

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 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 Department of Education (Department) is requesting reinstatement of the Application for Grants Under the Child Care Access Means Parents in School (CCAMPIS) (OMB No.: 1840-0737) for a period of three years. The Department requested the application be discontinued in February 2012. The reinstatement conforms with Office of Management and Budget (OMB) mandates. The application has been updated to conform with changes mandated by passage of the Higher Education Opportunity Act of 2008 (P.L. 110-315), which amended and reauthorized the Higher Education Act (HEA) of 1965.

The CCAMPIS Program provides grants to institutions of higher education to assist the institutions in providing campus-based child care services to low-income students. In accordance with SEC. 410. CHILD CARE ACCESS MEANS PARENTS IN SCHOOL, Title IV, Part A, Subpart 7, Sec. 419N; § e(1) (A) of the amended HEA and the Education Department General Administrative Regulations (EDGAR), § 80.40, Monitoring and reporting program performance, specifies an annual reporting period for CCAMPIS grantees.

The Department will use the collected information to make decisions on funding for new grants under the CCAMPIS 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 application package requests programmatic and budgetary information needed to evaluate new applications and make funding decisions based on the authorizing statute and the Education Department General Administrative Regulations (EDGAR). Failure to collect this information would prevent the awarding of appropriate funds, as essential information would not be available for evaluating the applications in accordance with the

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

authorizing statutes and EDGAR. A copy of the authorizing statute is included in this clearance package.

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.

Applications for grants under the CCAMPIS Program will be submitted electronically through Grants.gov. We estimate receiving 100% of the applications electronically. The application package will be prepared in a format for easier and faster posting of information on the Web. Prospective applicants will be able to view and download the application from the Grants.gov website, <http://www.grants.gov/search/basic>.

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.

Since the information submitted in the report is unique to each respondent, no duplication exists as far as can be determined. No other collection instrument is available to collect the information that is being requested.

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.

This information collection does not involve 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.

If the information collection is not conducted or is collected less frequently, the Department would not be able to evaluate applications and make funding decisions based on the provisions in the authorizing statute and EDGAR.

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.

No information will be collected in the manner covered under any of the special circumstances outlined.

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 Department will publish 30-day Federal Register Notice to solicit public comment on the application. The Department will also solicit informal views and comments from customers during the meeting of project directors, as appropriate, during yearly national

and regional education and accreditation conferences and during the pre-application workshop conducted for prospective applicants prior to the competition.

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

The Department does not provide any 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.

The Department's disclosure policies adhere to the provisions of the Privacy Act.

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 performance report form does not include questions about sexual behavior and attitudes, religious beliefs or other items that are commonly considered sensitive and private.

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

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)

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.

In an effort to meet the Office of Management and Budget (OMB) mandates to provide enhanced results based on demonstrated information received for this program, the estimated reporting burden hours are 25 hours per respondent. We expect approximately 350 applicants. Therefore, the estimated burden hours for this collection of information are 25 hours per 350 respondents or 8,750 total burden hours. Burden hours are shown for the total number of estimated applicants for the competition.

Applications are submitted once every four (4) years. We estimate approximately 350 applicants for the FY13 competition:

Estimated number of respondents	350
Estimated preparation time	25 hrs
Estimated burden hours	8,750/4 years
Total estimated burden hours	2,188

(Estimated Burden: 8,750 hours Total -- Number of hours of preparation time (25) times by the total number of respondents (350) equals estimated burden hours.)

Most of the costs of this data collection are borne by the Federal Government. The annual cost to the grantee to respond to this data collection is estimated as follows:

Estimated annual costs to applicants:

Professional (350 personnel X 20.0 hours @ \$30 per hour)	\$210,000
Clerical (350 clerical X 5 hours @ \$ 12 per hour)	<u>21,000</u>
Total estimated costs to respondents	\$231,000

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: \$0
Total Annual Costs (O&M) : \$0
Total Annualized Costs Requested : \$0

The total for the capital and start-up cost components for this information collection is zero. This information collection will not require the purchase of any capital equipment nor create any start-up costs.

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 largest portion of the Government’s cost is borne directly by the Department of Education in designing the report form, securing clearance of the form, and in collecting, aggregating and disseminating the information.

Estimated annual cost to the Federal Government	
Professional staff to develop clearance package (GS-15 employee) \$74 per hour X 40 hours = \$2,960 (GS-14 employee) \$60 per hour X 120 hours = \$7,200 (GS-13 employee) \$48 per hour X 20 hours = \$960	\$11,120
Overhead cost related to facilities, administration, and other indirect cost plus accrual of leave and fringe benefits @ 50% of salary \$11,120 X 50 percent of salary = \$5,560	\$5,560
Other Department staff to review and approve the request: (GS 15 employee) \$74 per hour X 10 hours = \$740 (GS 14 employee) \$60 per hour X 20 hours = \$1,200 (GS 13 employee) \$48 per hour X 20 hours = \$ 960	\$2,900
Overhead costs: \$2,900 X 50 percent = \$1,450	\$1,450
Cost of Federally-supervised Review of Applications (estimate)	
Non-federal field reviewers: 70 reviewers 70 x \$1,100 = \$77,000	\$77,000
Contractor logistical support for workshops, application review, field reading, and slate preparation	\$79,849
Staff to conduct supervised review of applications (2 weeks x 2 control reviews and 15 panel chairpersons) 18 staff x 60 hours x \$48 per hour = \$51,840 Overhead costs: \$51,840 x 50 percent = \$25,920	\$77,760
Staff to prepare, process and approve funding slate (3 staff x \$60 x 40 hours = \$7,200) Overhead costs: \$7,200 x 50% = \$3,600	\$10,800
Staff to generate and issue 100 grant awards (GS 15 employee X 1) \$74 per hour X 8 hours = \$592 (GS 14 employee X 2) \$60 per hour X 12 hours = \$1,440 (GS 13 employee X 3) \$48 per hour X 10 hours = \$1,440 (GS 12 employee X 6) \$32 per hour X 8 hours = \$1,536 (GS 11 employee X 5) \$30 per hour X 8 hours = \$1,200	\$6,208
Overhead costs: \$6,208 x 50% = \$3,104	\$3,104
TOTAL ESTIMATED COSTS TO GOVERNMENT – COMPETITION YEAR	\$275,751

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).

The burden hours have not increased. Since this collection is technically new, all 8,750 hours are new. The current burden estimate is based on the anticipated 350 respondents expected for the FY 2013 competitive cycle.

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.

The results of the collected information will not be published.

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 Department will display the expiration date for the OMB approval as required on the approved application.

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

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Statement.

The collection of information does not employ statistical methods.