

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification -1894-0004

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.

Many discretionary grant programs in the Department of Education (ED) use the generic application package (OMB #1894-0006) which allows programs to pick and choose the selection criteria for their grant competitions from among the Education Department General Administrative Regulations (EDGAR) selection criteria shown at 34 CFR 75.210.

The remaining of the discretionary grant programs use program-specific application packages, cleared by OMB on a case-by-case basis, that require applicants to address specific selection criteria unique to the program, usually derived from program legislation or regulation. During the three-year period for which its specific application package is cleared, a program might need to substitute one or more of the EDGAR generic selection criteria, mentioned above, for one or more of the program-specific criteria contained in the package originally cleared by OMB.

These substitutions generally result in minor alteration in the burden hours imposed by the collection. But, having to re-clear an already approved application package for such actions would be unnecessarily time-consuming and counter-productive to the goal of administering application competitions in a timely and efficient manner.

This information clearance action seeks renewal of approval for an established expedited process to permit programs to make these criteria substitutions without having to submit a previously cleared application package for another review. It establishes a process for programs to submit an abbreviated list of items (see below) for an expedited 10-day review/approval process by OMB, without the need for a public comment period.

Although the process is used only used on an infrequent basis, it is an important tool for programs to have at hand for administering their grant competitions, should the need arise.

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.

Used in grant competitions, selection criteria are at the core of the application narrative, requiring applicants to provide the key information on the basis of which the Department is able to make funding decisions. The information submitted in response to the selection criteria is used by ED program officials and their reviewers to evaluate the merit of applications.

Although this substitution process is used only on an occasional basis, programs that choose to change one or more of their program-specific criteria to EDGAR general criteria are able to respond to changes in program goals or emphasis as a result of regulatory or legislative changes, changes in administration or departmental policy, shifting needs of the constituency served, etc.

Under this expedited process, the public comment period is eliminated and OMB reviews each request within 10 days. [If there are any other changes to the approved application being sought or if the application package is close to its expiration date, the program office must go through the streamlined (60 day) OMB clearance process for discretionary grant application packages, which includes one public comment period].

When submitting the request for expedited review for substituting EDGAR selection criteria, program offices must include a memorandum, addressed to the OMB Desk Officer, stating:

- the title, the OMB control number, and the expiration date of the approved application package;
- the OMB control number (1894-0004) for this streamlined process;
- the type of criteria change (indicating the program-specific criteria to be replaced and the text of the EDGAR general selection criteria to be substituted); and
- the requested approval date.

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.

Program Offices are building information collections in electronic format and more than 75% of submissions are electronic.

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. Each grant application competition is unique and there is no other way to collect this information than through the criteria announced to the public.

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.

The regulation does not affect small businesses or other small 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.

Not collecting this information via the selection criteria would eliminate the ability of the program staff and the reviewers to make an accurate assessment of an application's funding merit.

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.

There are no special circumstances.

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 appropriate 60-Day and 30-Day Federal Register Notices for Public review and comment were published with no public comment(s).

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

The selection criteria will be used to select applications for funding. All selections are made on a competitive basis. There is no promise of payment to those submitting applications to be evaluated under these criteria.

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

No confidential information is collected. 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.

No information of a sensitive nature is collected.

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 total annual cost burden to respondents will be described by each program using these criteria. Current OMB inventory is reported as a placeholder burden of 1 hour.

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 to respondents.

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 annualized cost to the Federal Government will be described in each application package using these criteria. There is no specific annualized cost to the Federal Government resulting from these regulations.

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

This information collection clearance request seeks an extension of approval for an established expedited process permitting the Departments program offices to make selection criteria substitutions under the EDGAR grant application without having to submit to OMB a previously cleared application package for another review. There are no program changes or adjustments.

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 information.

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 application packages using this expedited process will display the originally assigned OMB expiration date for the application package when it was cleared.

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 of Paperwork Reduction Act.