SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

TEACH.gov Job Listing Collection and Publishing Process

**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 FY 2009 appropriation for the School Improvement Program, authorizes the Secretary of Education (Secretary) to establish a national initiative, such as the TEACH campaign, to improve the recruitment, training, mentoring, retention, and placement of teachers and principals in order to improve educational outcomes. The authorizing statutes are 20 U.S.C. 6603(b) [Pub. L. 89-10, Title II, §2103, as added by Pub. L. 107-110, Title II, §201, January 8, 2002] and Public Law 111-8, Division F [Omnibus Appropriations Act, Div. F., Labor, Health and Human Services, Education, and Related Agencies Appropriation Act, 2009. Education, School Improvement Programs, National Programs].

The TEACH campaign will help increase awareness of teaching nationwide as a valuable and important profession that warrants serious consideration from competitive candidates when choosing a career path.  Activities will be designed to increase the number, quality, and diversity of candidates seeking to become teachers, particularly in high-need schools, fields, and subjects.

The anchor of this campaign and the resource for the call to action is the TEACH.gov web site. We will provide comprehensive information on steps individuals can take to become a teacher. A major component of TEACH.gov is a job listings section which will aggregate and list existing teacher jobs throughout the United States. This serves two purposes: (i) to provide potential teachers a real-world picture of future employment opportunities, and (ii) to provide certified teachers a “one stop” reference for available teaching jobs.

Approximately 200,000 new teachers are hired each year throughout the United States. Even in the toughest economic times, approximately 80,000 to 120,000 new teachers are hired every year.  Only 4,500 of those hires are African American males.

Additionally, only 7 percent of teachers are African American and 7 percent of teachers are Latino. The Nation also faces a major shortage of individuals who teach science, technology, engineering, and math (STEM).

TEACH.gov is an essential component of the Secretary's effort to increase interest in and access to the teaching profession, particularly among minority individuals, and particularly in teaching science, technology, engineering, and math (STEM). The website will be unique because there is no similarly comprehensive web site in the United States.  It will be a virtual “one stop shopping center” for aspiring teachers to learn about jobs and ways to find a job that is personally best for them.

The Secretary plans to enter into partnerships with several organizations that support increasing interest in, and access to, the teaching profession, particularly among minority individuals and particularly for teaching STEM subjects. These organizations will work with the Department to direct aspiring minority and STEM teacher candidates to TEACH.gov to seek information about career opportunities as a teacher.

The TEACH campaign, which includes TEACH.gov, is a high priority of the Secretary and has the full and enthusiastic support of the President. Indeed, the Secretary is committed to delivering a full functioning Web site for the start of this coming school year, and is scheduled to unveil TEACH.gov to the public next month with endorsements by the President and a variety of celebrities.

To provide prospective teachers with the benefits of this resource prior to the start of the 2010-2011 school year, ED is requesting approval of the included ICR package by August 20, 2010. Simultaneously with this request for emergency approval, we started the process of requesting a full three-year approval of this ICR and submitted to the Office of the Federal Register the first notice requesting comments.

We ask for emergency approval because both the President and the Secretary believe that it is imperative that we increase interest in, and access to, the teaching profession, particularly for minority individuals and individuals who are interested in teaching STEM subjects. The Secretary believes that TEACH.gov will be very effective at achieving this objective, and no other web site currently exists that is as comprehensive as TEACH.gov. We must launch TEACH.gov as soon as possible to meet the needs of schools and school districts in the coming academic year. Without your approval of the Secretary’s emergency request, we will be prohibited from collecting and providing essential information to aspiring teachers in a timely manner. Failure to launch TEACH.gov for this coming academic year would significantly reduce the effectiveness of the Administration's effort to increase the number of minority teachers and teachers of STEM subjects.

1. 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.

This request is for a new collection.

We will request data from interested parties that have PK-12, public school teacher job listings. This information will be used to display job listings on various sections of the TEACH.gov web site.

An interested party may be one of the following:

* Commercial or non-profit job listing source
* State educational agency (*i.e.*, state department of education)
* Local educational agency (*i.e.*, public school district)
* Public school not operating within a school district.

Because TEACH.gov will aggregate job listings provided by participating organizations, we will only collect enough information on a job listing that the Secretary believes would inspire an interested candidate to review full information on the source web site. The information that will be posted on TEACH.gov is as follows:

* Position Title
* Position Category (*e.g.*, Science)
* Position Level (*e.g.*, Grade 8)
* National Center for Education Statistics (NCES) District or School identification number
* A web link back to the original job posting
* Job posting expiration date (if not provided, 30 days)

Three methods will be offered to the job listing provider to collect this data, depending on the providers’ preference and technical capacity:

* Manual entry via a web form – a provider will log on to TEACH.gov and use a web form to post a job listing.
* CSV file upload – a provider will prepare a CSV file offline of its job listings (a template will be provided; the provider will most likely use a spreadsheet). Once complete, the provider will log into TEACH.gov and upload this file to import its job listings.
* XML feed – for providers with many job listings, they may choose to send job listings in a XML file. A provider will generate a XML file with job listings and place this on its web site on a daily basis. TEACH.gov will pick up that XML file daily and incorporate it into the job listing database.
1. 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 collection of information for job listings on TEACH.gov uses 100% electronic submission. Three methods of collection are offered to the end-user to best suit the user’s needs and capacity: web form submission, CSV file upload, and XML feed pickup.

To reduce burden, we are collecting a minimal set of information to publish a summary of a job listing. The source’s job listing on its web site will provide the full amount of detail and information necessary for an individual to apply.

Lastly, the district or school identified in a job listing will be linked to existing NCES Common Core of Data (CCD) (http://nces.ed.gov/ccd/) information on that school or district, including name, address, and fiscal and demographic information.

1. 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.

It is our understanding that a single source of aggregated teacher job listings does not exist on the Internet or within the Department. When possible, information on job listings will be linked to existing sources, such as NCES CCD.

1. 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.

Of the respondents, we estimate 50 will be private or non-profit small businesses and 1,400 public sector small entities. Please see our response to #3 above for the description of minimizing burden to these entities.

1. 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.

TEACH.gov aims to be a comprehensive, end-to-end resource on the teaching profession. Without collecting job listing information, TEACH.gov will lack a primary component to the TEACH campaign’s mission: how to obtain a job in a classroom.

1. 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.

Respondents submit information on a voluntary basis. Respondents are not required to retain records or submit statistical or confidential information or proprietary trade secrets.

1. 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.

Public comment will be sought during the regular OMB clearance process, which will follow directly after emergency clearance.

The TEACH team has had conversations with representatives of the Chief State School Officers, school districts and commercial teacher job listing services to gauge interest in participating in this activity. From the feedback we’ve received thus far, interest is high for this service and we expect participants to submit job listings once clearance has been granted.

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

This information collection does not involve payment or gifts of any kind.

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

Confidential information will not be collected.

1. 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.

This information collection will not include sensitive and/or private questions.

1. 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.

**Annual Burden Hours**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Method** | **Respondents** | **Responses Avg** | **Response Total** | **Mins Per Response** | **Annual Hours** |
|  |  |  |  |  |  |
| Web form entry | 1000 | 10 | 10000 | 6 | 1000 |
| CSV upload | 500 | 50 | 25000 | 1.2 | 500 |
| XML feed\* | 50 | 500 | 25000 | 7.2 | 3000 |
|  |  |  |  |  |  |
| **Total** | **1550** |  | **60000** | **4.5** | **4500** |
| \* The XML feed is an automated process for both the participant and TEACH.gov. The job posting process is likely to occur in an existing Human Resources system or public web site and not exclusively for TEACH.gov. In this, the time to post a listing is zero (0). However, there is a time to implement this approach (detailed in question #13) and estimated five (5) hours per month or sixty hours (60) per year to support. This support estimate has been included in the time to post in the table above. |

 **Annual Hour Burden Per Affected Public**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Method** |  | **Business** | **Non-profit** | **State/local** |  | **Annual Hours** |
|  |  |  |  |  |  |  |
| Web form entry |  | 0 | 0 | 1000 |  | 1000 |
| CSV upload |  | 0 | 50 | 450 |  | 500 |
| XML feed |  | 2100 | 300 | 600 |  | 3000 |

 **Annual Responses and Respondents Per Affected Public**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Method** |  | **Business** | **Non-profit** | **State/local** |  | **Total** |
| Web form entry |  | 0 | 0 | 10000 |  | 10000 |
| CSV upload |  | 0 | 2500 | 22500 |  | 25000 |
| XML feed |  | 17500 | 2500 | 5000 |  | 25000 |
| **Total Responses** |  | **17500** | **5000** | **37500** |  | **60000** |
|  |  |  |  |  |  |  |
| **Total Respondents** |  | **35** | **55** | **1460** |  | **1550** |

 **Annual Cost Burden Per Respondent**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Method** | **Responses Avg** | **Mins Per Response** | **Admin Cost/Hr** | **Total Annual Cost** |
|  |  |  |  |  |
| Web form entry | 10 | 6 | $20.00 | $20.00 |
| CSV upload | 50 | 1.2 | $30.00 | $30.00 |
| XML feed\* | 500 | 7.2 | $90.00 | $5,400.00 |
| \* See note above |  |  |  |  |

 **Annual Cost Burden Per Affected Public**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Method** |  | **Business** | **Non-profit** | **State/local** |  | **Total** |
|  |  |  |  |  |  |  |
| Web form entry |  | $0 | $0 | $20,000 |  | $20,000 |
| CSV upload |  | $0 | $1,500 | $13,500 |  | $15,000 |
| XML feed |  | $189,000 | $27,000 | $54,000 |  | $270,000 |
|  |  |  |  |  |  |  |
| **Total Costs to Respondents** |  |  |  | **$305,000** |

1. 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

**Start Up Costs**

For the web form and CSV upload methods of data collection, there is not a start-up or maintenance cost to the job listing organizations.

For participants that choose to use the XML feed model (for large numbers of listings), some custom software development may be required for their web site. These costs are estimated as follows:

|  |  |  |
| --- | --- | --- |
| **Task** | **Hours** | **Cost (@ $90/hr)** |
|  |  |  |
| Implement | 40 | $3,600.00 |
| Testing | 16 | $1,440.00 |
| Production Rollout | 8 | $720.00 |
|  |  |  |
| **Total** | **64** | **$5,760.00** |

1. 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.

|  |  |  |
| --- | --- | --- |
| **Task**  | **Cost** | **Notes** |
|  |  |  |
| Software Development | $50,000.00 | one time |
| Web System Ongoing Maintenance | $36,000.00 |  |
| Administrative Support | $124,800.00 | 40 hours per week, 52 weeks a year, $60/hour |
| **Total** | **$210,800.00** |  |

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

This is a program change for a new collection of information. This program change is necessary to support a comprehensive teaching profession web resource. As part of this comprehensive resource, job listings that link to existing open positions will provide potential and certified teachers information to help them make decisions about preparing for and seeking a job in the classroom.

1. 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 Job listing information collected will be displayed in multiple sections on TEACH.gov. Each job listing has a maximum display date of 30 days; after expiration of the 30-day period, the job listing information must be re-submitted (this re-submission is necessary to maintain the accuracy and currency of information). TEACH.gov will launch in September 2010 and remain online for the foreseeable years (two post-launch option years have been allotted). Each participant will be made aware of public postings of their listings and the policy regarding expiration of data.

1. 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 OMB control number, expiration date, and related information will be displayed on TEACH.gov.

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

Exceptions are not requested for this submission.

**B. Collection of Information Employing Statistical Methods**

The information collected will not employ statistical methods for gathering or analysis.