

**STRIVING READERS COMPREHENSIVE LITERACY GRANT PROGRAM
[CFDA 84.371C]**

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
RIN Number: 1810-AB25**

A. Justification

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

The Striving Readers Comprehensive Literacy (SRCL) program is authorized as part of the FY 2010 Consolidated Appropriations Act (Pub. L. No. 111-117) under the Title I demonstration authority (Part E, Section 1502 of the Elementary and Secondary Education Act (ESEA)). SRCL is a comprehensive literacy development and education program to advance literacy skills for students, including limited-English-proficient students and students with disabilities, from birth through grade 12. Literacy skills include pre-literacy skills, reading and writing. This statute contains provisions for discretionary grant awards; this information collection is necessary to enable the Department to make grant awards.

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

Grant application reviewers will use the data reported in this information collection to analyze the extent to which the applicants will meet the literacy and pre-literacy needs of disadvantaged children from birth to grade 12. Additionally, program staff will use this information to respond to inquiries from Congress and the general public regarding effective literacy and pre-literacy interventions that are funded under this program. Information from the FY 2011 information collection was used to inform the new proposed priorities, requirements, definitions and selection criteria for FY 2016.

- 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, and the basis for the decision of adopting this means of collection. Also describe any consideration given to using technology to reduce burden.**

To reduce burden, all applicants will use Grants.gov, an Internet-based collection system, to submit their applications electronically to the Department.

- 4. Describe efforts to identify duplication.**

The SRCL application does not duplicate any other information collection effort. Furthermore, the Department reduces burden on respondents by allowing them to fulfill the requirement to develop a state comprehensive literacy plan by updating or revising an existing literacy plan to address the new priorities and requirements for this information collection.

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

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

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 SRCL program is a discretionary grant program. The program cannot be implemented without the collection of information. Not obtaining the data in the State's application would leave reviewers without the information required to determine if a State's application fulfills the statutory requirements of the grant application as well as the established priorities and requirements. The data collection occurs only when applications for new grants are solicited, no more than once a year.

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 apply to this data collection.

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.

The Department published Federal Register notices as required, to solicit comments and respond to any comments received. We will specifically address comments received on cost and hour burden.

Additionally, OAI will consult with SRCL grantees via webinars and other technical assistance meetings to gather information and data that may assist OAI in making any necessary revisions to this information collection in the future.

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

No payment or gifts to respondents will be made.

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

The Department makes no pledge about the confidentiality of the data.

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.

There are no questions of a sensitive nature.

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

SEAs are the only eligible applicants for competitive grants under SRCL. The current burden hour inventory for this program is 9600 hours (for 48 applicants). For FY 2016, the estimated number of burden hours will increase because of the new priorities, requirements and selection criteria that will be established for this program. As a result, we believe it will take an average of 240 hours (30 days) an SEA to complete and submit an application under this program, which accounts for the total number of days allowed for completing and submitting the application under this competition. Therefore, for the 52 States (including the District of Columbia and Puerto Rico), the total burden for completing this grant application is 12,480 burden hours. The respondent cost is estimated at \$40 per hour for each application. The total cost for approximately 52

respondents is \$499,200 (52 respondents x 240 hours x \$40/hour = \$499,200). Currently, this information collection will be required every 3 years for new competitions.

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

There are no additional respondent costs associated with this data collection.

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 Questions 12, 13, and 14 in a single table.

<i>Program Staff</i>	
2 GS-14 x \$65 x 600 hours	\$78,000
1 GS-13 x \$50/hour x 600 hours	\$30,000
TOTAL	\$108,000
<i>Application Review Costs</i>	
Alternates (for participation in Webinar training but not selected for review) (5@ \$500)	\$2,500
Honorarium for reviewers (30 @ \$2,000)	\$60,000
Honorarium for moderators (10 @ \$2,300)	\$23,000
TOTAL	\$85,500
GRAND TOTAL	\$193,500

There are no costs for printing or mailing the application package. The application package will be available through Grants.Gov and the Department’s website. The peer review will be conducted entirely online through G5 e-reader.

The annualized cost to the federal government is estimated to be \$193,500.

The cost estimate was determined using the following:

Two full-time GS-14 and one GS-13 staff member are projected to work on this effort for fifteen weeks. A week is based on a forty hour work week. The hourly wage used to figure the total labor costs for the Department of Education was based on the GS wage rate schedule provided by the Office of Personnel Management. The application review costs were determined using data from previous OAI competitions.

15. Explain the reasons for any program changes or adjustments.

There is a program change increase of 12,480 annual burden hours; adjustments in burden hours were required because of program changes that will require respondents to address new priorities, requirements and selection criteria. The program changes resulted from actions taken to align SRCL initiatives with the national policies for advancing literacy and pre-literacy skills in disadvantaged children.

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 formally publish the results of the data provided in the grant applications.

- 16. 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.**

- 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.**

All data collection instruments will include the OMB expiration date.

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

There will be no exceptions to the certification statement in the Certification of Paperwork Reduction Act.