

## **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).

In 2010, the Department conducted Race to the Top State competitions, which provided incentives to States to adopt bold and comprehensive reforms in elementary and secondary education and laid the foundation for unprecedented innovation. A total of 46 States and the District of Columbia put together plans to implement college- and career-ready standards, use data systems to guide teaching and learning, evaluate and support teachers and school leaders, and turn around their lowest-performing schools. The Race to the Top State competitions provided States with incentives to implement large-scale, system-changing reforms designed to improve student achievement, narrow achievement gaps, and increase graduation and college enrollment rates.

The Race to the Top Assessment program, also authorized under the ARRA, supports consortia of States in developing new and better assessments aligned with high standards. In 2011, the ARRA was amended by section 1832(b) of Division B of the Department of Defense and Full-Year Continuing Appropriations Act, 2011 (Pub. L. 112-10), which added an additional education reform area: strengthening the quality of early learning and development programs and increasing access to high-quality early learning programs for all children, including those with high needs. As a result, the Department had the authority to use a portion of the FY 2011 and FY 2012 appropriations for Race to the Top on the Race to the Top-Early Learning Challenge program, which is jointly administered by the Departments of Education and Health and Human Services. The Race to the Top-Early Learning Challenge supports 14 States' efforts to strengthen the quality of their early learning programs.

On May 22, 2012, the Secretary announced the Race to the Top – District program, which is designed to build on the momentum of other Race to the Top competitions by encouraging bold, innovative reform at the local level. This district-level program is authorized under sections 14005 and 14006 of the ARRA, as amended. Congress appropriated approximately \$550 million for Race to the Top for FY 2012. Of these funds, the Department awarded approximately \$383 million to 16 Race to the Top – District grantees representing 55 local educational agencies (LEAs), with grants ranging from \$10 to \$40 million. The amount of an award for which an applicant was eligible to apply depended upon the number of students who would be served under the application.

The Race to the Top – District competition is aimed squarely at classrooms and the all-important relationship between educators and students. The second phase of the Race to the Top – District program will again support applicants that demonstrate how they can personalize education for all students in their schools. The priorities, requirements, definitions, and selection criteria that will be used in the upcoming competition are almost identical to those used in the FY 2012 competition.

In that regard, through this competition, the Department will encourage and reward those LEAs or consortia of LEAs that have the leadership and vision to implement the strategies, structures, and systems needed to implement personalized, student-focused approaches to learning and teaching that the Department believes will produce excellence and ensure equity for all students.

In anticipation of a subsequent competition, the Department conducted the rulemaking and PRA process. The Notice of Proposed Priorities was published in the Federal Register on April 16, 2013 (p. 22451 -22467). A 30-day comment period was offered. We are now preparing to publish the NFP and NIA, along with finalizing the PRA process. This will allow enough time for LEAs to submit high-quality applications that can be assessed by peer-reviewers in a deliberate manner.

***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 or 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 XII of the Application*)

The Department plans to use a peer 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 or DVD, 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. 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 monitored the application and review process and identified areas to reduce the burden for this competition, specifically the removal of the optional budget supplement, selection criterion (B)(5), and selection criterion (E)(4).

**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 anticipated program funds by December 31, 2013. The Department anticipates it would have to return authorized funds to the Treasury if it does not conduct this information collection.

**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 that 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.***

The public had an opportunity to comment during the regulatory process related to the proposed priorities. The Notice of Proposed Priorities was published in the Federal Register on April 16, 2013 (p. 22451 -22467) . A 30-day comment period was offered. Changes to the application package as a result of comments will be applied prior to publication of the final priorities.

***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 225 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 300 applications. We estimate the average total number of hours for all applicants to be (225 hours x 300 applications = 67,500 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 \$2,025,000 (\$30/hour x 67,500 hours = \$2,025,000).

<b>Application Section</b>	<b>Hours</b>
A. Vision	19
B. Prior Track Record of Success	18
C. Preparing Students for College and Careers	46
D. LEA Policy and Infrastructure	38
E. Continuous Improvement	28
F. Budget and Sustainability	52
Competitive Preference Priority (OPTIONAL)	9
Application Requirements	15
<b>Total</b>	<b>225</b>

**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
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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 utilize an existing contract for assistance with the application review. The cost of the FY 2012 grant review was approximately \$3,500,000. This amount paid for meeting space, contractual support, conference calls, printing, and mailing expenses, computer and printer rental, and peer reviewer expenses (travel, lodging, compensation, etc.). The contract for FY 2013 will be approximately \$3,384,000.

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

This is a revision to a collection for an existing program. In the previous fiscal year (FY 2012) the Race to the Top – District competition generated significant interest from school districts, as 1,225 local educational agencies were part of 372 submitted applications. In FY 2013 we expect interest to subside slightly and anticipate 300 applications. In addition, the only substantive changes to the application are the exclusion of the optional budget supplement, selection criterion (B)(5), and selection criterion (E) (4), which decreases the burden per application from 238 to 225, for a total of 67,500 burden hours. In total we expect 72 fewer applications and 21,036 less burden hours than the FY 2012 Race to the Top – District competition.

***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.