

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Paul Douglas Teacher Scholarship Program

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 hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section¹. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

The Paul Douglas Teacher Scholarship was authorized under Title V Part C, Subpart 1 of the Higher Education Act of 1965, as amended (20 U.S.C. 1104 through 1104K) and administered under 34 CFR Part 653. Both the Program statute and regulations have long since been repealed. The program was last funded in Fiscal year 1995.

Under the Paul Douglas Teacher Scholarship Program, the Department of Education issued grants to the states to provide scholarships to outstanding secondary school graduates who demonstrated an interest in teaching careers at the pre-school, elementary, or secondary level. The repealed Program regulations allowed the Department to require any reports deemed necessary to make certain that the functions of the Paul Douglas Program were carried out. Section 80.40(b)(1) of the Department of Education General Administrative Regulations (EDGAR) states that "...grantees shall submit annual performance reports...". The information collection in this performance ensures that state education agencies are monitoring the fulfillment of the scholarship obligations by former Douglas scholars in accordance with legislation and regulations that governed the Paul Douglas Teacher Scholarship Program when the scholarships were granted.

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.

Each of the former participating state education agencies provides information on the annual Performance Report to demonstrate compliance with the program's statutory and regulatory requirements applicable at the time the funds were disbursed.

State education agencies are held accountable for evidence that former Douglas scholarship recipients meet all statutory and regulatory requirements. The designated state education agency is accountable to the Federal government for the adequate documentation of student compliance. State maintained fiscal and program records must demonstrate that former Douglas recipients complied or are complying with all the applicable statutes and regulations.

¹ Please limit pasted text to no longer than 3 paragraphs.

The Performance Report is the only vehicle by which Federal program officials may annually monitor and evaluate the compliance of state education agencies. Without this data collection, the Federal program officials would have no means by which to monitor, evaluate and ensure compliance with the program statute and regulations enforce at the time the scholarships were granted.

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.

State education agencies are encouraged to use computer technology when feasible and cost effective. State education agency use of electronic media for the retention of records for the Paul Douglas Teacher Scholarship Program is approved under the provisions of EDGAR, section 80.42. A draft performance report will be posted on our web site informing the states as to the status of the proposed performance report. When OMB approves this collection we will reflect this on the web site.

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.

A single designated agency in each state is responsible for monitoring and reporting the Paul Douglas Teacher Scholarship Program. Each state education agency annually provides state specific data on its Performance Report that is not collected on any other form. Therefore, there is no duplication of reported information.

Similar information for each state is not available from other sources. There are no other applicable report forms available for carrying out these functions.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

The collection of information in this program does not impact any small entities. State education agencies were the only grant recipients of the Paul Douglas Teacher Scholarship Program.

This form only requests the information needed to evaluate the compliance of the former scholars. All the information requested should be collected routinely by a state education agency in the normal monitoring and evaluation of the remaining program activities. Thus, the reporting burden is minimal.

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.

Information collection and recordkeeping must be kept on a yearly basis, at a minimum, in order to be accurate. Any lapse in the keeping of required information makes it impossible to determine accountability for use of Federal funds in compliance with statute and regulations.

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.

This report form is consistent with the general information collection guidelines specified in 5 CFR 1320.5(d)(2).

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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 State agencies were asked to review the FY 1992 edition of the Performance Report and comment in June 1993, and few comments were provided. This program has not received funding since 1995. The original form expired on August 31, 2003. The form was last used in the winter of 2003. On the advice of the Office of General Counsel (OGC), OPE stopped requiring submission of the performance report because both the statute and regulations had been repealed. However, after several states contacted the program office requesting guidance on how to comply with the requirements in effect when they won the grant awards, OGC recommended reinstating the report. The 60 day notice was published in the Federal Register on December 9, 2011 (76 FR 76961) requesting comments from the states. No comments were received. A 30-day Federal Register Notices was published to allow public comment.

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

There are no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.² If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

There is no assurance of confidentiality to state educational agencies.

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,

² Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

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.

There are 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 by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. 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 the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)
- 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.

There are a total of 30 respondents to this annual information collection. The total number of burden hours is 360.

$$12.0 \text{ hours} \times 30 \text{ respondents} = 360 \text{ hours}$$

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 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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12

Total Annualized Capital/Startup Cost	:	
Total Annual Costs (O&M)	:	

Total Annualized Costs Requested	:	

The total for the capital and start-up cost components for this Information Collection is zero.

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.

The annual cost of the federal government for the processing of this performance report is estimated to be \$4,350.00. This cost includes staff time in (1) preparing, printing, and mailing reports; (2) processing the reports submitted by the States; (3) recording and reviewing the data for state compliance with the program statute and regulations; and (4) preparation and posting of the Performance Report on the Institutional Development and Undergraduate Education Program Service web pages.

FEDERAL GOVERNMENT COSTS:		
Professional Staff (100 hrs @ \$40.00/hr)	-----	\$4,000.00
Computer time		\$50.00

World Wide Web preparation and posting ----- (One Professional Staff x 10 hr @ \$30.00/hr)	\$300.00
Total estimated cost to the Federal Government -----	<u>\$4,350.00</u>

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

This request is an adjustment of burden hours. The reduction from the current inventory of 684 hours to 360 hours of burden is due to the fact that this program has fewer states that still need to submit performance reports (from 57 states to 30 states).

The hourly estimate includes identifying and collecting the relevant information, formatting and preparing the report response, securing appropriate signatures, and maintaining records.

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 are not intended for statistical use or publication.

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 of the information collection will be displayed on the form.

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

There are no exceptions.