

**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.

This is a request for emergency clearance to collect basic, time critical information about scholarship applicants for the DC School Choice Incentive Program, and preliminary information for the evaluation. The Program was recently reauthorized on April 15, 2011 through "District of Columbia, Federal Funds, Federal Payment for School Improvement". Speaker Boehner introduced the Scholarships for Opportunity and Results (SOAR) Act which reauthorized the DC School Choice Incentive Program for another five years beginning in FY 2011. Pursuant to 5 CFR 1320.13, the Department requests that OMB review the DC School Choice Incentive data collection tool under its emergency procedures. The request for an emergency clearance is twofold: (1) public harm is likely to result as more than 1,150 students on the current waiting list must be selected and approved to receive funding by the end of June, a process that requires approximately eight weeks to complete; and (2) receiving funding was an unanticipated event as funding for this program was previously discontinued.

Due to the urgency associated with distributing the scholarship form and collecting information from interested participants, we are requesting an emergency clearance by Thursday, May 5. Please note that the prior clearance for this program expired earlier this year and was not renewed because in FY 2009, language was passed in an omnibus spending bill prohibiting any new students from receiving scholarships unless the program was fully reauthorized by Congress.

The DC School Choice Incentive Program, authorized by the Consolidated Appropriations Act of 2004, awarded a grant to the D.C. Children and Youth Investment Trust Corporation that will administer scholarships to students who reside in the District of Columbia and come from households whose incomes do not exceed 185% of the poverty line. Priority is given to students who are currently attending schools in need of improvement, as defined by Title I. To assist in the student selection and assignment process,

the information to be collected will be used to determine the eligibility of those students who are interested in the available scholarships. Also, since the authorizing statute requires an evaluation we are proposing to collect certain family demographic information because they are important predictors of school success. Finally, we are asking to collect information about parental participation and satisfaction because these are key topics that the statute requires the evaluation to address.

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 collection will be used to collect basic information about applicants for DC School Choice Incentive scholarships and preliminary information for the evaluation. Failure to collect this information will hinder the grantee's ability to select students for the scholarships, administer the student lottery, identify the number of slots available in participating schools, to effectively manage the distribution of scholarships to low-income parents of students, and to meet certain evaluation and reporting requirements, as required by the statute. In turn, this will negatively impact the entire program by risking fair and equitable access to the expanded educational options for low-income parents in the District of Columbia.

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.

Since responses will be submitted in hard copy, the collection of information does not involve the use of automated, electronic, or mechanical forms of information technology.

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.

We have made the determination that a duplication of effort does not exist, since the respondents are unique to this narrowly tailored grant program. To the best of our knowledge, there is no other information collection that is available to fulfill this request.

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.

There is no anticipated impact on small business or other small.

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 statute requires that the grantee conduct an extensive public education campaign, in which parents' apply for scholarships, and that the grantee identifies participating schools, administers a student lottery, and, conducts the student selection and assignment process. Additionally, the grantee will participate in evaluating programmatic activities.

The negative consequences of not performing the information collection requested could be detrimental to the notification to parents about the expanded options, filling the available slots in participating schools, distribution of student scholarships, and overall nullify the management, evaluation and administration of the grant program.

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.

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.

An emergency 60-day Federal Register Notice was published on April 29, 2011.

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

There is no payment or gift to respondents, other than remuneration of contractors or grantees (upon the completion of the grant competition and award of the contract for the evaluation of the program).

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

In accordance with the Privacy Act of 1974, as amended (Privacy Act), the Department published a System of Records Notice in Volume 69, page 22015 on 4/23/2004 entitled DC Choice Program Evaluation (18-13-07). The system

contains information about program applicants (students), their parents, and other adults living with the applicants. It includes names, addresses, telephone numbers, social security numbers, and demographic information—such as race/ethnicity, age, marital status, disability, language spoken in the home, education background, and income.

On the proposed application form, the following information will be included: The information you provide will be maintained by the evaluator and shared only with the organization that is selected by the grantee to verify income information and with the organization selected by the U.S. Department of Education to conduct the evaluation of this program. Any information you provide herein will not be shared with any other third party not affiliated with the grantee or contractor organization.

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.

The information collection does not include questions of a sensitive nature such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

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.

Collection	Number of Respondents	Frequency	Number of Responses	Average Hours	Total
Information	3,000	1	3,000	.20 (20 min)	1,000

The annual number of responses for this collection total 3,000. The average number of hours/responses is 30 minutes, which results in a total of 1,000 annual burden hours.

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

The costs are minimal, because the program will be administered by the grantee.

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.

Work Estimate	Number of Employees	Pay Rate	Cost per Hour	Average # of Hours	Total
Analysis and processing	1	GS-13	\$41.00	10	\$410.00

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

This is a program change due to the programs recent reauthorization on April 15, 2011 through "District of Columbia, Federal Funds, Federal Payment for School Improvement". The Department is requesting a reinstatement with change of a previously approved collection, burden does not increase or decrease from current OMB inventory of 1,000 annual burden hours as the estimated number of respondents and total hours associated with annual reporting have not changed.

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.

The results of the information collection will not be published.

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 this approval.

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

We are not requesting any exceptions to the “Certification for Paperwork Reduction Act Submissions”.

B. Collection of Information Employing Statistical Methods

Statistical methods will not be used to reduce burden or improve accuracy of results.