

Race to the Top - District Application for Initial Funding:

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

A.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.

On February 17, 2009, President Barack Obama signed into law the American Recovery and Reinvestment Act of 2009 (ARRA), historic legislation designed to stimulate the economy, support job creation, and invest in critical sectors, including education. The ARRA established the foundation for education reform by supporting investments in innovative strategies that are most likely to lead to improved results for students, long-term gains in school and school system capacity, and increased productivity and effectiveness. The ARRA initially provided \$4.3 billion for the Race to the Top Fund (referred to in the statute as the State Incentive Grant Fund) to support a State education reform program (Race to the Top State grants).

Building on the Race to the Top State grants, Congress appropriated \$550,000,000 under the Consolidated Appropriations Act of 2012 for grants to States or local educational agencies (LEAs), in order to continue carrying out the activities authorized under the State Incentive Grant Fund. The Department of Education reserved approximately \$383 million for a district-level Race to the Top competition to be held in 2012.

LEAs will be afforded similar opportunities as States to implement education reforms by using grant funds in the development and implementation of strategies, structures and systems with a personalized, student-focused approach to learning and teaching that use collaborative, data-based strategies and tools to deliver instruction and supports tailored to the needs and goals of each student, with the goal of enabling all students to graduate college- and career-ready. Specifically Race to the Top – District grants will provide funding for LEAs, or consortia of LEAs, to increase student centered learning environments, that are designed to significantly improve learning and teaching through the personalization of strategies, tools, and supports for teachers and students that are aligned with college- and career-ready standards; increase the effectiveness of educators, and expand student access to the most effective educators in order to raise student achievement; decrease the achievement gap across student groups; and increase the rates at which students graduate from high school prepared for college and careers.

Because the FY 2012 funds must be obligated before December 31, 2012, and this is the first competition for the new Race to the Top-District program, an expedited collection is necessary in order to meet the statutory obligation deadline.

In order to allow applicants sufficient time to complete the application and to allow peer-reviewers to evaluate the completed applications for this new program, emergency clearance is necessary.

A.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 is in the form of a single application that will be submitted by LEAs for this competition. LEAs must submit to the Department an application that provides the following information:

Race to the Top Application Assurances that include the signature of the Superintendent/CEO, local school board president, and local teacher union/association president (where applicable). *(Part IV of the Application)*
Program-Specific Assurances for LEA and Consortia Applicants *(Parts V and VI of the Application)*
Other Assurances: Accountability, Transparency, Reporting Assurances and Other Assurances and Certifications. *(Part VII of the Application)*
Selection Criteria addressed by applicants. *(Part IX of the Application)*
Budget *(Part XI of the Application)*
Budget Narratives *(Part XI of the Application)*
Indirect Costs *(Part XI of the Application)*
(For consortia applicants only) Memoranda of Understanding *(Part XIII of the Application)*

This is a new collection. The Department plans to use a two tier review process to judge the eligible applications submitted by the LEAs or consortia. The Department will use independent reviewers who have been chosen from a pool of qualified educators, policymakers, scholars, and business leaders. All reviewers will be thoroughly screened for conflicts of interest to ensure a fair and competitive review process.

A.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.

The information requested under this collection will be submitted, on a CD, via non-electronic means such as courier or postal service. The information gathered through this process is detailed in A2.

A.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 assurances and information requested under this collection are unique to the Race to the Top - District program, and the Department has not collected them in the past. Even in the event of similar or comparable information for other programs in the past, the assurances are specific to the Race to the Top – District program and the information is specific to the present point in time. Therefore, any comparable information and assurances that were collected in the past would not satisfy the requirements for this program.

The Department has made every effort to reduce the burden on LEAs in producing the information. Where applicable, LEAs may use existing data sources that the Department has on file.

A.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.

Small entities that may apply for the Race to the Top-District program include small LEAs. The Department has made an effort to streamline the application process for all applicants. Additionally, the Department will monitor the application and review process to identify any areas where burden can be reduced for future competitions.

A.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 consequence of not conducting the collection of information under the Race to the Top - District program application process would be that LEAs would not be able to receive Race to the Top – District funds and the program could not be implemented. The Department must conduct this collection in order to award all program funds by December 31, 2012. The Department would have to return authorized funds to the Treasury if it does not conduct this information collection.

The Department intends to award funds beginning in December 2012. The requested emergency clearance will provide time for applicants to develop the plans that they would implement if awarded the grant.

A.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.*

This collection is consistent with 5 CFR 1320.5(d)(2).

A.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.

Since there is the December 31, 2012 statutory deadline for making grant awards and an immediate need to make applications available for this new program, the Department is waiving notice and comment rulemaking for the Race to the Top-District competition under the authority of section 437(d)(1) of the General Education Provisions Act. Similarly, the Department is requesting that OMB waive the public comment period and grant emergency approval of the Race to the Top-District package no later than two weeks of receipt of documentation.

Although this collection is submitted under emergency processing and the Department was not required to conduct notice and comment rulemaking with respect to this competition, in order to obtain public input on the structure of the program, the Department has still provided an alternative method to receive public input. The public was invited to provide input on an executive summary for Race to the Top – District, which included draft: priorities, eligibility requirements, selection criteria, definitions,

and application and program requirements. The executive summary for Race to the Top – District was posted on the Department’s web site from May 22 to June 8 allowing the public the opportunity to submit opinions, suggestions and comments. Approximately 475 comments were received from a variety of education organizations as well as the general public.

A.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.

A.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.

A.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.

There are no questions of a sensitive nature.

A.12. Provide estimates of the hour burden of the collection of information.

A. Burden hours for respondents

The Department estimates that each LEA or consortium of LEAs will spend approximately 238 hours of staff time to address the application requirements and selection criteria, prepare the application, and obtain necessary clearances. The total number of hours for all applicants will vary based on the number of applications; we estimate that we will receive approximately 120 applications. We estimate the average total number of hours for all applicants to be (238 hours x 120 = 28,560 hours) We estimate the average total cost per hour of the LEA-level staff who carry out this work to be \$30.00 an hour. The total estimated cost for all applicants would be \$856,800 (\$30/hour x 28,560 hours = \$856,800).

Application Section	Hours
A. Vision	19
B. Prior Track Record of Success	20
C. Preparing Students for College and Careers	46
D. LEA Policy and Infrastructure	38
E. Continuous Improvement	31
F. Budget and Sustainability	52

Optional Budget Supplement (OPTIONAL)	8
Competitive Preference Priority (OPTIONAL)	9
Application Requirements	15
Total	238

A.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: 0

Total Annual Costs (O&M): 0

Total Annualized Costs Requested: 0

There are no start-up costs for this collection.

A.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 Federal costs will involve screening the applications, managing the grant review, and awarding Race to the Top-District funds to applicants.

- Grade 12: 750 hours at \$41.26/hour = \$30,942.75
- Grade 13: 150 hours at \$49.06/hour = \$7,359
- Grade 15: 100 hours at \$67.88/hour = \$6,787.70

The Department plans to award a contract for assistance with the application review. The value of the grant review is expected to be approximately \$3,190,000. The calculation includes the review costs associated with both a competition, and includes costs for meeting space for the review, contractual support, conference calls, printing, and mailing expenses, computer and printer rental, reviewer expenses (travel, lodging, compensation, etc.).

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

This is a new collection related to a new program. This results in an increase in burden and responses of 28,560 hours and 120 responses.

A.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.

Some of the information collected in this grant application may be analyzed with performance data and shared on a government website such as ed.gov.

A.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 will be displayed on the form.

A.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 identified in the "Certification for Paperwork Reduction Act Submissions" Form

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.