

Application for Education Jobs Fund Program:

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

A.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.

On 8/10/2010, President Barack Obama signed into law the Education Jobs Fund Act. This economic recovery bill provides an investment in education to retain or create education jobs. It provides needed aid to school districts for the support of early childhood, elementary and secondary education.

Under the Education Jobs Fund (Education Jobs), the US Department of Education (Department) will award grants to Governors based sixty-one percent on relative shares of individuals aged 5 to 24 and thirty-nine percent based on relative shares of total population.

In order to provide immediate assistance to help alleviate the substantial budget shortfalls that school districts are facing, we are committed to providing the Education Jobs allocations within a very short timeframe, necessitating emergency clearance of the Education Jobs program application. Specifically, the statute directs the Department to award each State the total amount that it is to receive within 45 days after the date of the enactment of the Act.

A.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 state governors. To receive its State's allocation under the Education Jobs program, a Governor must submit to the Department an application that provides the following information:¹

- Contact information for the Governor and Education Jobs Fund Program contact.

¹ In the event that a Governor does not submit an application to the Department for Education Jobs funds within 30 days after the date of the enactment of the Act, the Secretary of Education will provide for allocation of funds to another entity or entities in the State for support of elementary and secondary education.

- The signature of the Governor or authorized representative for:
 - Assurances that the State will comply with applicable statutes, regulations and its approved application; accountability; transparency; reporting; and other assurances and certifications.
 - Assurances that the State will comply with the maintenance-of-effort requirements in Section 101(10)A of the Education Jobs Fund Act.
 - Assurances that the State will distribute funds on the basis of the State’s primary elementary and secondary education funding formula(e) as identified in its application for funding under the State Fiscal Stabilization Fund program; or the LEAs’ relative shares of funds under Part A of Title I of the Elementary and Secondary Education Act for the most recent fiscal year for which data are available.
- Current maintenance-of-effort (MOE) data.

This is a new collection. The Department will review the applications for eligibility and will award the funds according to the formula described in the statute.² The Department will use the information collected from this grant application to maintain a record of assurances that are required for the Education Jobs Fund and to receive confirmation from the Governors that the MOE requirements are met.

A.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 information requested under this collection will be gathered by email, fax, or other non-electronic means such as courier or postal service. The Department is not employing electronic means beyond email for this collection due to the very short timeframe of this application process. The employment of electronic means such as an online grants application or data warehouse would require additional time to set up the appropriate structure. The Department expects no more than 51 applications under this collection, and therefore has sufficient capacity to deal with the number of email or paper-based submissions. The information gathered through this process is detailed in A.2.

A.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 assurances and financial information requested under this collection are unique to the Education Jobs program. Even in the event of similar or comparable information for other programs in the past, the assurances are specific to the Education Jobs program and the financial information is specific to the present point in time. Therefore, any comparable financial

² Estimated state allocations for the Education Jobs Fund are available at: <http://www2.ed.gov/programs/educationjobsfund/index.html>

information and assurances that were collected in the past would not satisfy the requirements for this program.

A.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.

The eligible applicants for the ED Jobs program are State governors. No small businesses or entities will be impacted by this collection.

A.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 Education Jobs program application process would be that the Education Jobs program could not be implemented. The Department must conduct this collection in order to disseminate the funds, which will allow States to save education jobs. Failure to distribute the funds could result in job losses and cutbacks in educational spending, resulting in bigger class sizes and the withholding of crucial services. The Department would be out of compliance with the Education Jobs Act if it does not conduct this information collection.

A.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 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.*

This collection is consistent with 5 CFR 1320.5.

A.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.

Although this collection will be submitted under emergency processing, the public will have an opportunity to comment during this emergency processing.

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

No payments or gifts to respondents have been made.

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

There is no assurance of confidentiality.

A.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.

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

A. Burden hours for respondents

The Department estimates that approximately 51 applicants (State governors) will apply. The average burden for the application is estimated to be 2 hours, 6 minutes per

applicant, for 107.1 burden hours total. This is a new collection, with estimate of burden calculated based on prior estimates for similar elements included in the State Fiscal Stabilization Fund application. The estimate of burden was calculated based on program staff experience that it would take a typical governor’s staff member or team of staff members the following amounts of time to complete each section of the application:

Part	Time burden	Basis for calculation
Contact information	2 minutes	Time taken to fill in State contact information.
Assurance	4 minutes	Time taken to read and sign the assurance.
Maintenance of Effort	2 hours	Time taken to research, discuss, and provide or estimate budget support information, and to describe budget data sources.
Total burden	2 hours, 6 minutes	

B. Cost to Respondents

The Department estimates that the per-hour cost at the Governors office staff level will average \$40 per person (GS-13 equivalent) hour for a total of \$4,368 (=2.1 hrs x \$40 x 52 respondents).

A.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 are no start-up costs for this collection.

A.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 reviewing the applications, verifying the requested amounts, and awarding the Stabilization funds to States:

- Grade 13: 156 hours at \$44.08/hour = \$6,876.48
- Grade 14: 13 hours at \$52.09/hour = \$677.17
- Grade 15: 39 hours at \$63.25/hour = \$2,466.75

Estimated Federal cost = \$ 10,020.40

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

This is a new collection related to a new program.

A.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.

Some of the information collected in this grant application may be analyzed with performance data and shared on a government website such as recovery.gov or ed.gov.

A.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 form.

18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

The Department is not requesting any exception to the Certification.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.