

**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 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<sup>1</sup>. 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.

**The Comprehensive Centers program awards no less than 20 grants to provide demonstrated expertise in technical assistance, professional development, and training to State educational agencies and local educational agencies regarding the administration and implementation of the Elementary and Secondary Education Act of 1965. The collection of information is necessary for eligible applicants to apply and receive grants under the Comprehensive Centers program. The information collection for fiscal year 2015 will solicit new information for the Comprehensive Centers competition in 2016 or 2017.**

**The Comprehensive Centers program is a discretionary grant program authorized under section 203 of the Education Technical Assistance Act of 2002 (ETAA).**

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 Department of Education (Department) will use the information collected to conduct a new Comprehensive Centers grant competition and award up to 16 regional comprehensive centers to support specific states and school districts within a geographical region and up to seven content centers. The last time this information was collected was in 2012; the previous collection resulted in the award of 22 comprehensive centers.**

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.

**The Comprehensive Centers program requires the electronic submission of applications. Applicants must submit their application electronically to the Governmentwide site Grants.gov. The Department will reject paper submissions unless an applicant qualifies for and requests one of the exceptions to the electronic submission requirements. All Department discretionary grants must submit applications through the Grants.gov portal.**

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<sup>1</sup> Please limit pasted text to no longer than 3 paragraphs.

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.

**In 2012, the Department awarded 15 Regional Comprehensive Centers and seven Content Comprehensive Centers. Each awarded Center received a five-year grant. The information collected in 2012 cannot be used or modified for the competition in fiscal year 2017.**

5. 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.

**The proposed priorities, requirements, and selection criteria impose no unique burden on small entities or small businesses. An eligible entity would evaluate the requirements of preparing an application and implementing a Comprehensive Center, including any associated costs, and weigh them against the benefits likely to be achieved by implementing a Center. An eligible entity would probably apply only if it determines that the likely benefits exceed the costs of preparing an application and implementing a project.**

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 collecting information for the Comprehensive Centers program would be that eligible entities would be unable to apply and receive up to 60 months of funding under this program and the Department would not fulfill its Congressional obligation. The information collection for new award recipients is conducted as infrequently as possible while still fulfilling its Congressional obligation.**

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.

**None of the special circumstances listed above apply. This collection is consistent with 5 CFR 1320.5.**

8. As applicable, state that the Department has published the 60 and 30 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, 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.

**This is a discretionary grant; the Department published the applicable 30-day Federal Register notice as required by 5 CFR 1320.8(d) and will address any comments received by the public.**

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

**No payments or gifts 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. 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.<sup>2</sup> If the collection is subject to the 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.

**There are no assurances of confidentiality.**

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.

**This collection does not include 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.

**In estimating the burden in this collection, the Department consulted with three previous grantees of the Comprehensive Centers program to determine the estimated time to complete an application. We estimate that each applicant would spend approximately 115 hours of staff time to address the proposed priorities, requirements, and selection criteria; prepare the application; and obtain necessary clearances. Based on the number of applications the Department received in the last competition it held under this program (in FY 2012), we expect to receive approximately 60 applications for these funds. The total number of hours for all expected applicants is an estimated 6,900 hours.**

- 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.

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<sup>2</sup> 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 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)

**The request for approval does not cover more than one form.**

- 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.

**The table below illustrates the estimates of annualized cost to respondents of the hour burdens for collections of information based on the GS hourly rates from the OPM Salary Table (2015-DCB).**

	<b>Number of Employees</b>	<b>Comparable GS-Grade</b>	<b>Hourly Rate</b>	<b>Number of Hours</b>	<b>Total Cost Per Entity</b>
	2	GS-15	\$60.49	60	\$3,629.40
	4	GS-12	\$36.60	40	\$1,464
	1	GS-7	\$20.63	15	\$309.45
Total	7			115	\$5,402.85

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.

**There are no costs that (a) meet the criteria for inclusion under this item; and (b) have not been addressed in either item #12 or item #14.**

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 tables below illustrate the estimates of annualized cost to the Federal government. A description of the method used to estimate cost is included below the related table. The estimate of the annualized cost to the Federal government is \$212,457.**

**ED Staff Time to update application and prepare clearance package**

	<b>Number of Employees</b>	<b>Comparable GS-Grade</b>	<b>Hourly Rate</b>	<b>Number of Hours</b>	<b>Total Cost</b>
	1	GS-15	\$60.49	7	\$423.43
	2	GS-12	\$36.60	16	\$585.60
Total	3			23	\$1,009.03

The estimate for staff time was calculated based on 23 total hours for staff to update and prepare clearance packages. The estimates are the hourly burdens for collections of information based on the GS hourly rates from the OPM Salary Table (2015-DCB). The calculation was based on the 23 hours of total staff time multiplied by the hourly rate of each respective staff member.

**ED Staff time to review applications**

	<b>Number of Employees</b>	<b>Comparable GS-Grade</b>	<b>Hourly Rate</b>	<b>Number of Hours</b>	<b>Total Cost</b>
	1	GS-15	\$60.49	100	\$6,049
	1	GS-14	\$51.43	100	\$5,143
	2	GS-12	\$36.60	200	\$7,320
Total	4			400	\$18,512

The estimate for staff time was calculated based on 400 total hours for staff to review applications. The estimates are the hourly burdens for collections of information based on the GS hourly rates from the OPM Salary Table (2015-DCB). The calculation was based on the number of hours multiplied by the hourly rate per staff member.

**Review Process of Applications**

<b>Activity</b>	<b>Calculation</b>	<b>Subtotal</b>
Mailing of grant applications	48 reviewers x 5 applications	\$1,200

to reviewers	x \$5.00 mailing cost	
Reviewer honoraria	48 reviewers x \$1200/reviewer	\$57,600
Off-site review of applications	48 reviewers x \$200x 3 apps	\$28,800
Extra applications	\$100 per extra application x 24 extra applications	\$2,400
Panel Chair honoraria	12 panel chairs x \$150 x 2 days	\$3,600
Reviewer Lodging	48 reviewers x \$222/night x 3 nights	\$31,968
Reviewer Per diem	48 reviewers x \$71/day x 2 days	\$6,816
Reviewer Per diem/travel days	48 reviewers x \$53.25 x 2 days	\$5,112
Reviewer Roundtrip travel	48 reviewers x \$900	\$43,200
Reviewer ground transportation	48 reviewers x \$100 x 2 days	\$9,600
Postage for application and return envelopes for signed forms	48 reviewers x \$30 per reviewer	\$1,440
Office expenses	48 reviewers x \$25 per reviewer	\$1,200
Total		\$192,936

The estimates reflect a projection of 48 reviewers for the competition. Each reviewer will receive an honorarium of \$1,200 for the review. Panel chairs will receive an additional \$150/day for each day of the review. The additional payment to the panel chair was based on previous competitions. Lodging and per diem costs were calculated based on FY 2015 rates for the District of Columbia. Roundtrip travel is based on the maximum possible amount for airfare.

**Estimated total cost to the Federal government: \$212,457.03**

The estimated total cost to the Federal government is the aggregate of the total estimated cost for ED staff to prepare the application package, the total estimated cost for ED staff to review applications, and the total estimated cost of the application review process.

15. Explain the reasons for any program changes or adjustments reported in Item 16 of IC Data Part 1.

**There is an adjustment reduction of -5 respondents and -4,540 annual burden hours. Reduction in burden is due to a lower estimate for the number of applicants as well as a reduction in the estimated number of hours required to prepare the application.**

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.

**There are no plans to publish the results of this data collection.**

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 Department is not seeking this approval.**

18. Explain each exception to the certification statement identified in the "Certification for Paperwork Reduction Act Submissions" Form.

**There are no exceptions to the referenced certification statement.**

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