

Paperwork Reduction Act Submission Supporting Statement

Rural Education Achievement Program (REAP) Information Collection to Support Grant Funding Process

October 21, 2011

Introduction

This data collection is pursuant to the Secretary's authority under Part B of Title VI of the Elementary and Secondary Education Act (ESEA), to award funds under two grant programs designed to address the unique needs of rural school districts – the Small, Rural School Achievement (SRSA) program (ESEA Section 6212) and the Rural and Low-Income School (RLIS) program (ESEA Section 6221).

Under the SRSA program, the Secretary awards grants directly to eligible local educational agencies (LEAs) on a formula basis. Under the RLIS program, eligible school districts are sub-recipients of funds the Department awards to State educational agencies (SEAs) on a formula basis. For both grant programs, the Department awards funds based on a determination of the eligibility of individual school districts and the calculation of the allocation each eligible district should receive according to formula prescribed in the statute.

This data collection package consists of two forms and related documents that are used to accomplish the grant award process each year: (1) a spreadsheet used by SEAs to submit information to identify RLIS and SRSA-eligible LEAs and to allocate funds based on the appropriate formula, and (2) an application form for SRSA-eligible LEAs to apply for funding.

This submission requests a three-year extension of the current approved collection package (OMB #1810-0646). The REAP eligibility spreadsheet (Form 1) includes the following editorial upgrades:

- a) a column has been added on the spreadsheet that lists the changes in school status from the previous year (i.e. newly-opened, closed, merged) that have been received by the Department via ED Facts. In prior years, SEAs were asked to list any closed, newly- opened, or merged LEAs on the Corrections Spreadsheet; now, States merely have to indicate their concurrence or their disagreement with the ED Facts data already provided;
- b) the REAP eligibility spreadsheet also includes a column that gives a

preliminary indication as to whether a district will be eligible for SRSA or RLIS. This column is auto-formatted to display this indication, using the eligibility information provided in other columns on the spreadsheet.

Previously, there was no means to determine at a glance how the data entered by SEAs impacted an LEA's eligibility for SRSA for RLIS funding;

- c) Pursuant to the REAP Burden Reduction Initiative, the eligibility spreadsheet no longer asks SEAs to provide AYP status or REAP-Flex participation data. In prior years, the Department requested that SEAs provide this data along with the REAP eligibility data each year. Now, the Department receives annual REAP-Flex participation and AYP status via *EDFacts*, thereby eliminating the need for SEAs to provide this data on the REAP spreadsheets.

These upgrades are incorporated to simplify and improve the clarity of the eligibility spreadsheets; none of these edits require SEAs to submit additional data.

The SRSA Application (Form 2) is essentially unchanged from the previous collection.

The instructions accompanying both Form 1 and Form 2 have been edited to improve clarity and data quality, and other minor changes have been made to update dates and contact information. None of the upgrades described here require SEAs to submit additional data.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

Part B of Title VI of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act (P.L. 107-110), authorizes the Secretary of Education to award funds under two grant programs that are designed to address the unique needs of rural school districts – the Small, Rural School Achievement Program (ESEA Section 6212) and the Rural and Low-Income School Program (ESEA Section 6221).

The Department awards funds for both grant programs based on a determination of the eligibility of individual school districts, and calculating formula allocations for each eligible district. An extension of this data collection package is needed to provide the information necessary for the Department to make the grant awards.

Form 1 consists of a spreadsheet through which SEAs provide to the Department eligibility and allocation data for both the RLIS and SRSA programs. Additionally, Form 1 is supplemented with:

- (a) a document that SEAs use to submit corrections to the REAP spreadsheet;
- (b) a form for SEAs to report the LEAs in their States that meet the statutory alternative rural definition; and
- (c) a form through which SEAs can obtain or verify the NCES local code assignment of individual schools within a district.

Form 2 consists of the application package for LEAs under the REAP Small, Rural School Achievement (SRSA) program (CFDA #84.358A).

Under the SRSA program, the Secretary awards grants directly to LEAs on a formula basis. Eligibility for this program is based on rural status and average daily attendance (ADA) for the district by December 1st of each year. To be eligible, an LEA must: 1) (a) have a total ADA of less than 600 students, or (b) serve only schools located in counties with a total population density of fewer than 10 persons per square mile; and 2) (a) serve only schools that have an NCES school locale code of 7 or 8, or (b) be located in an area of the State defined as rural by a governmental agency of that State. Allocations are based on the ADA numbers for eligible LEAs and the LEA's previous year's allocations under the following ESEA provisions: 1) subpart 2 of Title II (Teacher and Principal Training and Recruiting); 2) section 2412(a)(2)(A) of Title II (Technology Grants); 3) section 4114 (Safe and Drug Free Schools); and 4) Part A of Title V (Innovative Programs).

The Department collects only information that is essential to making the awards in the SRSA application form. As a result, the SRSA application form is only one page. In addition, the Department requires eligible LEAs to apply only once, during their initial funding year; the applications are retained and used for each succeeding fiscal year for which the LEA remains eligible for a grant under the SRSA program.

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 from SEAs through Form 1, the REAP eligibility spreadsheet, which collects eligibility and allocation data, is used by the program office in coordination with Budget Service to determine school district eligibility for the program and to allocate funds to eligible districts.

The information from Form 2 (the SRSA application package) is used to process grant awards under the SRSA program.

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.

SEAs submit the REAP eligibility spreadsheets via email, while SRSA- eligible LEAs submit their applications through the Department's G5 electronic submission system.

Additionally, with regard to the REAP eligibility spreadsheets (Form 1), The REAP Program Office is proposing to use the MAX data and collaboration portal (<https://max.omb.gov/maxportal/>) to collect REAP eligibility data, track changes to that data, and interface with SEAs online. This OMB-sponsored portal provides authentication services, collaboration systems, data collection and tracking mechanisms, document publishing, and more.

Currently, the data for the REAP eligibility spreadsheets and supporting documents is collected and revised via email communication with SEAs. The Program Office is proposing to use the MAX data and collaboration portal to replace the e-mail based data submission procedures now used by the REAP Program Office and its SEA respondents. This OMB-sponsored portal will help SEAs by providing a more direct, efficient, and accurate system of data collection and communication with the Program Office.

4. 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.

Form 1 (the REAP Eligibility Spreadsheet under OMB 1810-0646) collects from States LEA level data that is required to determine LEA eligibility to participate in both REAP formula grant programs program and to determine LEA level budget allocations. The system that we have instituted for determining eligibility is time-bound and incorporates data from several sources. The process that we use is similar to the processes the Department uses to determine eligibility and allocations for Title I and other formula grant programs, none of which relies solely on ED Facts as the data source for making those determinations. After numerous discussions with ED Facts staff, we have determined jointly that it is not feasible at this juncture for ED Facts data to be the primary source of data support the REAP eligibility determination process. As an example of the REAP Program's need to rely on data outside of ED Facts, the LEA-level average daily attendance (ADA) that we collect from SEAs on the REAP eligibility spreadsheets is defined in Section 6231 of the REAP statute as:

*“a census to determine the number of students in average daily attendance
in kindergarten through grade 12 at the schools served by the agency”*

This definition is not consistent with the definition of ADA that States use to provide ADA for the ED Facts collection.

Nonetheless, we have explored with *EDFacts* ways that *EDFacts* data might support our needs. For the past three years, the REAP program office has collaborated with *EDFacts* staff to align, to the extent possible, REAP data definitions and elements with *EDFacts* data collection protocols. Our objective here is to shift a number of data elements from the REAP spreadsheet to the *EDFacts* annual data collection, and thereby reduce the annual reporting burden that REAP imposes on States. The success of this collaboration is evidenced by the fact that beginning in SY 2011-12, the program office will collect the REAP AYP and REAP-Flex participation data through *EDFacts*; we will no longer need to request these data from SEAs as part of this collection.

In addition, we do use data from the *EDFacts*/CCD collection to provide our universe of schools. NCES Locale code data comes from the Census. We then match the locale code data to individual schools within each district to determine each district's eligibility based on locale codes. The poverty data we use for RLIS eligibility also comes from Census.

Form 2 (the SRSA Application Package) requests a subset of the information requested in Standard Form 424 (Application for Federal Financial Assistance), which consists of the minimum needed to make grant awards. The only information that is common to Form 424 and the Form 1 (Eligibility Spreadsheet) of this collection is the NCES LEA ID number, which will be used to link allocation and application data to make awards. We would not be able to make this link without the ID number.

However, at this point in time, the data that SRSA requires and the timelines within which those data are needed to make eligibility determinations and allocation decisions are not identical to the *EDFacts* data element definitions and timelines for data collection. The program office will continue to re-visit these issues and explore ways to reduce the burden to SEAs.

5. Information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.

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

6. 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.

Small LEAs are affected by this program. In order to minimize burden for these small entities, the Department proposes an application package that contains minimal request for data- a subset of the information requested in Standard Form 424 and information required by the statute. The Department also intends to make these applications available as electronic applications, which will also minimize burden.

If the information requested is not collected, the Department will be unable to make grant awards, because the formula allocations cannot be calculated without data from SEAs and LEAs.

7. Special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.5.

This collection is consistent with the paperwork burden regulations of 5 CFR 1320.5.

8. 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.

The Department consulted with 9 SEAs and asked them to estimate the burden for these collections at the district level. The burden estimates in this document are based on those responses. The Department has not received comments from SEAs or LEAs on the issue of data collection and burden during the past two years that the collection package has been in use.

9. Payment or gifts to respondents, other than remuneration of contractors or grantees.

No payment or gifts will be provided.

10. Assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulations, or agency policy.

There is no assurance of confidentiality. **All data collected is in the public domain.**

11. Justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

This collection does not ask questions of a sensitive nature.

12. Estimates of the hour burden of the collection of information and the annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The total annual reporting and recordkeeping burden for the collection is estimated to be 3,377 hours.

For Form 1 (the REAP Eligibility Spreadsheet, the subject of this clearance) the

maximum number of respondents is 49 SEAs. The average burden per respondent is 40 hours and number of responses per applicant is one per annum. The total estimated burden to SEAs is estimated to be 1,960 hours per annum. In addition, LEAs will review and verify the data entered by the State at an estimated burden of 15 minutes per LEA for 5,000 LEAs. The total LEA burden is approximately 1,250 hours. The total estimated burden hours for Form 1 for SEAs and LEAs combined is 3,210 hours.

For Form 2 (the Small, Rural School Achievement Program Application, the subject of this clearance), the maximum number of respondents is 500. The average burden per response is 20 minutes and total number of responses per applicant is one. The data collection occurs annually. Based on 500 responses, which will take an average of 20 minutes per applicant to complete report, the total burden is approximately 167 hours.

Estimate of the total annual cost burden to respondents or record keepers for capital expenses resulting from the collection of information.

The total annual cost burden to respondents is estimated at \$59,230.

For Form 1 (the REAP Eligibility Spreadsheet), primary costs to respondents fall into the following categories: collection of data, filling in information in the spreadsheet, review of data, and e-mailing the form. Based on an estimate of 49 forms prepared and submitted annually, costs to respondents are estimated to be the following:

<u>Collecting data</u>					
49 forms	X	36 hours /form	X	\$25/hour	= \$ 44,100
<u>Filling in information</u>					
49 forms	X	1.5 hours /form	X	\$10/hour	= \$735
<u>Data Collection/Review</u>					
5,000 LEAs	X	.25 hours/review	X	\$10/hour	= \$12,500
<u>E- mailing report</u>					
49 forms	X	.5 hours /form	X	\$10/hour	= \$ 245
Total cost to respondents					\$57,580

For Form 2 (the Small, Rural School Achievement Program Application), the primary cost to respondents is for filling out the electronic application form. Based on an estimate of 500 applications prepared and submitted annually, costs to respondents are estimated to be the following:

500 applications X .33 hours /application X \$10/hour = **\$1,650**

13. Estimate of the total annual cost burden to respondents or record keepers for capital expenses resulting from the collection of information.

This information collection does not require the use of any capital equipment, start-up costs or record keeping not included in the response to question # 12.

14. 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.

For Form 1 (the REAP Eligibility Spreadsheet), program costs entail reviewing completed spreadsheets for completeness; downloading data submitted electronically; calculating allocations; and notifying States of allocations for the State and districts.

Downloading data submitted electronically	.5 hours/form X 49 forms X \$40/hour =	\$980
Reviewing completed spreadsheets for completeness:	1.5 hours/form X 49 forms X \$40/hour =	\$2,940
Calculating allocations	.5 hours/form X 49 forms X \$40/hour =	\$ 980
Notifying States of allocations for the State and districts.	.5 hours/form X 49 forms X \$40/hour =	\$ 980
	.5 hours/form X 49 forms X \$12/hour =	\$ 294
TOTAL		\$ 6,174

For Form 2 (the Small, Rural School Achievement Program Application), program costs entail screening applications for eligibility; downloading allocation data into GAPS; making grant awards; and mailing award notifications.

screening applications for eligibility	20 hours X \$40/hour =	\$ 800
downloading allocation data into GAPS	8 hours X \$40/hour =	\$ 320
making grant awards	250 hours X \$40/hour =	\$10,000
mailing award notifications	150 hours X \$12/hour =	\$ 1,800
TOTAL		\$12,920

15. Reasons for any program changes or adjustments.

With regard to Form 1 (the REAP Eligibility Spreadsheet), we have reduced the maximum number of SEA respondents from 52 to 49; the District of Columbia, Hawaii, and Puerto Rico are unitary districts, and by virtue of their demographics do not meet the eligibility criteria for either RLIS or SRSA. In addition, this collection will no longer ask SEAs to provide REAP-Flex or AYP data.

With regard to Form 2 (the the Small, Rural School Achievement Program Application), the Office of General Counsel has determined that SRSA LEAs need not apply every year, so the Department has reduced the previous estimate of 4,500 applicants to an estimated 500 applicants.

16. Plans for tabulation and publication.

The Department will publish the list of grantees under each program and their allocations. Allocations are based on the formulas required by the statute. No complex analytical techniques will be used.

17. Reasons not display the expiration date for OMB approval.

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

18. Exception to the certification statement identified in the “Certification for Paperwork Reduction Act Submissions.”

There are no exceptions to the certification statement.

19. Collections of Information Employing Statistical Methods

This information collection will not employ statistical methods.