SUPPORTING STATEMENT FOR

PAPERWORK REDUCTION ACT SUBMISSION

APPLICATION PACKAGE FOR THE CREDIT ENHANCEMENT FOR CHARTER SCHOOL FACILITIES PROGRAM

(OMB 1855-0007)

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.

An application is required by statute to award the Credit Enhancement for Charter School Facilities Program (formerly known as the Charter School Facilities Financing Demonstration Program) grants. These grants are made to private, non-profits; public entities; and consortia of these organizations. The funds are to be deposited into a reserve account that will be used to leverage private funds on behalf of charter schools to acquire, construct, and renovate school facilities.

These grants are authorized by Public Law 107-110, sections 5221-5231, Title V, Part B, Subpart 2 of the Elementary and Secondary Act of 1965, as amended.

The U.S. Department of Education is seeking OMB approval for an electronic collection for the application for the Credit Enhancement for Charter School Facilities Program.

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 application allows private, non-profits; public entities; and consortia of these organizations to apply for Federal assistance. The applicants will provide a description of their proposed activities and provide information necessary to determine which grant applications should be funded. An additional part of the application consists of assurances regarding the applicant's compliance with applicable Federal laws and regulations.

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 most merit funding.

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.

Applicants will be required to submit a mandatory Grants.gov application to the U.S. Department of Education. We will insert the most recent Grants.gov language in the application package shortly prior to announcing any future grant competition. This language may include some information collection requirements for things such as grant abstracts.

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 information supplied by the applicant is unique to this program and the particular grantee. The application is a single document intended to serve a specific authorized purpose and is in keeping with statutory requirements.

5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), 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, as well as any technical or legal obstacles to reducing burden.

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 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.**

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. 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.

In the past, the Department has consulted with potential applicants, offices within ED, including Budget Service and the Office of General Counsel, and other interested organizations and entities to obtain their views on the availability of possible requested information and potential application processes for these grants. The Department also consulted with field readers for suggestions on improving the grant application. A 30-day federal register notice was published on September 16, 2010 in volume 75, page 56522.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration 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, regulation, or agency policy.

No assurance of confidentiality is provided.

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

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 16 of IC Data Part 1.**

- **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.**

Estimated respondent cost for an application is based on 80 burden hours per application. The figure of 80 burden hours is based on our own experience and the comments from the 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 80 burden hours = $2000.

We expect that a total of 20 applications will be received from eligible applicants. Total estimated cost: $2000 x 20 applications = $40,000.

Estimated data burden for grants:

Annual reporting burden per response (preparing and submitting application):
80 burden hours x 20 applicants = 1,600 burden hours
Total Burden for Grant = 1,600 burden hours

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 startup costs to respondents.

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 salary of the staff that will be conducting the reviews is lower than previously reported and therefore the estimated annualized Federal cost has decreased. Currently, the Department has two employees working on this program so this change is reflected in the previous calculation.

Estimated annualized Federal cost:

Program Personnel:

1 person @ $46/hr. x 60 hours	$2,760.00
1 person @ $29.00/hr. x 40 hours	$1,160.00

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

An adjustment has been made to the number of applications we expect to receive,increasing from 15 to 20, thereby increasing the current OMB inventory burden hours from 1,200 to 1,600.

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.

There is no plan for publication.

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 the Certification of Paperwork Reduction Act.

Items F & I were not applicable on the Certification for Paperwork Reduction Act Submission.