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 American Recovery and Reinvestment Act of 2009 (ARRA) provided $4.3 billion for the Race to the Top Fund (referred to in the statute as the State Incentive Grant Fund), of which approximately $4 billion was used to fund comprehensive statewide reform grants under the Race to the Top program. The U.S. Department of Education (Department) awarded Race to the Top grants in two phases. On March 29, 2010, at the conclusion of Phase 1, the Department announced Race to the Top grants for two states. Delaware and Tennessee received their grant awards on June 14 and July 28 respectively. On August 24, 2010, at the conclusion of Phase 2, the Department announced Race to the Top grants to an additional 9 states and the District of Columbia. All Phase 2 grants were awarded on September 24, 2010. The Department is committed to supporting grantees as they implement ambitious reform agendas through Race to the Top. Specifically, the Implementation and Support Unit (ISU) at the Department is dedicated to differentiating its approach based on individual State needs and supporting States to work with each other and with experts from around the nation to achieve and sustain educational reforms.

In order to fulfill our responsibilities for programmatic oversight and public reporting, the Department has developed a Race to the Top Annual Performance Report that is tied directly to the Race to the Top selection criteria and priorities previously established and published in the Federal Register. The report is grounded in the key performance targets included in grantees' approved Race to the Top plans. Grantees will be required to report on their progress in the four reform areas (standards and assessments, data systems to support instruction, great teachers and leaders, and turning around the lowest-achieving schools) and in Science, Technology, Engineering, and Mathematics (STEM). This reporting includes narrative sections on progress and key performance indicators. As was the case in the completion of the Race to the Top applications, grantees will coordinate with LEAs to collect and report on school and district-level data elements.

Each grantee State will submit a Race to the Top Annual Performance Report on an annual basis. The first report will be due to the Department by July 2011. This report will cover the period from the State's receipt of Race to the Top funds through June 30, 2011. States will submit the narrative elements and quantitative measures via an online data collection platform to be developed by a contractor.

Grantee responses will provide the information required for the Department to robustly fulfill our programmatic and fiscal oversight responsibilities. We have created a comprehensive monitoring (programmatic review and evaluation) protocol that utilizes data from the Race to the Top Annual Performance Report. In particular, the data informs a stocktake (meeting) with Race to the Top leadership that permits an assessment of grantee progress and allows the Department to pinpoint areas requiring technical assistance. We will also incorporate the data from monitoring and the Annual Performance Report into State-specific and comprehensive reports that will inform the public and Congress about Race to the Top.

These questions relate to the grant administration/performance and are covered by the ARRA and Education Department General Administrative Regulations (EDGAR) provisions. Section 14008 of the ARRA requires the Department to collect state reports annually in a reasonable manner as determined by the Department. Additionally, 34 CFR 80.20 requires that a State must account for grant funds in accordance with State laws and procedures. It also requires that a State's fiscal control and accounting procedures, as well those of its subgrantees and contractors, must, among other things, be sufficient to permit the tracing of expenditures of funds to a level that ensures that funds have not been used in violation of applicable Federal requirements. Similarly 34 CFR 80.40 requires that grantees are responsible for managing the day-to-day activities of grants and subgrants to assure compliance with Federal requirements and that performance goals are being achieved. The Race to the Top application asked grantees to create annual targets for performance measures and noted that additional measures might be added in the future.

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 information collected will be in the form of an annual report on progress and key performance indicators.

This is a new collection. States will submit the narrative elements and quantitative measures via an online data collection platform. These elements and measures are based on the information provided by grantees in their approved Race to the Top plans and program priorities. The baseline information for the performance measures and the performance targets will be prepopulated into the data collection platform based upon information provided in the state Race to the Top applications. We will use the data collected as part of the comprehensive monitoring (programmatic review and evaluation), to provide technical assistance that will assist grantees in meeting their ambitious reform goals, and to inform the public and Congress about Race to the Top grantees' progress.

The Department will, with the assistance of a contractor, evaluate the information in each report and use the data to prepare for the Congress the Secretary's Report.

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 given to using technology to reduce burden.

The Department will enlist the services of a contractor to develop an electronic system to facilitate the collection of annual report data from States. The Race to the Top Annual Performance Report questions will be emailed to grantees and posted on the Department's website. The information gathered through this process is detailed in A2.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The assurances and information requested under this collection are unique to the Race to the Top program, and the Department has not collected them in the past. Even in the event of similar or comparable information for other programs in the past, the progress updates and performance measures are specific to the Race to the Top program and the information is specific to the present point in time. Therefore, any comparable information and assurances that were collected in the past would not satisfy the requirements for this program.

The Department has made every effort to reduce the burden on States in producing the information. We will compile student performance information, including ESEA data, NAEP data, and high school graduation rates, from the National Center for Education Statistics (NCES) Common Core of Data (CCD), the Consolidated State Performance Report (CSPR) and EDFacts. We will also receive the number of LEAs, schools, k-12 students, and students in poverty from the CCD. Additionally, we are coordinating with the School Improvement Grants (SIG) program to collect data elements related to the four school intervention models through EDFacts.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The eligible applicants for the Race to the Top program are state governors. No small businesses or entities will be directly impacted by this collection. In order to reduce the burden on local educational agencies (LEAs), the Department has made every effort to ensure that the required collection is absolutely necessary to meet the requirements of the program. Additionally, States and LEAs were informed through the application process of the need to collect data on the performance measures included in their approved Race to the Top plans. The Department has made every effort to ensure that the required collection is absolutely necessary to meet the requirements of the program.

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.

Race to the Top is the largest discretionary grant program ever administered by the Department, and continues to generate high public interest for the Department. This collection is critical to ensure the Department has the required information to inform performance management discussions with grantees in order to make any necessary adjustments to program implementation and support, as well as provide appropriate updates to the public on the progress of grantee's program implementation and effectiveness.

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 that 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.

This collection is consistent with 5 CFR 1320.5(d)(2).

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 public will have an opportunity to comment during the clearance period. However, the questions in the Annual Performance Report are closely tied to the Race to the Top selection criteria and absolute, competitive, and invitational priorities previously established through notice and comment rulemaking and published in the Federal Register, as well as the statutory criteria, so it is unlikely there will be significant public comment.

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

No payment or gift to respondents has been made.

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

There are no questions 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.

- 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 be included in Item 14.

A. Burden hours for respondents

The Department estimates that each grantee would spend 121 hours[1] of staff time to provide the information required in each annual report. This estimate is based on an average between the upper and lower levels of burden hours estimated per grantee to complete the annual report. The lower level estimate is 101 hours, which represents the time needed to report on the required performance measures. The upper level estimate applies to grantees who have provided optional performance measures; in that case, up to 39 additional hours will be needed to complete the report.

[1] This is a weighted average.

Grantees were permitted to include optional performance measures with annual targets as part of their Race to the Top applications as a voluntary means of providing additional information on implementation and outcomes, and several States chose to do so. Additionally, States may choose to add optional measures through the Department's grant amendment process. The time required to complete the annual report beyond the 101 hour estimate depends on the quantity and nature of the optional performance measures selected by the State, but we expect such reporting will require no more than 39 additional hours.

The total number of hours spent nationally completing the initial reports would be 1452 (121 hours per grantee x 12 grantees).

Element	Hours per grantee
A. State Success Factors	
(A)(1) Articulating State's education reform agenda and LEAs' participation in it	1
(A)(2) Building strong statewide capacity to implement, scale and sustain proposed plans	0
(A)(3) Demonstrating significant progress in raising achievement and closing gaps	1
B. Standards and Assessments	
(B)(1) Developing and adopting common standards	0
(B)(2) Developing and implementing common, high-quality assessments	3
(B)(3) Supporting the transition to enhanced standards and high-quality assessments	3*
C. Data Systems to Support Instruction	
(C)(1) Fully implementing a statewide longitudinal data system	1
(C)(2) Accessing and using State data	3*
(C)(3) Using data to improve instruction	3*
D. Great Teachers and Leaders	
(D)(1) Providing alternative pathways for aspiring teachers and principals	5
(D)(2) Improving teacher and principal effectiveness based on performance	18
(D)(3) Ensuring equitable distribution of effective teachers and principals	32
(D)(4) Reporting the effectiveness of teacher and principal preparation programs	10
(D)(5) Providing effective support to teachers and	3*

principals	
E. Turning Around the Lowest-Achieving Schools	
(E)(1) Intervening in the lowest-achieving schools and LEAs	3
(E)(2) Turning around the lowest- achieving schools	2
F. General	
(F)(1) Making education funding a priority	3
(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	3
(F)(3) Demonstrating other significant reform conditions	5
Absolute Priority	
Comprehensive approach to education reform	6
Competitive Priority	
Emphasis on Science, Technology, Engineering, and Math	6
Invitational Priorities	
Innovations for improving early learning outcomes	3*
Expansion and adaptation of Statewide Longitudinal Data Systems	3*
P-20 coordination, vertical, and horizontal alignment	3*
School-level conditions for reform, innovation, and learning	3*
Additional measures	
Additional optional performance measures	15*
Budget	
Summary and project-level budget tables	2
Total hours per grantee, excluding optional measures)	101
Total hours per grantee, including all optional measures	140

*Indicates that grantees only respond to the question related to this element if they elected to provide optional performance measures for this element in their approved Race to the Top plans.

B. Cost to respondents

The Department estimates that the per-hour cost for grantee and subgrantee employees will average $30 per person (approximately GS-12 equivalent) per hour for a total of $3630 per grantee.

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 acquiring and maintaining 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:	0
Total Annual Costs (O&M):	0
Total Annualized Costs Requested:	0

There is no start-up or annual costs (aside from salaries listed above) for this 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.

The Federal costs include drafting the report template; staff review of the submitted reports for completeness, working with the contractor on analyzing the data submitted by the grantees; conducting follow-up discussions with grantees, as necessary; and assisting in drafting the required report to Congress.

The contractor will provide an online system for Annual Performance Report submission; provide technical assistance, as needed, to grantees in using the system; conduct data quality reviews and work with grantees, as necessary; and conduct an analysis of this annual data. The contractor will also submit an annual analysis of the data reported through the APRs as well as the raw data. The contractor will also submit a comprehensive report at the end of the contract period.

Grade	**Hours**	**Cost**
9 (4)	80 hours @ $24.74/hour	$ 1,979.20
11 (4)	40 hours @ $29.93	$ 1,197.20
12 (2)	36 hours@ $35.88/hour	$ 1,291.68
14 (1)	24 hours @$50.86	$ 1,220.64
15(1)	12 hours @$61.76	$ 741.12
Contractor assistance		$122,500
TOTAL COST		$128,929.84

15. Explain the reasons for any program changes or adjustments.

This is a new collection related to the Race to the Top program. There is a program change of 1,452 burden hours and 12 responses occurring due to the Annual Peformance Report for this program authorized by PL 111-5, Sec. 14008 (American Recovery and Reinvestment Act of 2009).

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 Department will report the information to Congress within 6 months of the deadline for the submission of State reports to the Department. Some of the information collected in this Annual Performance Report may be analyzed with monitoring (program review) data, ARRA reporting, and other Department data sources, and shared on a government website such as recovery.gov or ed.gov.

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.

The expiration date will be displayed on the form.

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

There are no exceptions.