

**Supporting Statement for Paperwork Reduction Act
Submissions
Consolidated State Application (Collection 1810-0576)**

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.

Title IX, Part C, Sections 9301-9306, of the Elementary and Secondary Education Act (ESEA), as amended, authorizes the Secretary of Education to provide States the option of submitting consolidated applications to obtain funds for covered programs in which the State participates. The purpose of consolidated applications as defined in ESEA is to improve teaching and learning by encouraging greater cross-program coordination, planning, and service delivery; to enhance program integration; and to provide greater flexibility and less burden for State educational agencies.

The programs covered by Title IX, Part C are –

Title I, Part A -----Improving Basic Programs Operated by Local Educational Agencies
Title I, Part B, subpart 3 -----William J. Goodling Even Start Family Literacy Programs
Title I, Part C -----Education of Migrant Children
Title I, Part D -----Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk
Title I, Part F -----Comprehensive School Reform
Title II, Part A -----Teacher and Principal Training and Recruiting Fund
Title II, Part D -----Enhancing Education Through Technology.
Title III, Part A -----English Language Acquisition, Language Enhancement, and Academic Achievement
Title IV, Part A ----- Safe and Drug-Free Schools and Communities
Title IV, Part B -----21st Century Community Learning Centers
Title V, Part A -----Innovative Programs
Title VI, Part B, subpart 2: ---Rural and Low-Income School Program.
Title VI, Section 6111-----State Assessments Program
Title VI, Section 6112-----Enhanced Assessment Instruments

This submission seeks OMB approval for an extension of the Consolidated State Application which is scheduled to expire October 2011. The original package was approved by OMB on May 7, 2002,

through an emergency processing with the final requirements. Since the initial approval of this collection, the U.S. Department of Education (ED) has requested and has been granted OMB approval on several amendments which are inclusive of this package. The Consolidated State Application will continue to be the tool used for states to apply for program funds. States will not be required to submit individual program applications for the programs they elect to participate in under the consolidated application until further determinations from reauthorization of the Elementary and Secondary Act (ESEA), as amended.

The Department of Education is seeking an extension of information collection request through FY 2014 or until ESEA is reauthorized. While the entire Consolidated Application is submitted for extended clearance, All States have submitted initial an application related to each of the current requirements of ESEA contained in this collection. ED will not require any State to complete and submit an entire Consolidated Application. However, since the Consolidated State Application is the basis for ongoing review of State performance, as States modify their respective program goals, performance targets and strategies, they are required to submit amendments to their existing application in accordance with EDGAR section 76.140 through 76.142.

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 Department will use the information from the consolidated State application as the basis for approving funding under the covered ESEA, as amended programs (in which the State participates). The Department also will use the performance targets, baseline data, and other related information in the consolidated application to continue to assess the degree of progress States make over time in achieving ESEA goals. As with previous collections, the information in this collection will allow the Department to continue to monitor effectiveness of the use of program funds, and provide grantees with technical assistance.

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.

This information collection will make the application package available to States in an electronic format. Where applicable, States may include html

references, electronic files, or other existing documentation to comply with the requirements listed in the application.

This information collection will be the last Consolidated State Application under the current ESEA authorization. ED is currently working with PIMSI/EDFACTS to build application requirements in their system to prepare for the reauthorization of ESEA.

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 consolidated application collection is based on an effort to avoid duplication. If States submit consolidated applications, they will not be required to submit individual program applications for the programs covered in the consolidated application. Secondly, the Department plans to consult with States and local education technology experts in data collection to ensure (among other things) that States are required to submit only that data not available through other sources.

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

Neither small businesses nor small entities are affected by this collection.

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 States to submit an application under ESEA programs funded through the Department. The statute also permits States at their discretion to submit a consolidated application. This collection will ensure the information provided by States in the consolidated application is the minimum required by the Department to fulfill its fiduciary responsibility.

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.

There are no special circumstances that apply to this collection.

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.

ED sought public comment on the paperwork requirements at the same time that the proposed regulations were published for public comment. Comments

were received on the regulation and are addressed within the regulation but there were no comments on the data collection activity.

A 60 day notice was published in the Federal Register on August 19, 2011 (Vol. 76 FR 51959). No public comments were received. A 30 day notice was published in the Federal Register for public comment.

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

No payment or gifts will be provided to respondents.

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 provided to respondents.

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 collection does not ask 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 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 be included in Item 14.**

The total burden estimate for this collection is 2,400 hours. We estimate that approximately 30 SEAs will request to make changes or updates to their consolidated state applications, and that for each of those SEAs it will take approximately 40 hours to collect the information needed to support the change request, approximately 39.5 hours to make the changes necessary in the application, and approximately 0.5 hours to obtain the necessary signatures and mail the application.

Primary costs to respondents fall into the following categories: collection of information, preparation of application, and mailing application. Based on an estimate of 30 forms submitted for amendments to the Consolidated State Application, costs to respondents are estimated to be the following for each submission. Costs for collecting information and preparing application are calculated at a GS 13/1 rate. Costs for mailing the application are calculated at a GS 6/1 rate.

Activity	Number of Respondents (SEAs)	Estimated Hours per Respondent	Total Estimated Hours for all Respondents	Cost Per Hour	Subtotal of Hours x Cost
Collecting Information	30	40	1200	\$33.84	\$40,608.00
Preparing Application	30	39.5	1185	\$33.84	\$40,100.40
Mailing Application	30	.5	15	\$14.43	\$216.45
TOTAL	30	80	2400		\$80,924.85

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:

Total Annual Costs (O&M) :

Total Annualized Costs Requested : _____

This information collection does not require the use of capital, start-up, operation and maintenance, or purchase 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.

There are no additional estimated annual Federal costs associated with this collection. Review of amendments to the consolidated state application is part of routine operations.

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

While the entire Consolidated Application is submitted for extended clearance, all states have submitted initial an application related to each of

the current requirements of the ESEA contained in this collection. ED will not require any state to complete and submit an entire Consolidated Application. However, since the Consolidated State Application is the basis for ongoing review of State performance, as States modify their respective program goals, performance targets and strategies, they are required to submit amendments to their existing application in accordance with EDGAR section 76.140 through 76.142.

The previous burden hour inventory for the Consolidated State Application was 38,532, which incorporated the burden on states to respond to new requirements from the 2008 Title I regulations. All states provided this information in 2008-2010. Therefore, the only burden currently associated with this collection is the burden hours for updating an application. We estimate that approximately 30 SEAs will request to make changes or updates to their consolidated state applications. We estimate that the burden hours for updating the application to be 2,400 hours. The burden for this collection is a program change decreasing burden and responses by 36,132 hours and 22 responses.

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.

Results of this 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.

The information collection will display the expiration date for OMB approval.

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

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This information collection will not employ statistical methods.