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.

The ED 524 form and instructions are included in U.S. Department of Education (ED) discretionary grant application packages and are needed in order for applicants to submit summary-level budget data by budget category, as well as a detailed budget narrative, to request and justify their proposed grant budgets as part of their grant applications. At the time of application, ED applicants submit budget information on the ED 524 for both Federal funds requested and for the non-Federal match or cost-sharing funds they are committing to the proposed project (either statutorily required or provided as a voluntary commitment) for each budget period of a multi-year project. Please note that Education Department General Administrative Regulations (EDGAR),(34 CFR 75.117) requires that an applicant that proposes a multi-year project must include in its application a budget narrative accompanied by a budget form prescribed by the Secretary, that provides budget information for each budget period of the proposed project period. In order to prepare the non-Federal portion of the budget for the ED 524, the applicant must already have had this information on hand in their internal grant accounting records. Under EDGAR, 34 CFR 74.23 and 80.24, as applicable, a grantee is required to maintain this information regarding cost-sharing and matching resources.

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 ED 524 collection establishes uniform categories of cost and a standard format for requesting costs for all budget periods of a multi-year project. ED applicants that are applying for multi-year projects, submit a budget for all years of the grant's proposed project period (typically 3 to 5 years), with their initial grant applications (EDGAR, 34 CFR 75.117). ED uses this information to evaluate the reasonableness, allowability, and allocability of funds that the applicant requests to support ED-sponsored grant projects (EDGAR, 34 CFR 75.232). The applicant is required to submit a separate ED 524 for each application it submits to the Department.

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 Department continues to take part in the P.L.106-107 electronic government task forces and participates as a full partner in E-Gov/Grants.gov. The Department has increased its participation and the building and posting of grant application packages in the Grants.gov Web Portal. As of FY 2007, 100% of ED's discretionary grant competitions were available in Grants.gov and all ED discretionary grant competitions that were able to, participated in Grants.gov APPLY.

Please note that ED is an active participant in interagency efforts to streamline grant application forms and to create standard data elements that will be used by applicants and grantees in Grants.gov. In addition, over the last three years ED has made a concerted effort to move as many programs as possible that were previously using a program-specific budget form opposed to using the ED 524.

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.

Consistent with EDGAR requirements found in 34 CFR 75.117, the applicant submits the Budget Information Non-Construction form, ED 524, along with the grant proposal to describe the proposed budget layout to run a particular project. This information is unique to each project, which is specifically designed for a particular program competition, and thus is not available anywhere else.

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.

Under EDGAR regulations, all requirements for small entities are minimized

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.

Failure to collect the budget information on the Budget Information Non-Construction Programs form, ED 524, from each applicant would make it nearly impossible for the Department to make a fair and accurate assessment of the reasonableness, allowability, and allocability of the applicant's request for Federal funds and to provide a level of funding that could be justified.

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.

The information will not be collected in a manner inconsistent with the general information collection guidelines.

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 both a 60 and 30-day Federal Register Notice, there was no public comments.

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

There are no payments or gifts to respondents other than the allocation of federal funds that result from the information collection.

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

There are no assurances 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. 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 does not include information 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.

<u>Total Annual Burden Hour Calculation for Budget Information Form, ED 524</u>: Total annual burden hours for ED 524: 330,750

Approximately 18,900 respondents are estimated to submit a proposed budget with their grant applications in each of the next three fiscal years covered by this collection (based on 18,883 applications submitted in FY 2010). The total annual hour burden estimate for each of the next three fiscal years (i.e., FY 2011, 2012, 2013) is 330,750. The burden hour per response is estimated to average 17.5 hours.

17.5 hours/response (average) X 18,900 responses/year = 330,750 total annual burden hours

<u>Estimated Total Annualized Cost to Respondents for completing and submitting the ED 524:</u> $8,268,750

17.5 hours/response (average) X 18,900/year X $25/hour = $8,268,750

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

No start-up costs.

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.

Total Annual Cost to the Federal Government for Budget Information form, ED FORM 524: $1,559,628

The total annual cost is based on the following:

2 hours per response x 18,900 responses x $41.26/per hour (average DC-area GS-12 hourly rate) = $1,559,628

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

Due to an increase in discretionary grant applications received by the department, there is an adjustment of an increase in burden hours of 33,250.

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.

No plans exist to publish the results of this information collection.

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.

We are not seeking approval to not display the expiration date for this information collection.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

There are no exceptions to the certification statement.