SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION

INVESTING IN INNOVATION (i3) GRANT PROGRAM

Justification:

1. Explain the circumstances that make the collection of information necessary.

   The Investing in Innovation (i3) Fund was established under section 14007 of the American Recovery and Reinvestment Act of 2009 (ARRA). Since this is a competitive program, the Department needs to collect applications in order to determine which eligible applicants should receive a grant award. The Department will make three types of awards under this program: Scale-Up Grants, Validation Grants, and Development Grants. These grants will provide funding to support local educational agencies (LEAs), and nonprofit organizations in partnership with one or more LEAs or a consortium of schools to apply for funding to expand and develop innovate practices that can serve as models of best practices, (2) allow eligible entities to work in partnership with the private sector and the philanthropic community, and (3) identify and document best practices that can be shared and taken to scale based on demonstrated success. On January 28, 2010, Office of Management and Budget (OMB) cleared the application on an emergency basis with the expiration date of 9/30/2010. At this time, the Department is requesting that this application be approved for a full three-year renewal.

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

   The information provided in the application will allow field readers and the Department of Education to determine if applicants are eligible and identify which applications qualify for funding. An additional part of the application consists of assurances regarding the applicant's compliance with applicable Federal laws and regulation in 34 CFR 76.132.

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.

   Applicants are required to submit applications electronically to the U.S. Department of Education.

   All applicants are currently required to submit their applications electronically through the Department's E-grants application system.

4. Describe efforts to identify duplication.

   The information supplied by the applicant is not contained in any other data collection, and is unique to this program and the particular grantee.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

   Small businesses are not impacted by this data collection.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently

   The Department cannot distribute these grant awards to recipients without an application requesting the funds. If no application information were collected, the Department would not know which organizations want or merit funding.

7. Explain any special circumstance that would cause an information collection

   There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

8. 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.

   The Department has consulted with potential applicants, other interested organizations and entities to obtain their views on the availability of possible requested information and potential application processes for these grants. In addition, on October 9, 2009, the Department published a Federal Register notice requesting public on the proposed requirements, definitions, priorities, and selection criteria for this program and incorporated such feedback into the competition's final requirements. The Department is submitting this request to the Office of Management & Budget through a streamlined clearance process which requires only a 30-day Federal Register Notice.

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

No gifts or payments will be made to application respondents other than the award to the grant recipient.

10. Describe any 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 respondents.

11. Provide additional justification for any questions of a sensitive nature

There is no question of sensitive nature in this collection of information.

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

As previously stated, after the submission and approval of the emergency clearance, OII received approximately 1700 applications for the 2010 i3 grant competition. We originally anticipated that we would receive 2700 applications for the i3 grant therefore; we have had to adjust the expected applications amount to reflect the amount we actually received and to account for the amount we expect to receive each year of the three year renewal. Although we received approximately 1700 applications, we have determined that for a three year renewal we should account for an increase of 100 applications per year to reflect the expected 2000 applications. The following breakdown below details the reduction in the number of applications we expect to receive, however the burden to the applicant has not changed. OII has made every effort possible to reduce the burden to all respondents.

Scale Up Grants:

Estimated data burden for Scale-Up grants:

Annual reporting burden per response (preparing and submitting application): 120 hours x 100 applicants = 12,000 hours

Estimated respondent cost for Scale-Up grants:

Estimated respondent cost for an application is based on 120 hours per application for Scale Up grants. The figure of 120 hours is based on our own experience and comments from eligible applicants that we consulted.

We estimate respondent cost at an average of $25 per hour so that the average cost
per application would be $25 x 120 hours = $3000.

We expect to receive a total of 100 applications from eligible applicants. Total estimated cost for Scale-Up grants: $3000 x 100 applications = $300,000

Validation Grants:

Estimated data burden for Validation grants:

Annual reporting burden per response (preparing and submitting application):
120 hours x 400 applicants = 48,000 hours

Estimated respondent cost for Validation grants:

Estimated respondent cost for an application is based on 120 hours per application for Validation grants. The figure of 120 hours is based on our own experience and comments from eligible applicants that we consulted.

We estimate respondent cost at an average of $25 per hour so that the average cost per application would be $25 x 120 hours = $3000.

We expect to receive a total of 500 applications from eligible applicants. Total estimated cost for Validation grants: $3000 x 400 applications = $1,200,000

Development Grants:

Estimated data burden for Development grants:

Annual reporting burden per response (preparing and submitting application):
60 hours x 1500 applicants = 90,000 hours

Estimated respondent cost for Development grants:

Estimated respondent cost for an application is based on 60 hours per application for Development grants.   The figure of 60 hours is based on our own experience and comments from eligible applicants that we consulted.

We estimate respondent cost at an average of $25 per hour so that the average cost per application would be $25 x 60 hours = $1500.

We expect to receive a total of 1500 applications from eligible applicants.
Total estimated cost for Development grants: $1500 x 1500 applications = $2,250,000

Grand total for all three (i3) grants:

Estimated overall data burden for all three grants:

Annual reporting burden per response (preparing and submitting application):

Scale-Up grants: 120 hours x 100 applicants = 12,000 hours
Validation grants: 120 hours x 400 applicants = 48,000 hours
Development grants: 60 hours x 1500 applicants = 90,000 hours
Total: 2000 applicants and 150,000 hours

Estimated overall cost burden for all three grants:

Estimated cost for Scale-Up grants: $3000 x 100 applications = $300,000
Estimated cost for Validation grants: $3000 x 400 applications = $1,500,000
Estimated cost for Development grants: $1500 x 1500 applications = $2,250,000
Total: $4,050,000

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no startup costs to respondents.

14. Estimated annualized Federal cost:

There will be at least 5 program personnel dedicated solely to the i3 program along with an assigned contractor therefore $4,050,000 will be the estimated annual Federal cost. We originally anticipated that we would receive 2700 applications for the i3 grant with an estimated annualized Federal cost of $4,950,000 however; we received approximately 1700 applications for the 2010 i3 grant competition which reduced our estimated annualized Federal cost to $4,050,000. This reduction in expected applications required us to adjust the expected number of applications and the annualized Federal cost.

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15.   Explain the reasons for any program changes or adjustments reported in Items 13 or 14

For the emergency clearance request, we had to provide estimates of the expected number of respondents to the i3 grant competition before the May 11, 2010 closing date of the application. Following the closing date, we received over 1700 applications for the i3 program which was a smaller number than the originally anticipated 2700 respondents. In our request for a three year renewal, we have adjusted the expected respondents to 2000 from the originally anticipated 2700 respondents which required us to also adjust the total annual burden hours from the original anticipated 198,000 hours to 150,000 hours. However, this adjustment did not change the burden hours per response.

16.   For collections of information whose results will be published, outline plans for tabulation and publication.

The Department will make the following available to the public on the Department's i3 Web site:

- A list of all applicants and their official partners; the type of grant for which the applicant applied; and the requested budget, including the amount of funds requested for each partner;

- All Scale-up applications with personally identifiable information and proprietary information identified by the applicant redacted;

- All successful Validation and Development applications with personally identifiable information and proprietary information identified by the applicant redacted; and

- Peer reviewer scores and comments (TRFs) for all successful applications.

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 information collection.

18.   Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions form"

There is no exception to the "Certification for Paperwork Reduction Act Submissions"