

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 purpose of the 21st Century Community Learning Centers (21st CCLC) program, as authorized under Title IV, Part B, of the Elementary and Secondary Education Act, §§4201 et seq., (20 U.S. Code §§7171 et seq., attached to submission package), is to provide expanded academic enrichment opportunities for children attending low-performing schools. Tutorial services and academic enrichment activities are designed to help students meet local and state academic standards in subjects such as reading and math. In addition, 21st CCLC programs provide youth development activities, drug and violence prevention programs, technology education programs, art, music and recreation programs, counseling, and character education to enhance the academic component of the program. In support of this program, Congress has appropriated nearly \$1 billion for afterschool programs for fiscal year 2007. About 6,800 rural and inner-city public schools in 1,420 communities—in collaboration with other public and nonprofit agencies, community- and faith-based organizations, local businesses, postsecondary institutions, scientific/cultural and other community entities—are now participating in the program.

The Education Department (ED) is requesting authorization to continue the collection of data through four Web-based, data-collection modules, the *Annual Performance Report*, the *Grantee Profile*, the *Competition Overview*, and the *State Activities* module (the form of each module is attached to the submission package), which collectively will be housed in an application called the *21st CCLC Profile and Performance Information Collection System (PPICS)*. The data will continue to be used to fulfill ED's requirement under the Government Performance and Results Act (GPRA) to report to Congress annually on the implementation and progress of 21st CCLC projects and the use of state administrative and technical assistance funds allocated to the states to support the program. The data collection will also provide SEA liaisons with needed descriptive data about their grantees and allow SEA liaisons to conduct performance monitoring and identify areas of needed technical assistance. The data ED requires is the same as that collected under approved OMB-No. 1810-0668. Again, the information ED seeks to collect reflects the changes in the program's authorization, accountability, and structure under NCLB. ED has worked in consultation with a group of SEA administrators, each of whom is overseeing his or her state's implementation of the 21st CCLC program to determine what their program monitoring information needs are and to ensure that the data required will not be onerous to grantees or to states.

The data ED will be collecting falls into two categories:

Data Collected From States

The PPICS Web-based system contains two sections/modules that seek information directly from SEAs on the administration of the 21st CCLC program. The first, the *Competition Overview*, will collect basic descriptive data about each state's 21st CCLC competition, including the number of applicants by applicant type, number of awards, total dollar amounts awarded, performance indicators for applicants, and any mandatory or competitive priorities utilized in the competition. ED needs this information to be able to be fully responsive to congressional and administrative inquiries about the use of the dollars appropriated to states and to ensure that states are aligning their programs to the legislative requirements that delineate the appropriate use of 21st CCLC funds. The completion of the *Competition Overview* will also trigger the addition of new grantees to the database, so that grantee and competition records remain current at all times.

In addition, around the time of the collection of the *Annual Performance Report* data, SEAs will also report their annual *State Activities* information. Under the authorizing legislation of the 21st CCLC program, states are able to use up to 2 percent of their fiscal-year allocation for state administration and oversight of the program and an additional 3 percent of their fiscal-year allocation for training, technical assistance to grantees, and evaluation of the program. The *State Activities* module seeks to obtain summary information from each state on the type and extent of the use of those discretionary funds. Obtaining this information will provide an avenue for oversight and monitoring of the federal funds expended for these purposes. Collection of this data will also help ED respond to legislative and other administrative inquiries.

Data Collected From Grantees

The reporting forms are organized around the central goals taken from the program's authorizing legislation:

Goals

Each eligible organization that receives an award may use the funds to carry out a broad array of before- and after-school activities (or activities during other times when school is not in session) that advance student achievement. Based on the authorizing legislation, local grantees are limited to providing activities within the following list:

1. Remedial education activities and academic enrichment learning programs, including providing additional assistance to students to allow the students to improve their academic achievement.
2. Mathematics and science education activities.
3. Arts and music education activities.
4. Entrepreneurial education programs.

5. Tutoring services (including those provided by senior citizen volunteers) and mentoring programs.
6. Programs that provide after-school activities for limited-English-proficient students that emphasize language skills and academic achievement.
7. Recreational activities.
8. Telecommunications and technology education programs.
9. Expanded library service hours.
10. Programs that promote parental involvement and family literacy.
11. Programs that provide assistance to students who have been truant, suspended, or expelled, to allow the students to improve their academic achievement.
12. Drug and violence prevention programs, counseling programs, and character education programs.

The 21st CCLC program uses multiple objectives and performance indicators to measure the progress of 21st CCLC grantees, as described below:

GOAL: To enable elementary and secondary schools to plan, implement, or expand extended learning opportunities for the benefit of the educational, health, social service, cultural, and recreational needs of their communities.

Objective 1 – Participants in 21st Century Community Learning Centers programs will demonstrate educational and social benefits and exhibit positive behavioral changes.

Achievement. Increasing percentages of students regularly participating in the program will meet or exceed state and local academic achievement standards in reading and mathematics.

Behavior. Students participating in the program will show improvements on measures such as school attendance, classroom performance, and decreased disciplinary actions or other adverse behaviors.

Objective 2 – 21st Century Community Learning Centers will offer a range of high-quality educational, developmental, and recreational services.

2.1 Core educational services. More than 85 percent of centers will offer high-quality services in core academic areas, for example, reading and literacy, mathematics, and science.

2.2 Enrichment and support activities. More than 85 percent of centers will offer enrichment and support activities such as nutrition and health, art, music, technology, and recreation.

Based on the goals and objectives of the 21st CCLC program, ED is seeking a renewal of approval to collect information to ensure compliance and gauge program impact. ED

seeks to collect descriptive information about program operation from each grantee, including grant-level information on program objectives and community partner and subcontractors' activity, contribution, and status during the year. Also, ED seeks to collect center-level information on the characteristics of a given center (hours, weeks, number of days open per week, staffing, activities by category and subject area, and intensity of service provision and participation); characteristics of feeder schools to the centers (the change in legislation now permits activities to occur at locations other than schools); center participation—including total numbers served and numbers of regular attendees (30 days or more); and aggregated student characteristics (racial, ethnic, gender makeup; special services or program and grade levels served). This information will be collected primarily through the one-time completion of the *Grantee Profile* module, but the fidelity of implementation will be assessed through reporting on the *Annual Performance Report*.

In the areas of student achievement and behavioral change, proposed data-collection efforts are to result in at least one of the following pieces of information being collected from grantees:

1. Changes in student grades for regular attendees in reading/English/language arts and math based on a fall-to-spring comparison.
2. The number of regular attendees falling within a given proficiency category on the state assessment test(s) administered during the reporting period for both reading/English/language arts and math.
3. The number of regular attendees whose test scores on the state assessment tests administered during the previous and current year in reading/English/language arts and math increased, decreased, or stayed the same.
4. Changes in student behavior as documented via teacher surveys.

Given that each state has created its own accountability structures for the 21st CCLC program, however, ED is requiring that grantees report on only one of the four listed student achievement and behavioral change areas listed.

The PPICS data collection is necessary to allow ED to collect information from states that are now directly administering the program and from the grantees to whom the states have awarded the grants. An overview table of the information sought by each PPICS module and the entity responsible for submission is included in the package.

OMB Reporting History and Legislative Authority

Clearance was granted for a revised information collection by the States under OMB No. 1810-0668 through November 30, 2007. The modules of the *Profile and Performance Information Collection System (PPICS)*, including the *Annual Performance Report*, will be primarily completed by grantee directors or center coordinators of 21st CCLC programs. The reporting forms are organized around four central goals taken from the program's authorizing legislation.

The legislative authority for ED to collect the data contained within the *Annual Performance Report* comes from two places:

- The Government Performance and Results Act (GPRA).
- The Education Department's General Administrative Regulation (EDGAR).

The Government Performance and Results Act of 1993 mandates that all federal agencies report program progress to the President and Congress annually, which includes annual performance plans (Section 1115 (a)) and reports (Section 1116 (a)). Performance plans must establish performance goals to define the level of performance to be achieved by a program activity (Section 1115 (a) (1)); express such goals in an objective, quantifiable, and measurable form (Section 1115 (a) (2)); establish performance indicators to be used in measuring or assessing the relevant outputs, service levels, and outcomes of each program activity (Section 1115 (a) (4)); and provide a basis for comparing actual program results with the established performance goals (Section 1115 (a) (5)). Program performance reports shall set forth the performance indicators established in the agency performance plan, along with the actual performance achieved compared with the performance goals expressed in the plan for that fiscal year (Section 1116 (b) (1)). Current indicators of program performance include improvement in student academic achievement; provision of services to high-need schools; extended program hours; and positive student outcomes and behavior (e.g., improved grades, program and school-day attendance, and disciplinary actions).

Under the Education Department's General Administrative Regulations (EDGAR, Section 75.720 and 80.40), grantees shall submit annual performance reports.

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 purpose of the information collected in PPICS is to provide (1) a standard format for SEAs and their grantees to use in their annual reporting, which program officers will use to direct technical assistance, and (2) data to report to Congress on program indicators and ED goals.

The audiences for these data include:

- ED program staff, to obtain descriptive information about the use of the 21st CCLC funds and better provide support to states and provide national leadership to states and their grantees.
- SEAs, to provide descriptive information for monitoring and to target technical assistance to individual sites and to the grantees as a group.
- Congress, to monitor program progress.
- Grantees, to encourage program improvement and to share with their communities.

- Policymakers and researchers.

The reauthorization of the program as part of NCLB changed the administrative structure of the program and more directly focused the activities and goals of the program's services. ED requires a consistent format to report on the implementation of the program to Congress. This can most readily be done through the *Competition Overview*, *Grantee Profile*, and *Annual Performance Report* modules. ED also uses the *Annual Performance Report* as a consistent way of evaluating the level of program implementation and the use of funds by grantees, assessing progress toward ED goals and GRPA indicators, and understanding states' and grantees' needs for 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 of using information technology to reduce burden.

Once data is entered in PPICS initially, Grantees access and submit information to the PPICS modules electronically, through a Web-based reporting system. Although the net gain in hours for this submission has increased, the prior submissions required two separate data submissions for grantees (one in spring and one in fall). The current submission requires one annual data submission with flexible opportunities to provide contact updates at any time through the *Grantee Profile* module. Additionally, the technology applied reduces the amount of narrative supplied in responses and provides greater opportunity to standardize responses through the use of drop down menus and check box responses. The change from federal to state administration of the 21st CCLC program creates an interim level of review required from each states' liaison which did not exist in the previously authorized statute and creates the overall increase in hours. Still, for ED and SEAs administering the program, the use of technology affords greater access and use of data by (1) accessing completed *Annual Performance Reports* more quickly; (2) more efficiently aggregating and analyzing grantee responses to specific questions; and (3) more easily storing and managing the hundreds of *Annual Performance Reports* received each year from grantees. Electronic collection affords greater efficiency for grantees by (1) eliminating the need to print and mail an original and two copies of the *Annual Performance Report*; (2) providing SEAs and grantees a system whereby initial data input on the *Competition Overview* and *Grantee Profile* automates additional reporting on enabling them to receive real-time technical assistance from ED and SEA staff, who can view their responses online; and (3) ensuring that all *Annual Performance Report* questions are completed fully and correctly. Grantees who do not have access to online technology are permitted to e-mail, fax, or mail the *Annual Performance Report*.

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.

The data to be collected in these instruments are not available from any other source on a national basis. The Department of Education is required by the Government Performance and Results Act of 1993 to produce an annual performance report to Congress on the status of all 21st CCLC program grantees. No other agency collects the information requested in a standard and uniform manner. Although in the past there have been several studies conducted on after-school programs, none have included a yearly report from all 21st CCLC program grantees. In addition, individual states may be collecting data from their grantees, but the data is not collected in a uniform fashion to report on the progress of the program on a national basis and in accordance with the authorizing legislation. Every effort has been made to ensure that states who are already collecting data are able to submit data in the form they have chosen, including working with every state that has identified an alternative means of collecting data through its own development of a collection system or through a subcontract to a vendor.

5. *If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.*

Not applicable to this report.

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 Government Performance and Results Act of 1993 mandates that all federal agencies and programs submit an annual program performance report to Congress detailing performance during the past fiscal year. Now that the states directly administer the program and the day-to-day implementation by grantees, ED's performance indicator reporting requirements and ED program officer decisions regarding state and grantee performance and national activities administration require annual data collection.

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 of more than three years; in connection with a statistical survey, that is not designed to produce valid and reliable results that 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.

No special circumstances apply.

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 three 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.*

A 60- and 30-day Federal Register notice was published in October and December 2011.

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

No payment or gift of any kind will be provided to respondents.

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

The Department will not receive any personally identifying information. The only information ED should receive will be aggregated at the program level.

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.*

None of the questions in PPICS or the *Annual Performance Report* concern topics commonly considered private or sensitive, such as religious beliefs or sexual practices.

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 13 of OMB Form 83-1. 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.

2012

In October 2012, grantees will be required to submit *Annual Performance Report* information in a Web-based format. The average respondent burden for the *Annual Performance Report* is estimated to be 24 hours. The estimate includes reading instructions; collecting all information not included in the site’s own evaluation efforts; making appropriate calculations; completing the *Grantee Profile* (which is separately estimated to take two hours to complete and is completed only once during the life of a grant), if not already done in some other format; making appropriate calculations; ensuring unduplicated counts of participants; answering all questions fully; and completing and submitting the online forms to ED. The estimate also includes completing the *Teacher Survey* information, since it is an optional part of the *Annual Performance Report* and is not a separate form. Across all sites, the total hour burden is estimated as follows:

If *Grantee Profile* completed:

1,400 grantees x 2 hours per grantee	=	2,800 hours
1,400 grantees x 24 hours per grantee	=	33,600 hours per year
		<u>x 1 year</u>
Subtotal for 2012	=	33,600 hours
With <i>Grantee Profile</i>	=	2,800 hours
Total	=	36,400 hours

This estimate can vary depending on the amount of information states require of their grantees. Each state has discretion to require all of the achievement-level data, but for purposes of this request, we are only requiring one element in the achievement data capture list be reported.

In most states, the grant directors of each grantee will complete the annual reporting forms and return the completed forms to ED. These tasks are expected to take an average of four hours. Administrative staff is expected to collect all other information, make necessary calculations, and ensure an unduplicated count of participants. These tasks are expected to take an average of four hours. We estimate that grant directors will earn, on average, \$25 per hour and that the average pay of administrative staff is \$8 per hour. Using these estimates, the average cost to respondents per site is estimated as follows:

Grant Directors (12 hours @ \$25 per hour)	=	\$300 per year
Administrative Staff (18 hours @ \$8 per hour)	=	<u>\$144 per year</u>
Average Cost per Grantee	=	\$444 per year

Across all grantees, the total cost to respondents is as follows:

1,400 grantees per year x \$444 per grantee	=	\$621,600 per year
		<u>x 1 year</u>
Total for 2004	=	\$621,600

Each SEA liaison will also be required to supply information about their state programs through the *Competition Overview* and *State Activities* modules. Once the *Competition Overview* is complete, each SEA will need to initiate a record for each grantee and provide basic descriptive information. The SEA liaison will then decide whether to allow the grantee to complete the *Grantee Profile* and *Annual Performance Report* information. Based on input from a representative group, the SEA liaisons have requested the ability to review and monitor the submissions made by their states' grantees prior to final submission to ED. We estimate that it will take one hour to complete the *Overview* and *State Activities* information, and an additional two hours to initiate a record for each grantee. Once the records are complete, we estimate that it will take an average of fourteen hours to review the information submitted by their grantees, for a total of 17 hours.

SEA Staff Input/Review (17 hours @ \$30 per hour)	=	<u>\$510 per year</u>
Average Cost Per SEA (54 total)	=	\$510 per year

Most programs already operate using computers and Internet access for administration, operation, and communication. If a grantee does not operate using a computer, print copies of the data-collection elements are acceptable. The costs associated with paper submission of this information collection are as follows:

Photocopying instructions, information pages, two Copies of all information submitted (200 pages @ \$.05 per page)	=	\$10 per year
--	---	---------------

Time to complete information in print format

Grant Directors (24 hours @ \$25 per hour)	=	\$600 per year
Administrative Staff (36 hours @ \$8 per hour)	=	<u>\$288 per year</u>
Average Cost per Grantee	=	\$898 per year

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.

There are no start-up costs or annual operational costs associated with this application.

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 expenses 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 PPICS database is currently an existing system in ED. Additional cost estimates for maintenance, technical assistance and report review are as follows:

Tasks for 2012:

Website/database maintenance and technical assistance	=	\$30,000
Review Reports:		

54 state reports @ 1 per .33 hours = 17.82 hours
1,400 grantee reports @ 1 per .33 hours = 462 hours

7 staff @ \$35/hour = \$245/hour

Total	=	<u>\$117,556</u>
Total for 2012	=	\$147,556.25

15. Explain the reasons for any program changes or adjustments reported in Items 14 or 15 of the Information Collection Submission Worksheet.

There are no program changes or adjustments to this request.

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 the report, publication dates, and other actions.

The results of this data collection may be used in several ways. The Department of Education will prepare an annual program performance report to be submitted to Congress. Additionally, aggregated data at the national level may be shared with the 21st CCLC grantees and with other interested parties outside of Congress. Portions of these data may be used in national leadership efforts, such as the implementation study of the 21st CCLC program and the National Partnership for Quality Afterschool Learning. Finally, at the state level, each state may use its own data for performance and compliance monitoring, as well as to provide specific information about their state's grantees.

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 for OMB approval will be displayed.

18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.