

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 copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The collection of information is necessary in order to provide the public with one central point to obtain information about educational resource organizations. The directory avoids duplication and inconsistency on the Department's web site in various places where organizations are listed. It is necessary to maintain this directory by ensuring that the information it contains is up to date. Each of the organizations in the directory (almost 3,000) is sent a request once a year asking that they verify that its information is correct and current. It is also necessary to provide new organizations the opportunity to submit a request to be included in the directory. The EROD web site contains an online form (<http://www.ed.gov/erod>) so that any entities that are not in the directory, but would like to be, can request that their information be included.

Education Resource Organizations Directory (EROD), will only contain records from state and state sponsored agencies. EROD also contained records from non-profit and some for-profit organizations. By limiting records to only state and state sponsored agencies, EROD will reduce the number of requests for updates.

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 that is collected is used to update the directory. Teachers, librarians, students, researchers, and parents use the directory to identify and contact organizational sources of information and assistance on a broad range of education-related topics.

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.

Organizations in the directory that have provided an email address are sent an electronic notice by email once a year asking them to verify the information in the directory. These organizations have the ability to reply to the verification request by email or by using the online form found on the directory's web site. Any organizations that would like to be included in the directory can submit their information via email, the online form, phone, fax or regular mail.

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.

The Office of Communications and Outreach (OCO) only asks for this information through EROD. No similar information exists.

5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.

The collection of this information does not impact 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 verification of the information is not conducted at least annually, the data could become outdated and lead to the provision of inaccurate information to visitors to the Department's web site. Department offices that depend on EROD for their organization listings might resume maintaining their own lists, leading to increased redundancy.

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 special circumstances exist.

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.

Views about EROD from persons outside the agency are obtained via the ED Internet Customer Survey (<http://www.ed.gov/erod>). The 60 day notice was published on January 13, 2014 (79 FR 2160). No substantive public comments were received. A 30 day federal register notice will be published inviting public comment.

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

No payment or gift will be made to respondents.

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

No assurance of confidentiality is provided since this information is to be provided to the public and includes no privacy data. Organizations reply on a voluntary basis and personal information is limited to the name, phone number and email address of the designated individual at that organization that the public may contact.

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 collection does not include any 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, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 item 16 of IC Data Part 1.
- 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.

Estimates of the hour burden of the collection of information:

a) Annual Verification Request:

- Number of respondents to annual verification request: 1,700
- Frequency of response: Once a year
- Annual hour burden: 340 (The hour burden was estimated by reviewing a sample record and updating each field of information.)
- Annualized cost: \$8,500

b) New respondents to the Online Form:

- The number of new respondents to the online form: 100
- Frequency of response: Once
- Annual hour burden: 33.3 (The hour burden was estimated by completing each field of information on the online form. All subsequent submissions would be done using the form in 12 a).
- Annualized cost: \$832.50

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.

Total Annualized Capital/Startup Cost : \$.00
 Total Annual Costs (O&M) : .00

Total Annualized Costs Requested : \$.00

There are no associated 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 estimate for annual maintenance including requests for updates is \$8,500. This figure is based on 260 administrative hours per year at \$32 per hour.

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

This is a reinstatement of a previously approved ICR. There are no changes in burden and responses. This results in an increase in burden and responses of 373 hours and 1,800 responses.

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 information is reviewed upon receipt for accuracy and relevance, and then it is posted immediately to the website. The entire project cycle takes one year during which each record is verified and updated. The year begins on Jan. 1 and ends on Dec. 31.

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.

This approval is not being sought.

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

There are no exceptions to the certification statement.