

**SUPPORTING STATEMENT
NATIONAL BLUE RIBBON SCHOOLS PROGRAM**

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 National Blue Ribbon Schools Program honors public and private elementary, middle and high schools where students achieve at high levels or where the achievement gap is narrowing among all student subgroups. Each year since 1982, the U.S. Department of Education (ED) has sought out schools where students attain and maintain high academic goals, including those that beat the odds.

The Program, part of a larger ED effort to identify and disseminate knowledge about best school leadership and teaching practices, is authorized by Public Law 107-110 (January 8, 2002), Part D—Fund for the Improvement of Education, Subpart 1, Sec. 5411(b)(5) and administered in the U. S. Department of Education by the Office of Communications and Outreach's Recognition Programs unit.

Before selecting National Blue Ribbon Schools, the Department asks for nominations from the top education official in every state, the District of Columbia, and Puerto Rico, the Department of Defense Education Activity and the Bureau of Indian Education. The Council for American Private Education (CAPE) nominates private schools. A total of 413 schools nationwide are nominated, based on the number of K-12 students and the number of schools in each jurisdiction. The schools are invited by the Secretary of Education to submit an application for possible recognition as a National Blue Ribbon School.

Public and private schools are recognized based on one of two criteria: 1) Schools whose students are high performing. These are schools ranked among each state's highest performing schools as measured by their performance on state assessments or, in the case of private schools, that score at the highest performance level on nationally normed tests; or 2) Schools with at least 40 percent of their students from disadvantaged backgrounds that improve student performance to high levels as measured by the school's performance on state assessments or nationally-normed tests.

The National Blue Ribbon Schools Award is designed to bring public attention to the best schools in the United States and recognize those schools whose students thrive and excel. In 2002, the program was restructured to bring it in line with the No Child Left Behind Act, which placed a stronger emphasis on assessments and required schools to use data to demonstrate high academic success. Schools must show how they understand and use data and how leadership, curriculum, instruction, professional development and student support leads to student success.

- 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 from nominees for the National Blue Ribbon Schools award will be used by the Department, State Departments of Education, and the public. The information gathered from the applications will be used to recognize exemplary schools that are achieving at high levels and narrowing the achievement gap. The schools are recognized by the Secretary of Education and presented as models for other schools.

- 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.**

All applications are submitted electronically. The use of information technology has a minimal impact on the nominees and does not increase the burden for the nominees. The Department requests only one paper copy of the cover sheet because it contains the signatures of the principal, superintendent and school board chairperson. This is to ensure the above mentioned personnel understand and support the nomination of the school.

- 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 instructions are designed to seek only information necessary to identify those schools that will receive the award.

On page 8 of the application (cover sheet), the request for information is not duplicative. Since the Department's available data are at least one year old, it is important for the program to know the names, phone and fax numbers, e-mail address, and WEB page URL of the applicants. It is also important for the

program to know the district telephone number. This information is necessary for communicating with the schools and for answering questions from the Congress and the press about the awardees.

On page 9, numbers 1 through 10 allow the Chief State School Officers (CSSOs), schools and districts to be aware of the eligibility requirements for schools prior to receiving recognition by the Secretary of Education.

On pages 10 to 13, the questions have been designed to make the smallest demands possible on the schools preparing an application. If these schools will serve as models, it is important for people in other schools to know of a school's demographics.

Number 1 places the school in the context of the district. Number 2 is important because it gives a picture of the financial situation at the school.

Number 3 presents basic data on the demographic composition of the area in which the school is located. Congress routinely requests such data. Number 4 gives insights into the continuity of leadership within the school. Number 5 gives the enrollment for each grade.

Number 6 provides insights into the difficulties or opportunities a school may have because of the numbers of students from different ethnic backgrounds. Numbers 7 through 10 serves the same basic purpose concerning student turnover, limited English proficient students, the socioeconomic background of the school's students, and the numbers of students receiving special education services.

Numbers 11 and 12 ask for numbers that allow for a determination of the ratios of administrators and support personnel to teachers and teachers to students. Number 13 supplies information about attendance and graduation rates and allows for studies concerning the relationship of these data to student outcomes. Number 14 asks for information on post-graduation activities for high schools that allow for comparisons of these data to student outcomes.

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 information does not involve or impact small business 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.

The information collection is necessary to conduct the annual recognition of National Blue Ribbon Schools. If information is not collected, the Department will not be able to fulfill the requirements of Public Law 107-110 (January 8, 2002), Part D—Fund for the Improvement of Education, Subpart 1, Sec. 5411(b)(5).

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.**

This collection will be conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

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 current National Blue Ribbon Schools Program application was modified and simplified from a previously approved application for the National Blue Ribbon Schools Program. The Department consults extensively each year with the states, with the Council for American Private Education (CAPE) and with the schools that receive the award concerning the program and application. A 60 day notice was published on November 18, 2014 (79 FR 68671). No public comments were received. A 30 day notice was published.

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

Schools recognized as National Blue Ribbon Schools by the U. S. Secretary of Education receive a plaque and a flag as symbols of their designation. They are non-monetary awards and symbols that rewards excellence in schools.

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.

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.

No information of a sensitive nature is collected.

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.

The maximum number of respondents is 413. Each state, DC, DoDEA and BIE is assigned a number of nominees based on the school age population and number of schools in the state. Private schools are assigned a total of 50 schools. The table below shows the number of nominations allowed for each state:

Total Number of Public and Private Schools: 413

Alabama	5		New Hampshire	3
Alaska	3		New Jersey	9
Arizona	5		New Mexico	3
Arkansas	4		New York	19
California	35		North Carolina	9
Colorado	5		North Dakota	3
Connecticut	4		Ohio	14
Delaware	3		Oklahoma	6
District of Columbia	3		Oregon	4
Florida	13		Pennsylvania	13
Georgia	8		Rhode Island	3
Hawaii	3		South Carolina	5
Idaho	3		South Dakota	3
Illinois	16		Tennessee	6
Indiana	8		Texas	26
Iowa	5			
Kansas	5			
Kentucky	5			
Louisiana	6			
Maine	3			
Maryland	6			
Massachusetts	7			
Michigan	13			
Minnesota	8			
Mississippi	4			
Missouri	8			
Montana	3			
Nebraska	4			
Nevada		3		

Utah	3	Wisconsin	8
Vermont	3	Wyoming	3
Virginia	7	Puerto Rico	3
Washington	7	DoDEA	1
West Virginia	3	BIE	1
		Private Schools	50

- **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.**

It is estimated that it would take the respondents approximately 40 hours to complete the school application, including the information section, the test results, and the narrative sections. The total reporting burden hours and responses is 16,520 hours and 413 responses.

The cost to the respondents is approximately \$1,619.20 an estimated hourly wage of \$40.48 times 40 hours per respondent.

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:

Total Annual Costs (O&M) :

Total Annualized Costs Requested : _____

There are no costs to the respondents other than the cost of completing the application package.

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.

Based on the FY 2011 budget request, the annualized cost to the Federal government for operating the National Blue Ribbon Schools Program is \$951,783.24. A majority of the costs are contained in the technical assistance and support services contract. Other costs to the government, including mailings and printing are less than \$5,000.

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

This is an extension of a currently approved information collection request. Total burden hours and responses are 16,520 hours and 413 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 names of the award winning schools and their applications are posted on the U.S. Department of Education's website at <http://www.ed.gov/nationalblueribbonsschools> immediately following the designation by the U. S. Secretary of Education. The general schedule for the 2011-2012 cycle of the program is as follows:

- September 19, 2011:** The Secretary sends a letter of invitation to the Chief State School Officers (CSSOs), the Bureau of Indian Education (BIE), the Department of Defense Education Activity (DoDEA), and the Council for American Private Education (CAPE) requesting the submission of information for nominated schools.
- November 18:** Public school nominations from CSSOs, BIE, and DoDEA are due to the Department.
- December 3:** Private school applications due to CAPE.
- December 5:** The Department invites schools recommended by CSSOs, BIE, and DoDEA to apply for recognition as National Blue Ribbon Schools.
- January 2012:** CAPE selects its nominations.
- February 17:** Completed public and private school (from CAPE) applications are due to the Department.
- March:** Applications are reviewed for completeness and accuracy.
- April:** Applications are reviewed for compliance with eligibility criteria.
- August:** States certify that nominated public schools have made Adequate Yearly Progress (AYP).
- September:** The Secretary announces the 2012 National Blue Ribbon Schools.

November: Two representatives from each school, the principal and a teacher, attend the recognition ceremony in Washington, DC.

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 for OMB approval will be displayed.

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

No exceptions are sought.

**SUPPORTING STATEMENT PART B
FOR PAPERWORK REDUCTION ACT SUBMISSION**

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.