SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

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.

On February 17, 2009, President Barack Obama signed into law the American Recovery and Reinvestment Act of 2009 (ARRA), historic legislation designed to stimulate the economy, support job creation, and invest in critical sectors, including education. The ARRA lays the foundation for education reform by supporting investments in innovative strategies that are most likely to lead to improved results for students, long-term gains in school and school system capacity, and increased productivity and effectiveness.

The ARRA provided $200 million for the Teacher Incentive Fund (TIF) and the FY 2010 regular appropriation provided another $400 million. The Department used approximately $144 million from the program's ARRA appropriation and $304 million from the FY 2010 appropriation to make new awards. This competitive grant program is designed to support projects that develop and implement performance-based compensation systems (PBCS) for teachers, principals, and other personnel in order to increase educator effectiveness and student achievement in high-need schools.

The ARRA requires the Department's Institute of Education Sciences (IES) to conduct a rigorous national evaluation, utilizing randomized controlled methodology to the extent feasible, to assess the impact that PBCSs for teachers and principals have on teacher and principal recruitment and retention in high-need schools and subjects.

The Department received approval for an emergency clearance of an application package for the Teacher Incentive Fund. This emergency clearance ends on November 30, 2010. The Department is requesting a three-year clearance of this collection. The Department is not making any changes to the collection.

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 will be in the form of a single application submitted by State educational agencies (SEA), local educational agencies (LEA), charter schools with LEA status, or non-profits partnered with SEAs, LEAs, or charter schools.

The information will be used by applicants to propose a plan to implement PBCSs for teachers and principals to improve educator effectiveness and student achievement.

An applicant must submit to the Department an application that provides the following information:

- A coversheet including signatures of the authorized representative.
- Assurances (Accountability, Transparency, Reporting Assurances and Other Assurances and Certifications).
- Budget Summary Tables.
- A budget Narrative.
- Competition Priorities.
- An application Narrative.

The Department will use independent reviewers who have been chosen from a panel of pool of qualified educators with expertise in evaluation, teacher quality, data management and analysis, differentiated pay, educational policy, teaching and/or school leadership. All reviewers will be thoroughly screened for conflicts of interest to ensure a fair and competitive review process.

Under the current collection, the public comment period was waived. The application period began in May, 2010 and the Department held a grant review using independent reviewers, as described above.

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 eligible entities will submit applications electronically. An electronic document reduces costs of printing and makes the process of data collection more efficient.

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.

There is no duplication in the collection.

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 entities that may apply for the TIF program include small LEAs and nonprofit organizations applying for and receiving funds under this program in partnership with an LEA or SEA. Applicants will be required to apply electronically, which will help to reduce the burden. Additionally, the Department will monitor the application and review process to identify any areas where burden can be reduced for future competitions.

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 Teacher Incentive Fund grant application process would be that States, LEAs, charter schools with LEA status, and non-profits, partnered with States, LEAs, and charter schools would not be able to receive funds and the program would not be implemented. Furthermore, the evaluation required under ARRA could not be conducted.

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 tht it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

None of the special circumstances listed above apply. This collection is consistent with 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 purpose of this collection is to obtain a three-year clearance of the application package. The application previously received emergency clearance as it was an ARRA-related emergency clearance and there was an immediate need to make the application available.

This collection will be available for a 60-day public comment period followed by another 30-day comment period.

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

Respondents will not be provided any payments or gifts for data collection.

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

The Department is not requesting any confidential information, so no assurances of confidentiality are necessary.

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 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.**

The competitive application includes information collection activities for eligible applicants, which include States, LEAs, charter schools with LEA status, and non-profits partnered with States, LEAs, or charter schools. The Department anticipates that 120 entities will apply for the Teacher Incentive Fund Program and that the application activities will take 248 hours at a cost of $30/hour (approximately a GS-12 equivalent). As a result, the Department estimates the total annual hours at 29,760 at an annual cost of $892,800.

In determining the total burden hours and costs, the Department anticipates that it will hold one TIF discretionary competition per year for each of the next three years, which would be covered under this information collection. The Department anticipates 120 applicants under each competition and that applicants will spend 248 hours to apply. As a result, the Department anticipates applicants will spend a total of 89,280 hours at a total cost of $2,678,400 over the course of three years.

Applicant Estimates

TIF Activity	**Number of Applicants**	**Hours/ Activity**	**Hours**	**Cost/ Hour (GS-12)**	**Cost**
Complete Application	120	248	29,760	$30	$892,800
Total Burden Hours and Cost	**120 (per year)**	**248 (per applica**	**89,280 (three**	$30	**$2,678,400 (three year**

		nt)	**year total)**		**total)**

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 start-up costs for this collection.

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 screening the applications, managing the grant review, reviewing the budgets, and awarding Teacher Incentive Fund funds.

- Grade 9: 200 hours at $24.74/hour = $4,948
- Grade 13: 600 hours at $42.66/hour = $25,596
- Grade 14: 100 hours at $50.41/hour = $5,041

Additionally, the Department will use a Contractor for assistance with the peer review. The cost of the grant review is expected to be approximately $572,533. The total includes costs for meeting space for the review, contractual support, conference calls, printing, mailing expenses, computer and printer rental, and reviewer expenses (travel, lodging, and honoraria).

The Department will also use a contractor for planning workshops, estimated to cost approximately $50,000.

We expect the annual total cost to the Government to be: $658,118. The total cost to the Government over the course of three years is anticipated to be $1,974,354.

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

There are no changes to the estimated burden hours.

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.

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 the Certification of Paperwork Reduction Act.

There are no exceptions to the certification statement identified in the “Certification for Paperwork Reduction Act Submissions” Form.