

**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 a 3-year 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.

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 entities (as stated in Item 5 of OMB For 83-1).

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 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 Department published a 60-day FRN during the emergency clearance of 1855-0015 and received three-public comments. Below is the Departments summary of comments with comments and responses also attached. A 30-day FRN was published in September 2011.

Comment: Three commenter's expressed concern that the Department's proposed data collection will not capture all the information necessary to implement the program, ensure compliance with accountability requirements, and conduct a meaningful evaluation. One commenter recommended that the Department collect additional information about the students who apply to and enroll in the program. Other commenter's urged the Department to collect additional data on the English language learner (ELL) students who participate in the program and the services and program available for them; and, the number of students who drop out of the program. Commenter's also suggested that the Department compare graduation rates for the students who participate in the program with those in DC public schools and collect data and other information about schools participating in the program.

Discussion: We agree that rigorous data collection is a key aspect of this program and that all schools that participate in this program need to be held accountable for all students to receive a high-quality and equitable education. This proposed data collection instrument collects information about the students who apply to enroll in the program. ED will collect further information about students who participate in the program after scholarships have been awarded, e.g., through information collected from schools during the course of the students participation in the program and in the context of the evaluation. The combination of these data collection efforts is expected to collect the information the commenter's suggest, including (1) the numbers of students applying, awarded scholarships, enrolling in the program, and continuing in/leaving the program each year, disaggregated by

various student characteristics such as grade, gender, IEP status and language; (2) the types of schools participating students choose to attend including their religious affiliation; and (3) the outcomes specified in the statute, such as achievement and high school graduation. At this time, the design and plan for the evaluation required by the statute is in development so further detail about any data collection instruments developed for the evaluation is not currently available. The opportunity for the public to comment on any further information collection will be announced separately in the *Federal Register*.

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.

Based upon the assurance in statute, regulation, or agency policy for discretionary grant programs, the Department's disclosure policies adheres to the provisions under the Privacy Act. A SORN was published in vol. 69 no. 79 page 22014 on 4/23/2004.

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.

| <b>Collection</b>  | <b>Number of Respondents</b> | <b>Frequency</b> | <b>Number of Responses</b> | <b>Average Hours</b> | <b>Total</b> |
|--------------------|------------------------------|------------------|----------------------------|----------------------|--------------|
| <b>Information</b> | <b>3,000</b>                 | <b>1</b>         | <b>3,000</b>               | <b>.33(20 min)</b>   | <b>990</b>   |

The annual number of responses for this collection is 3,000, with 3,000 respondents taking 20 minutes to complete, for a total of 990 annual burden hours. The Department is maintaining the current OMB inventory of 1,000 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.

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

Costs to the Federal Government have been assessed at one employee at a GS13 hourly rate of \$41.00 taking an average of 10 hours to complete, for a total of \$410.00.

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

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.

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" of OMB Form 83-1.

## **B. Collection of Information Employing Statistical Methods**

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