

STRIVING READERS COMPREHENSIVE LITERACY GRANT PROGRAM

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

INTRODUCTION

The Striving Readers Comprehensive Literacy (SRCL) program is authorized as part of the FY 2010 Consolidated Appropriations Act (Pub. L. No. 111-117) under the Title I demonstration authority (Part E, Section 1502 of the Elementary and Secondary Education Act (ESEA)). The FY 2010 Appropriations Act provides \$200 million under Section 1502 of the ESEA for a comprehensive literacy development and education program to advance literacy skills for students, including limited-English-proficient students and students with disabilities, from birth through grade 12. Literacy skills include pre-literacy skills, reading and writing. This statute contains both formula and discretionary provisions. The formula grant will assist states in writing State Literacy Plans and the discretionary grant's eligible recipients are State Education Agencies who in turn will conduct competitions giving priority to local educational agencies (LEAs), or agencies or other entities serving greater numbers or percentages of disadvantaged children when holding their State competitions.

SRCL is a discretionary grant program with \$178 million in funding for competitive awards to the States, to make competitive awards to LEAs or, in the case of early literacy, to LEAs or other nonprofit providers of early childhood-education that partner with a public or private nonprofit organization or agency. Sub-grants must be allocated as follows: (1) at least 15 percent to serve children from birth through age five, (2) 40 percent to serve students in kindergarten through grade five, and (3) 40 percent to serve students in grade six through grade 12, including an equitable distribution of funds between middle and high schools. The program allows funds to be spent on services and activities that have the characteristics of effective literacy instruction through professional development, screening and assessment, targeted interventions for students reading below grade level and other research-based methods of improving classroom instruction and practice.

SRCL is a new discretionary grant and the data collection requirements are in draft form.

A. JUSTIFICATION

1. Explain the circumstances making the collection of information necessary.

The Striving Readers Comprehensive Literacy program authorized as part of the FY 2010 Consolidated Appropriations Act (Pub. L. No. 111-117) under the Title I demonstration authority (Part E, Section 1502 of the Elementary and Secondary Education Act (ESEA)), requires each

applicant to develop an application package including an accountability plan that outlines the State's goals and objectives designed to measure the impact of the funded activities. State applications must include measurable objectives to increase student literacy determined using State assessments measuring student achievement. The FY 2010 Appropriations Act provides \$200 million under Section 1502 of the ESEA for a comprehensive literacy development and education program to advance literacy skills for students from birth through grade 12 including pre-literacy skills, reading and writing, including limited-English-proficient students and students with disabilities. Of the \$200 million \$178 million in funding is reserved for competitive awards to the States, to make competitive awards to LEAs or, in the case of early literacy, to local education agencies or other nonprofit providers of early childhood-education that partner with a public or private nonprofit organization or agency. Applicants will report data in their application to ED on limited-English proficient students, disadvantaged children and students with disabilities.

The data reported in the State's application to ED is designed to aid grant application reviewers to analyze the need for the project, assess the quality of the project design and services based on the states proposed outlined plan and evaluate the quality of the proposed project evaluation. By structuring the application so all States are required to provide standardized data, the reviewers and program office staff are better able to make informed decisions across all submitted applications.

ED would not be able to obligate funds appropriated by Congress without this information collection.

1a. Identify any legal or administrative requirements that necessitate the collection.

The FY 2010 Consolidated Appropriations Act (Pub. L. No. 111-117) under the Title I demonstration authority (Part E, Section 1502 of the Elementary and Secondary Education Act (ESEA)) requires "...a comprehensive literacy development and education program to advance literacy skills, including pre-literacy skills, reading, and writing for students from birth through grade 12, including limited-English-proficient students and students with disabilities" and "disadvantaged children". The statute further requires that "State leadership activities" include "data collection" and "reporting". The statutory language can be found in the Appendices A.

1b. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

See Appendices A.

2. Indicate how, by whom, and for what purpose the information is to be used.

The data provided through this information collection will be used by application reviewers to assess the applicant's need for the project, the quality of the project design and proposed services, the project management, adequacy of resources and the quality of the proposed project evaluation.

In addition, ED will use the information provided in this information collection to prepare summaries of the activities each grantee will carry out that will be disseminated by ED to members of Congress and the general public; and to monitor the progress and performance of each grantee in carrying out the activities described in the application.

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 adoption this means of collection. Also describe any consideration of using information technology to reduce burden.

All applicants will use Grants.gov, an Internet-based collection system, to submit their applications electronically to the Department.

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 SRCL application does not duplicate any other information collection effort.

5. If the collection of information impacts small businesses or other small entities (Item 8B of IC Data part 2), describe any method used to minimize burden.

This collection of information does not impact small businesses. Small entities are not affected by this collection since applicants are SEAs.

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 SRCL program is a discretionary grant program. The program could not be implemented without the collection of information. Not obtaining this data in the State's application would

leave reviewers without the information required to determine if a State's application fulfills the statutory requirements of the grant application. The data collection occurs only when applications for new grants are solicited, no more than once a year.

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 that can be generalized to the universe of study;
- Requirement the use of the 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 unnecessary 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.

None of the special circumstances listed apply to this data collection.

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 CFT 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.

ED will publish a 30-day notice for public comments in the Federal Register.

ED convened two Public and Expert Input Meetings, November 19, 2010, for those non-profit, for-profit and associations outside the agency to obtain their views and interests in the SRCL program. The purpose of these meetings was to provide technical assistance to all interested parties and possible SRCL SEA applicants on effective literacy instruction for children and youth, birth through grade 12, relating to a variety of priorities, including increasing the achievement of English learners and students with disabilities. Presentations by literacy experts, State and local educational agencies, and a comment period took place during the two Public and Expert Input Meetings. All presentations, written comments, as well as the transcript from the meeting have been posted to our website at <http://www2.ed.gov/programs/strivingreaders-literacy/index.html>.

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

No payment or gifts to respondents will be made.

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

There is no assurance of confidentiality.

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. This 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.

Due to this being a new program the program office has not discussed with outside organizations the availability of data, frequency of collection, the clarity of instruction and record keeping, disclose, or reporting format and on the data elements to be recorded, disclosed or reported. The grants have not been awarded to SEAs making it impossible to consult with representative SEAs about from whom information is to be obtained or those who must compile records at least every three years.

All SRCL applicants will be asked to complete the SRCL grant application. We estimate that the application to take an average of **200** hours for a State Education Agency to complete. The average burden for completing the one-time grant application for the approximately **48** States is **9,600** hours. The cost to respondents is estimated to be **\$40** per hour for a total cost to respondents of approximately **\$384,000** for each application. The hour burden on respondents is not expected to vary as there is only one version of the Striving Readers Comprehensive Literacy 2011 Application.

- Approximately 48 respondents x 200 hours x \$40/hour = \$384,000.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no additional respondent costs associated with this data 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.

<i>Program Staff</i>	
1 GS15 x \$54 x 160 hours	\$8,640
1 GS13 x \$39/hour x 600 hours	\$23,400
2 GS9 x \$27/hour x 480 hours	\$25,920
TOTAL	\$57,920
<i>Application Review Costs</i>	
48 applications x 3 hours per application per reviewer = 144 hours	
Travel for reviewers/moderators (44 @ \$800)	\$35,200
Per diem for reviewers (44 @ \$282)	\$12,408
Honorarium for reviewers (35 @ \$1,000)	\$35,000
Honorarium for moderators (9@ \$1,500)	\$13,500
TOTAL	\$96,108
GRAND TOTAL	\$154,028

There are no costs for printing or mailing the application package. The application package will be available through Grants.Gov and the Department's website.

The annualized cost to the federal government is estimated to be **\$154,028.00**.

The cost estimate was determined using the following:

One full-time GS 13 staff member is projected to work on this effort for fifteen weeks. Two half-time GS 9 staff members are expected to work on this effort for twelve weeks and our group leader, a GS 15, is expected to work on this effort for two weeks. A week is based on a forty hour work week. Over the next few weeks the staff members are expected to work 1,720 hours preparing for and administering the discretionary grant

competition. The hourly wage used to figure the total labor costs for the Department of Education was based on the GS wage rate schedule as stated in the chart above. The application review costs were determined using 2010 data from previous Academic Improvement and Teacher Quality Program competitions.

15. Explain the reasons for any program changes or adjustments reported in Item 16 of IC Data Part 1.

This request is for a new grant program. No changes or adjustments are requested.

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 formally publish the results of the data provided in the grant applications. Rather, the data obtained through this data collection will be used by the program office for a SRCL discretionary grant competition.

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.

All data collection instruments will include the OMB expiration date.

18. Explain each exception to the certification statement identified in the “Certification for Paperwork Reduction Act Submissions” Form.

No exceptions are requested.

