

PRESCHOOL DEVELOPMENT GRANTS

DEVELOPMENT GRANT COMPETITION

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

Q1. 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 section. 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.

A1. The Preschool Development Grants program is authorized under sections 14005 and 14006, of the American Recovery and Reinvestment Act of 2009 (ARRA) (Pub. L. 111–5), as amended by section 1832(b) of Division B of the Department of Defense and Full-Year Continuing Appropriations Act, 2011 (Pub. L. 112–10), the Department of Education Appropriations Act, 2012 (Title III of Division F of Pub. L. 112–74, the Consolidated Appropriations Act, 2012), and the Department of Education Appropriations Act, 2014 (Title III of Division H of Pub. L. 113–76, the Consolidated Appropriations Act, 2014). The Preschool Development Grants competition will be jointly administered by the U.S. Departments of Education and Health and Human Services (ED, HHS, or Departments).

Recent and longstanding research indicates that children who attend high-quality preschool programs achieve significant, positive short- and long-term outcomes, and the return on investment that results from attending high-quality preschool programs is overwhelmingly clear. There is tremendous unmet need for high-quality early learning programs. Only 40 percent of eligible children have access to Head Start. Less than one-third of all four-year-olds are enrolled in State-funded preschool programs.

All States, the District of Columbia, and Puerto Rico will be eligible to apply for one of two proposed types of discretionary grants: Development Grants and Expansion Grants. States with small or no State-funded preschool programs will be eligible to apply for Development Grants. We have submitted a separate information collection request for the Expansion Grants application. We intend for high-quality preschool programs to be located in regionally diverse communities or consortia of communities in cities, towns, counties, neighborhood, districts, rural or tribal areas, with a high level of need or distress as determined by the State. Preschool programs funded under either category of the Preschool Development Grants will need to meet the competition’s criteria for high-quality preschool programs. Other preschool programs within the State will not be required to meet these criteria.

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Preschool Development is a new discretionary grant and the data collection requirements are in draft form.

Q2. 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.

A2. The U.S. Departments of Education and Health and Human Services (ED, HHS, or Departments) will use the information submitted by SEAs in the application for the PDG-Expansion Grants to select applicants for funding under this program. The Preschool Development Grants competition will be jointly administered by the Departments. This is a new collection.

Q3. 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.

A3. All applicants will use Grants.gov, an Internet-based collection system, to submit their applications electronically to the Department.

Q4. 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.

A4. The Preschool Development Grant application does not duplicate any other information collection effort.

Q5. 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.

A5. This collection of information does not impact small businesses. Small entities are not affected by this collection since applicants are SEAs.

Q6. 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.

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A6. The Preschool Development grants program is a discretionary grant program. The program could not be implemented without the collection of information. Not obtaining this data in the State's application would leave reviewers without the information required to determine if a State's application fulfills the requirements of the grant application. The data collection occurs only when applications for new grants are solicited, no more than once a year.

Q7. *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.*

A7. None of the special circumstances listed apply to this data collection.

Q8. *As applicable, state that the Department has published the 60 and 30 day 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,

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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.

A8. Pursuant to 5 CFR 1320.13, the Departments are requesting that the Office of Management and Budget (OMB) clear the applications on an emergency basis. The funds for this program expire on December 31, 2014; therefore if we followed the standard clearance process there would not be enough time to get approval of the application packages, hold a competition, and make awards.

ED/HHS was interested in public input so a blog was created and we received over five hundred comments. ED/HHS have considered these ideas, suggestions, and comments in developing the draft requirements, priorities, selection criteria, and definitions in the executive summary for each of the Development Grants competition and the Expansion Grants competition, which are now posted for review and comment by the public. In commenting on these documents, we encouraged potential applicants to identify potential barriers and challenges that may impede implementation of an ambitious and achievable, high-quality State plan.

These documents were posted for public input until Friday, May 16, 2014, at which time the input section was closed and we considered comments received as we developed final requirements, priorities, selection criteria, and definitions.

On May 12, 2014, ED/HHS conducted a webinar for interested applicants. The purpose of the webinar was to review the executive summaries for the Development and Expansion grants. Further information will be posted on the Preschool Development Grant Web page at www.preschooldevelopmentgrants.

Q9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.

A9. No payment or gifts to respondents will be made.

Q10. 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.¹ If the collection is subject to the

¹ 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

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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.

A10. There is no assurance of confidentiality.

Q11. 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.

A11. There are no questions of a sensitive nature.

Q12. 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 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.*

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)

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A12. All Preschool Development grant applicants will be asked to complete the Preschool Development grant application. We estimate that the application to take an average of 200 hours for an applicant to complete. The average burden for completing the one-time grant application for approximately 16 States is 3,200 hours. The cost to respondents is estimated to be \$43 per hour for a total cost to respondents of approximately \$137,600.00 for each application. The hour burden on respondents is not expected to vary as there is only one version of the Preschool Development Grants 2014 Development Grant Application.

Approximately 16 respondents x 200 hours x \$43/hour = \$137,600.

Preschool Development Grants	Number of SEA applicants	Hours/Activity	Total Hours	Cost/Hour	Cost
Complete Preschool Development Grants – Development grant application	16	200	3,200	\$43	\$137,600.00
Total			3,200	\$43	\$137,600.00

Q13. 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.*

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- *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
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Total Annualized Costs Requested	: \$0

A13. There are no startup or recordkeeping costs associated with this collection.

Q14. 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.

A14. It is estimated that one half-time GS-14 oversees the competition efforts and represents ED in pre- and post-competition public and governmental meetings, and responds to public questions and concerns. One full-time GS-13 is the competition manager and responsible for the day-to-day competition work. Two part-time GS14s and one part-time GS9 employees review and prepare task-specific competition documents. A total of 2,143.26 hours is spent on this effort. The total personnel cost for 2,143.26 hours of staff time equates to \$57,902.54.

The Federal costs will involve screening the applications, managing the grant review, reviewing the budgets, and awarding Preschool Expansion Grants.

Contractor costs for the FY 14 competition are set by a firm fixed price logistics contract. The contractor will assist with the application review. The value of the grant review is expected to be approximately \$1,000,000.00. The calculation includes the review costs associated with the Preschool Development grants competition. The total includes costs for contractual support, conference calls, printing, and mailing expenses, computer and printer rental, reviewer expenses (printing, honoraria, etc.).

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Preschool Development Grant - Expansion Grant/Program Staff time - October 2014 - December 2014	
3 GS-14s x \$57.86/hour x 185.64 hours x 3 months	\$48,335.09
1 GS-13 x \$43.00/hour x 135 hours x 3 months	\$8,707.50
1 GS-9 x \$25.48/hour x 22.5 hours x 3 months	\$859.95
Total Federal Personnel Costs	\$57,902.54
Logistics Contract	\$1,000,000.00
Grand Total	\$1,057,902.54

Q15. 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).

A15. This request is for a new grant program, there is a program change increase of 3,200 annual burden hours.

Q16. 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.

A16. There are no plans to formally publish the results of the data provided in the grant applications. Rather, the data obtained through this data collection will be used by the program office for a PDG discretionary grant competition.

Q17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

A17. All data collection instruments will include the OMB expiration date.

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Q18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

A18. No exceptions are requested.