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 is helping to 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 are providing comprehensive information on steps individuals can take to become a teacher. A major component of TEACH.gov is a job listings section which aggregates and lists 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. The job listing component was launched on September 27, 2010 under OMB control number 1855-0022, which was approved by OMB under the emergency clearance procedures 5 CFR 1320.13 on August 23, 2010.

   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 is 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 still 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. As of December 16, 2010, the Department has not entered into any partnership agreements with respect to the TEACH campaign.

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 committed to and delivered a full functioning Web site that was launched on September 27, 2010, at an official unveiling event that featured Secretary Duncan as a part of the MSNBC Education Nation event.

At the time that ED obtained emergency approval of this information request, we started the process of requesting a full three-year approval of this ICR, publishing the first PRA notice on August 11, 2010, requesting comments on both the emergency approval and a full three-year approval of the ICR.

Since launch of the TEACH.gov website jobs section, TEACH.gov has been very effective at achieving the objective of connecting job seekers with prospective employers and no other web site currently exists as comprehensive as TEACH.gov. This site is also the only one of its kind that aggregates information on teacher preparation programs and certification routes comprehensively in one place.

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.

This request is for a three-year extension of the existing 180-day clearance, OMB #1855-0022.

We will continue to 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 to 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 are offered to the job listing provider to collect these 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.

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 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.

At the launch of the jobs site, approximately 2,000 vacancies were posted on the site. There are now 6,158 vacancies posted, with the number expected to grow as the recruitment season gears up in the spring.

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.

   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.

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.

   We estimated that approximately 50 of the organizations providing job posting would be private or non-profit small businesses and 1,400 public sector small entities. Our experience to date is that four small businesses and other small entities and 10 public sector entities post vacancies on our site. We were able to find four teacher jobs-aggregators that post the majority of vacancies on the site to date. We are also working actively with the Council of Great City Schools and school districts directly to increase the number of public sector postings on the site.

   Please see our response to #3 above for the description of minimizing burden to these entities.

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.

   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.

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.

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

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 Department published the applicable 60 and 30-day Federal Register Notices and received one public comment which we address in a separate document.

The TEACH team has had conversations with representatives of the Chief State School Officers, the Council of Great City Schools, school districts, and commercial teacher job listing services to gauge interest in participating in this activity. Since launch, we have four commercial job banks, eight public school districts or charter schools, and one teacher residency program posting jobs on the site. It is the priority of the TEACH program in the coming months to increase that number exponentially. We are in the midst of a large scale effort to recruit the top 100 school districts in the country to post jobs on the TEACH.gov.

9. 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.

10. 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.

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.

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

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 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**

The burden estimates have not changed. Having been operational for only two months, we do not have enough data to suggest that the burden estimates have changed.

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

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**

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.

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**	

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

The $5,760 in start-up costs are shown as a change due to agency adjustment. These costs were first identified in the supporting statement in the previous emergency clearance, but were not identified as a cost burden in the ICR summary of burden.

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 are no plans to publish this data. The Job listing information collected, however, is 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 launched in September 2010 and will 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.

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

18. 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.