SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION

INVESTING IN INNOVATION (i3) GRANT PROGRAM

Justification:

1. **Explain the circumstances that make the collection of information necessary.**

   The Investing in Innovation (i3) Fund was established under section 14007 of the American Recovery and Reinvestment Act of 2009 (ARRA). Since this is a competitive program, the Department needs to collect applications in order to determine which eligible applicants should receive a grant award. The Department will make three types of awards under this program: Scale-up Grants, Validation Grants, and Development Grants. These grants will provide funding to support local educational agencies (LEAs), and nonprofit organizations in partnership with one or more LEAs or a consortium of schools to apply for funding to expand and develop innovate practices that can serve as models of best practices; allow eligible entities to work in partnership with the private sector and the philanthropic community; and identify and document best practices that can be shared and taken to scale based on demonstrated success.

2. **Indicate how, by whom, and for what purpose the information is to be used.**

   The information provided in the application will allow field readers and the Department of Education to determine if applicants are eligible and identify which applications qualify for funding. An additional part of the application consists of assurances regarding the applicant's compliance with applicable Federal laws and regulation in 34 CFR 76.132.

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.**

   Applicants are required to submit applications electronically to the U.S. Department of Education.
   All applicants are currently required to submit their applications electronically through Grants.gov.

4. **Describe efforts to identify duplication.**

   The information supplied by the applicant is not contained in any other data collection, and is unique to this program and the particular grantee. The application is a single document intended to serve a specific authorized purpose, and is in keeping with statutory requirements in 34 CFR 75.100.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

    Small businesses are not impacted by this data collection.

6. **Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently**

    The Department cannot distribute these grant awards to recipients without an application requesting the funds. If no application information were collected, the Department would not know which organizations want or merit funding.

7. **Explain any special circumstance that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.5.**

    There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

8. **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.**

    The Department has consulted with potential applicants, other interested organizations and entities to obtain their views on the availability of possible requested information and potential application processes for these grants. The Department published a 60-and 30-day Federal Register Notice with no comments.

9. **Explain any decision to provide any payment or gift to respondents, other than renumeration of contractors or grantees.**

    No gifts or payments will be made to application respondents other than the award to the grant recipient.

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

    There are no assurances of confidentiality provided to respondents.

11. **Provide additional justification for any questions of a sensitive nature**

There is no question of sensitive nature in this collection of information.

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

OII received approximately 1700 applications for the 2010 i3 grant competition. We originally anticipated that we would receive 2700 applications for the i3 grant therefore; OII has adjusted the expected applications to reflect the amount actually received and to account for the amount expected each year of the three year renewal. Although OII received approximately 1700 applications, OII has determined that for a three year renewal ED should account for an increase of 100 applications per year to reflect the expected 2000 applications.

During the FY2012 competition the decision was made to re-structure the Development competition to allow for an annual pre-application phase. This resulted in an increase in the number of applications received but it will ultimately decrease the net burden for all respondents. The following breakdown below details the change in burden.

Scale-up Grants:

Estimated data burden for Scale-up grants:

Annual reporting burden per response (preparing and submitting application):
120 hours x 100 applicants = 12,000 hours

Estimated respondent cost for Scale-up grants:

Estimated respondent cost for an application is based on 120 hours per application for Scale-up grants. The figure of 120 hours is based on our own experience and comments from eligible applicants that we consulted.

We estimate respondent cost at an average of $25 per hour so that the average cost per application would be $25 x 120 hours = $3000.

We expect to receive a total of 100 applications from eligible applicants. **Total estimated cost for Scale-up grants: $3000 x 100 applications = $300,000**

Validation Grants:

Estimated data burden for Validation grants:

Annual reporting burden per response (preparing and submitting application):
120 hours x 400 applicants = 48,000 hours

Estimated respondent cost for Validation grants:

Estimated respondent cost for an application is based on 120 hours per application for Validation grants. The figure of 120 hours is based on our own experience and comments from eligible applicants that we consulted.

We estimate respondent cost at an average of $25 per hour so that the average cost per application would be $25 x 120 hours = $3000.

We expect to receive a total of 500 applications from eligible applicants. **Total estimated cost for Validation grants: $3000 x 400 applications = $1,200,000**

Development Grants:

Estimated data burden for Development Pre-Application grants:

Annual reporting burden per response (preparing and submitting application):
30 hours x 1500 applicants = 45,000 hours

Estimated respondent cost for Development Pre-Application grants:

Estimated respondent cost for an application is based on 30 hours per application for Development grants.   The figure of 30 hours is based on our own experience and comments from eligible applicants that we consulted.

We estimate respondent cost at an average of $25 per hour so that the average cost per application would be $25 x 30 hours = $750.

We expect to receive a total of 1500 applications from eligible applicants.
Total estimated cost for Development Pre-Application grants: $750 x 1500 applications = $1,125,000

Estimated data burden for Development grants:

Annual reporting burden per response (preparing and submitting application):
60 hours x 200 applicants = 12,000 hours

Estimated respondent cost for Development grants:

Estimated respondent cost for an application is based on 60 hours per application for Development grants.   The figure of 60 hours is based on our own experience and comments from eligible applicants that we consulted.

We estimate respondent cost at an average of $25 per hour so that the average cost per application would be $25 x 60 hours = $1500.

We expect to receive a total of 200 applications from eligible applicants.
Total estimated cost for Development grants: $1500 x 200 applications = $300,000

Grand total for all (i3) grants:

Estimated overall data burden for all grants:

Annual reporting burden per response (preparing and submitting application):

Scale-up grants: 120 hours x 100 applicants = 12,000 hours
Validation grants: 120 hours x 400 applicants = 48,000 hours
Development Pre-Application grants: 30 hours x 1500 applicants = 45,000 hours
Development grants: 60 hours x 200 applicants = 12,000 hours
Total: 2200 applicants and 117,000 hours

Estimated overall cost burden for all grants:

Estimated cost for Scale-up grants: $3000 x 100 applications = $300,000
Estimated cost for Validation grants: $3000 x 400 applications = $1,200,000
Estimated cost for Development Pre-Application grants: $750 x 1500 applications =$1,125,000
Estimated cost for Development grants: $1500 x 200 applications = $300,000
Total: $2,925,000

13. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

    There are no startup costs to respondents.

14. **Estimated annualized Federal cost:**

    There will be at least10 program personnel dedicated solely to the i3 program along with an assigned contractor therefore $2,925,000 will be the estimated annual Federal cost. It was originally anticipated that ED would receive 2700 applications for the i3 grant with an estimated annualized Federal cost of $4,950,000 however;

the proposed changes to the structure of the Development competition will reduce the estimated annualized Federal cost by $2,025,000 to $2,925,000.

Scale-up Grants:

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We estimate respondent cost at an average of $25 per hour so that the average cost per application would be $25 x 120 hours = $3000.

We expect to receive a total of 100 applications from eligible applicants. **Total estimated cost for Scale-up grants: $3000 x 100 applications = $300,000**

Validation Grants:

Estimated data burden for Validation grants:

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120 hours x 400 applicants = 48,000 hours

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We expect to receive a total of 200 applications from eligible applicants.
Total estimated cost for Development grants: $1500 x 200 applications = $300,000

Grand total for all (i3) grants:

Estimated overall data burden for all grants:

Annual reporting burden per response (preparing and submitting application):

Scale-up grants: 120 hours x 100 applicants = 12,000 hours
Validation grants: 120 hours x 400 applicants = 48,000 hours
Development Pre-Application: 30 hours x 1500 applicants = 45,000 hours

Development grants: 60 hours x 200 applicants = 12,000 hours
Total: 2200 applicants and 117,000 hours

Estimated overall cost burden for all three grants:

Estimated cost for Scale-up grants: $3000 x 100 applications = $300,000
Estimated cost for Validation grants: $3000 x 400 applications = $1,200,000
Estimated cost for Development Pre-Application grants: $750 x 1500 applications =$1,125,000
Estimated cost for Development grants: $1500 x 200 applications = $300,000
Total: $ 2,925,000

15. **Explain the reasons for any program changes or adjustments reported in Items 13 or 14**

    There is a program change decrease of -33,000 total annual burden hours and an increase of +200 respondents. The collection document maintains the original scope, the questions asked have not changed, and the criteria, have been reduced to reflect the criteria specifically designated for the pre-application phase. During the FY2013and future competitions, applicants will be asked to submit an abbreviated version of the application, and as a result of these less stringent application requirements we anticipate an increase in the number of respondents, which will increase the burden. However following the initial review process, only entities that have submitted pre-applications that are scored highly by the peer reviewers will be invited to submit full applications, but other pre-applicants may submit full applications if they wish. Based upon the small number that will be invited to submit a full application, we anticipate a significant decrease in the burden as it is currently calculated, and we do not anticipate many pre-applicants who were not highly scored to submit full applications.

16. **For collections of information whose results will be published, outline plans for tabulation and publication.**

    The Department will make the following available to the public on the Department's i3 Web site:
    - A list of all applicants and their partners; the type of grant for which the applicant applied; and the requested budget, including the amount of funds requested for each partner;
    - All Scale-up applications with personally identifiable information and proprietary information identified by the applicant redacted;

- All successful Validation and Development applications with personally identifiable information and proprietary information identified by the applicant redacted; and
- Peer reviewer scores and comments (TRFs) for all successful applications.

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 information collection.

18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions form"

There is no exception to the "Certification for Paperwork Reduction Act Submissions"