

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 collection of this information is part of the government –wide effort to improve the performance and accountability of all federal programs, under the Government Performance and Results Act (GPRA) passed in 1993. Under GPRA, a process for using performance indicators to set program performance goals and to measure and report program results was established. To implement GPRA, ED developed GPRA measures at every program level to quantify and report program progress required by the Elementary and Secondary Education Act of 1965, as amended, Title V, Part C. The GPRA program level measures for the Magnet Schools Assistance Program (MSAP) are reported in the Annual Performance Report (APR). The APR is required under EDGAR §§ 74.51, 75.118, 75.590, and 80.40. The annual report provides data on the status of the funded project that corresponds to the scope and objectives established in the approved application and any amendments. Under EDGAR 75.118, the report must provide the most current performance and financial information.

In previous MSAP grant cycles, grantees submitted GPRA data based on individual project formulations. This circumstance made it difficult to quantify and report the data accurately on MSAP’s overall performance. To ensure that accurate and reliable GPRA measure data are reported to Congress on program implementation and performance outcomes, MSAP wants to collect the raw data from grantees in a consistent format to calculate these data in the aggregate with the same mathematical procedures.

- 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.**

Data collection activities are designed to yield quantitative raw data that represents grantees program implementation and performance outcomes. This section details the data collection activities requiring clearance by the Office of Management and Budget. The information collected will be used to calculate MSAP’s performance for its GPRA measures. Exhibit 1 details the data collection instrument’s mode of administration, content, needed completion time, and estimated timeline for administration.

Exhibit 1. Data Collection Instruments

Instrument/ Respondent group	N	Mode of administration	Content	Time	Timeline
GPRAs Table/MSAP grantee school	153 MSAP schools	Data uploaded in G5 system with APR	GPRAs Data	30 minutes per MSAP school	March through May

- 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.**

Currently, grantees submit their APRs using the Department of ED’s electronic grant management system, G5. The GPRAs tables can be uploaded in the system with the APR using the G5 system. This simultaneous submission reduces the burden to grantees.

- 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 annual performance report data collected through the GPRAs Table are not currently available or collected via the current OMB approved generic annual performance reporting forms. Therefore, the data collected via the GPRAs Table will not cause a duplication of efforts.

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

The program does not impact small businesses or other small entities.

- 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.**

Grantees must submit the Annual Performance Report (EDGAR § 75.253). Without the data collection, ED could not report accurate and reliable GPRAs data to Congress or approve continuation funding. The annual performance report provides data on the status of the funded project that corresponds to the GPRAs measures established in the approved application and any approved amendments.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no circumstances that require this information collection to be conducted in a manner inconsistent with any of the conditions outlined under A.7 of the special instructions for the justification.

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.

Both a 60- and 30-day Federal Register Notice was published in October 2011 and January 2012, receiving no public comments. Also, two feedback webinar discussions were held with less than nine grantees and consultants that allowed them to provide input on the GPRA forms. Based on this feedback, adjustments were made to the forms to make them more user friendly.

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

No payments or gifts to respondents have been made and none are planned or contemplated.

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

There are no assurances 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.

The data collection includes 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 in item 13 of OMB Form 83-I.**
- **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.**

The GPRA Table data collection will occur annually, the responding grantee's estimated annual hour burden will be 30 minutes per MSAP school. The total estimated annual hour burden will vary per grant project because the number of schools in each MSAP project varies. The 2010 MSAP grant cohort had 153 schools, ranging from 1 to 10 magnet schools per project. Exhibit 2 shows the estimated annual/total respondent burden for this data collection as 76.5 hours.

Exhibit 2. Respondent Hour Burden Estimate

Data Collection Activity	Hour Burden per Respondent (in hours)	Total Expected Number of Respondents	Total Hour Burden (in hours)
GPRA Table	.50	153	76.5 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 : _____
Total Annual Costs (O&M) : _____

Total Annualized Costs Requested : _____

There are no costs that meet the criteria for inclusion under this item.

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.

Updating GPRA clearance package (20 hrs x \$35/hr)	= \$ 700
Staff time for review (3 staff x 60 hours/staff x \$35/hr)	= \$ 6,300
Cost of consultant/contractor to collect and analyze data	<u>= \$ 40,279</u>
Estimated total cost to the Federal government	= \$ 47,279

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

There are no program changes or adjustments to report as this is a new data collection.

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.

There are no plans for publication of the information.

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.

There are no plans to not display the expiration date of the OMB approval of the data collection.

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.