant application not included as part of this Master Plan submission, ED would submit the request via the OMB83C (change worksheet) process in ROCIS with

the individual added burden hours added to the cumulative total already approved. In addition, a copy of the draft closing date notice or notice of priorities would be submitted with this request. Based on the original OMB/ED agreement, the clearance time for a new generic grant submission would be 10 days at OMB.

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.

A listing of the standard ED or Federal-wide grant application forms, EDGAR selection criteria and examples of other information that programs include in the Generic Application Package (e.g., Title Page, Abstract, Narrative and Evaluation Language) are attached. These application components are necessary to standardize grant applications and to ensure that the information required to process and review them effectively and to make funding decisions is submitted by applicants.

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.

In FY 2007, 100% of ED's discretionary grant application packages were available in Grants.gov FIND and all ED discretionary grant competitions that were able to, participated in Grants.gov APPLY. In FY 2007, approximately 71% of ED's discretionary grant applications were received electronically either through Grants.gov or e-Application (approx 10%). In FY 2008 and beyond, ED expects that the number of applications submitted via Grants.gov will continue to increase. Accordingly, for this collection, we estimate that 75% of respondents will submit their grant applications electronically.

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.

This information collection is intended to serve as a generic application package for use by numerous discretionary grant programs from across the Department's grantmaking offices. Use of the standard ED or Federal-wide grant application forms and selection criteria that is already established in the Department's EDGAR regulations or in the individual program's statute encourages ED program offices to utilize standard forms and criteria that the public has already had the opportunity to comment on previously and eliminates the need to develop and clear program-specific forms and regulatory selection criteria.

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.

Under EDGAR regulations, all requirements for small entities are minimized. The burden is kept to a minimum by requesting that applicants provide only information required by statute and EDGAR.

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 administration, determination and distribution of program funds could not be accomplished if the information was collected less frequently. The frequency of the application is mandated by the respective legislation and program regulations and the availability of ED funding for new grant competitions.

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.

This information will not be collected in a manner inconsistent with the general information collection guidelines in 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 Department published both the 60 and 30-day Federal Register Notices inviting public comment and received none.

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

There are no payments or gifts to respondents other than the remuneration of grantees.

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

There are no assurances of confidentiality provided to respondents using this information collection.

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.

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 13 of OMB Form 83-I.
- 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 not be included in Item 14.

The listing of the individual programs that will use the Generic Application Package and their respective burden hours are shown in the attached document entitled, "Discretionary Grant Programs Using the Generic Application Package." The total burden hours for all the programs using the generic application package are 380,550 hours with a respondent total of 10,235.

Estimates of Annual Cost Burden to Respondents for this Information Collection.

$\$48.37/\text{per hour (fully-loaded GS-12 equivalent hourly rate)} \times 380,550 \text{ total burden hours} = \$18,407,204$

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.

Total Annualized Capital/Startup Cost : \$.00
 Total Annual Costs (O&M) : .00

Total Annualized Costs Requested : \$.00

There are no other respondent costs beyond those provided under item 12.

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.

Review by program staff (1700 funded grants X 4 hours x \$48.37per hour (GS-12 hourly rate [fully-loaded]).....	\$328,916
Review by outside reviewers..... [Based on historical cost data from previous competitions and cost estimates for future competitions.]	\$6,480,000
Total.....	\$6,808,916

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

While the total number of estimated respondents (applications) has decreased overall, the estimated number of total burden hours has increased. This increase in burden hours results to more accurate burden hour estimates being provided by ED program offices based on program experience with using the Generic Application Package for a wide variety of ED discretionary grant programs.

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.

The Department of Education does not publish this data or use statistical methods in this collection of information.

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.

OMB approval of this information collection with both 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 to the Certification Statement.

B. Collection of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on Form 83-I is checked "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe the potential respondent universe (including a numerical estimate) and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, state and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

Not applicable.

2. Describe the procedures for the collection of information, including:
 - Statistical methodology for stratification and sample selection.
 - Estimation procedure.
 - Degree of accuracy needed for the purpose described in the justification.
 - Unusual problems requiring specialized sampling procedures, and

- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

Not applicable.

1. Describe methods to maximize response and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.

Not applicable.

2. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

Not applicable.

3. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other persons who will actually collect and/or analyze the information for the agency.

Not applicable.