

MEMO

To: Josh Brammer
OMB Desk Officer

FROM: James Butler
Supervisor Education Program Specialist

SUBJECT: OMB83 C Request for Amendments to the Application for Initial Funding for the State Fiscal Stabilization Fund Program *under OMB Control Number 1810-0690*

The Department of Education (Department) is requesting to amend the Application for Initial Funding to include the following information:

- 1) In Section 14005(b)(2) of Division A of the American Recovery and Reinvestment Act of 2009 (ARRA), the State is required to provide baseline data that demonstrates the State's current status in each of the assurance areas.

These assurances were collected in the initial application while the baseline data was collected through a separate data collection (Application for Funding for Phase II of the Education Fund under the State Fiscal Stabilization Fund Program). The Department is requesting to amend the initial application to collect the revised data as outline in FR Volume 74, Number 217, page 58435through 58525 .

- 2) In Section 14005(b)(3) of ARRA, the State is required to describe how the State intends to use it allocation, including whether the State will use such allocation to meet maintenance of effort (MOE) requirements under the ESEA and IDEA and, in such cases, what amount will be used to meet such requirements.

In the original application, States generally described how it intended to use its allocation by providing information on the amount of SFSEF funds provided to institutions of higher education and local educational agencies. Complete information could not be collected at the time of the application because definitive guidance on the use of SFSEF dollars to meet MOE for other programs was unavailable during the release of the initial application; the Department has now issued this guidance and States have begun to collect this information based on the issued guidance. Second, this specific request may have considerably slowed down the awarding process for these funds because the data may not have been readily available at the time.

- 3) In Part 5, Section A of the initial application, the Department indicated that it will collect Fiscal Year (FY) 2011 at a later date.

FY 2011 data was not available to States when the application for initial funding was made available. The majority of the States now have FY 2011 data and are ready to submit revisions to their initial applications to reflect FY 2009, 2010 and 2011.

These amendments will change the burden hours from an estimated 17 hours, 20 minutes per application, for 894 total burden hours to 37 hours, 12 minutes per application, for a total of 1,934 burden hours and 24 minutes.

A. Burden hours for respondents

The Department estimates that approximately 52 applicants (State governors) will amend their Phase I application. The average burden for the application is estimated to be 37 hours, 12 minutes per application, for 1,934 burden hours total. This is not a new collection; it is an amendment to the approved Phase I application. An 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, adjustments are italicized:

Part	Time burden	Basis for calculation
Part 1	6 minutes	Time taken to fill out form with readily available information
Part 2, Sec A	<i>0 minutes</i>	Time taken to read and sign the assurance-Information already on file (No Further Action Necessary)
Part 2, Sec A	<i>30 hours</i>	Time to update the progress for each of the 47 indicators or descriptors and provide any new URLs or State Plans if necessary. States should provide updates when there are changes to their approved Phase 2 application. The Department anticipates changes to 20 of the 47 indicators or descriptors.
Part 3	<i>0 minutes</i>	Time taken to read and sign the assurance-Information already on file (No Further Action Necessary)
Part 4, Section A	3 minutes	Time taken to read and sign the assurance
Part 4, Section B	2 minute	Time taken to read and sign the assurance
Part 4, Section C	<i>1 hours</i>	Time taken to research, discuss, and provide or estimate budget support information, and to describe budget data sources.
Part 5, Section A	<i>3 hours</i>	Time taken to research, discuss, and provide or estimate budget support information, and to describe budget data sources.

Part 5, Section B	<i>2 hours</i>	Time taken to research, discuss, and provide or estimate budget support information.
Part 5, Section C	<i>1 Hour</i>	Time taken to research, discuss, and provide the amount of SFSF dollars used to meet Title I or IDEA MOE requirements.
Part 6	<i>0 minutes</i>	Time taken to read and sign the assurance-Information already on file (No Further Action Necessary)
Part 7	<i>0 minutes</i>	Time taken to read and sign the assurance-Information already on file (No Further Action Necessary)
Total burden	37 hours, 12 minutes	

These updated burden hours are minimal (as compared to the Phase 2 collection) States should use this application to update their approved Phase 1 and 2 applications.

If you have any questions, please contact Jimmy Yun (Jimmy.Yun@ed.gov) or 202-205-4012.