

RACE TO THE TOP EARLY LEARNING CHALLENGE GRANT PROGRAM

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

INTRODUCTION

Supporting America's youngest learners and helping ensure children, especially high need young children (e.g. those who are low-income, English learners, and children with disabilities or developmental delays), enter kindergarten ready to succeed in school and in life is a critical focus of the Obama Administration in Fiscal Year (FY) 2013. A robust body of research demonstrates that high-quality early learning and development programs and services can improve young children's health, social emotional and cognitive outcomes, enhance school readiness, and help close the wide school readiness gap that exists between children with high-needs and their peers at the time they enter kindergarten.

To address this school readiness gap, the Administration has identified, as high priorities, strengthening the quality of early learning and development programs and increasing access to high-quality early learning programs for all children, including those with high-needs. This commitment to early education is reflected in the Race to the Top - Early Learning Challenge (RTT-ELC) program.

On May 25, 2011, Secretaries Duncan and Sebelius announced the RTT-ELC, a \$500 million State-level grant competition held in FY 2011 and authorized under the American Recovery and Reinvestment Act of 2009 (ARRA), as amended by section 1832(b) of the Department of Defense and Full-Year Continuing Appropriations Act, 2011. The Departments administered this competition jointly.

The purpose of the RTT-ELC program is to improve the quality of early learning and development and close the achievement gap for children with high-needs. This program focuses on improving early learning and development for young children by supporting States' efforts to increase the number and percentage of low-income and disadvantaged children, in each age group of infants, toddlers, and preschoolers, who are enrolled in high-quality early learning and development programs; and designing and implementing an integrated system of high-quality early learning and development programs and services.

At its core, RTT-ELC demonstrates a strong commitment by the Administration to stimulate a national effort to make sure all children enter kindergarten ready to succeed. Through the RTT-ELC, the Administration seeks to help close the achievement gap between children with high needs and their peers by supporting State efforts to build strong systems of early learning and development that provide increased access to high-quality programs for the children who need it most. The FY 2013 RTT-ELC competition represents an unprecedented opportunity for States to focus deeply on their early learning and development systems for children from birth through age five. It is an opportunity to build a more unified approach for supporting young children and their families--an approach that increases access to high-quality early learning and development programs and services, and helps ensure that children enter kindergarten with the skills, knowledge, and dispositions toward learning they need to be successful.

The RTT-ELC grant program does not create new early learning and development programs, nor is it a vehicle for maintenance of the status quo. Rather, the RTT-ELC program will support States that demonstrate their commitment to integrating and aligning resources and policies across all of the State agencies that administer public funds related to early learning and development. It will further provide incentives to the States that commit to and implement high-quality early learning and development programs statewide.

Current State early learning and development systems

Many early learning and development programs and services co-exist within States, including Head Start/Early Head Start programs, the Child Care and Development Fund (CCDF) program (pursuant to the Child Care and Development Block Grant Act (42 U.S.C. 9858 et seq.)), State-funded preschool, programs authorized under section 619 of part B of the Individuals with Disabilities Education Act (IDEA) and part C of IDEA, and other State and locally supported programs. Each of these programs has its own funding stream and accompanying requirements, standards, expectations, policies, and procedures. Each also has its own unique strengths and makes unique contributions to young children and their families. For States, the challenges to be addressed by RTT-ELC are to sustain and build on the strengths of these programs, acknowledge and appreciate their differences, reduce inefficiency, improve quality, and ultimately deliver a coordinated set of services and experiences that support young children's success in school and beyond.

The Departments have made awards in FY 2011 to nine RTT-ELC in Phase 1 and five awards in FY 2012 to Phase 2 grantees.

The FY 2013 RTT-ELC competition intends to build on President Obama's goal to support America's youngest learners "helping to ensure that children, especially young children with high-needs, such as those who are low-income, English learners, and children with disabilities or developmental delays, enter kindergarten ready to succeed in school and in life."

A. JUSTIFICATION

1. Explain the circumstances making the collection of information necessary.

Sections 14005 and 14006, Division A, of the American Recovery and Reinvestment Act of 2009, as amended by section 1832(b) of Division B of P.L. 112-10, the Department of Defense and Full-Year Continuing Appropriations Act, 2011, and the Department of Education Appropriations Act, 2012 (Title III of Division F of P.L. 112-74, the Consolidated Appropriations Act, 2012) authorizes the Race-to-the-Top Early Learning Challenge (RTT-ELC) grant program. Furthermore, Section 14005 requires that Governors submit applications containing information that the Secretary requires in the form of an application. The application is required by statute to include assurances; baseline data that demonstrates the State's current status in each of the areas described in the assurances; and a description of how the State intends to use it allocation.

The U.S. Department of Education's (ED) Office of Elementary and Secondary Education (OESE) developed an application with the U.S. Department of Health and Human Services (HHS) for a new RTT-ELC competitive grant competition. RTT-ELC is jointly administered by ED and HHS. The purpose of the program is to improve the quality of early childhood programs and to close the achievement gap for high-need children. The RTT-ELC grant competition focuses on improving early learning and

development programs for young children by supporting States' efforts to: (1) increase the number and percentage of low-income and disadvantaged children in each age group of infants, toddlers, and preschoolers who are enrolled in high-quality early learning programs; (2) design and implement an integrated system of high-quality early learning programs and services; and (3) ensure that any use of assessments conforms with the recommendations of the National Research Council's reports on early childhood. States will be encouraged to transition early learning programs to high quality levels focused on producing successful outcomes for all children and to increase access to quality programs for high-need children, as well as engage families and invest in improving, supporting and developing their early childhood education workforce.

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

The information collected is in the form of a single application submitted by States. A State must submit to ED an application that provides the following information:

- Application Assurances: Include the signature of the Governor or authorized representative and signatures of all Participating Agencies.
- Assurances: Accountability, Transparency, Reporting Assurances and Other Assurances and Certifications.
- Selection Criteria
- Competition Priorities
- Budget Part I: Summary Tables and Narrative
- Budget Part II: Participating Agency-level Budget Tables and Narrative
- Indirect Costs

The information provided through this collection will be used by application reviewers to assess the applicant's proposal and make funding decisions.

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 adoption this means of collection. Also describe any consideration of using information technology to reduce burden.

The information requested under this collection will be collected in hard copy and via CD or DVD. Applicants must mail or hand-deliver their applications on CD or DVD and submit hard copies of the original signed forms required in the application. ED determined hard copy was the best form of application submission due to the unique information that needs to be collected under this grant program. Using a standard electronic submission process would have made it more difficult for States to provide this information. The Departments expect no more than 38 applications under this collection, and therefore has sufficient capacity to deal with the number of paper-based submissions.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

The assurances and information requested under this collection are unique to the RTT-ELC program. Even in the event of similar or comparable information for other programs in the past, the assurances are specific to the RTT-ELC program and the information is specific to the present. Therefore, any comparable information and assurances that were collected in the past would not satisfy the requirements for this program.

ED has made every effort to reduce the burden on States in producing the information. The competition has been designed so that applicants will address selection criteria in two key areas, but applicants may choose to respond to selection criteria within the other three key areas; thereby minimizing burden and increasing State flexibility.

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

The Secretary certifies that this proposed action will not have a significant economic impact on a substantial number of small entities. The Secretary makes this certification because the only entities eligible to apply for grants are States and States are not 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 RTT-ELC program is a discretionary grant program. The consequence of not conducting the collection of information under the RTT-ELC application process would be that States would not be able to receive funds and the program could not be implemented for FY 2013. ED must conduct this collection in order to award all program funds by December 31, 2013.

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 that 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 which 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 is consistent with 5 CFR 1320.5.

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 CFT 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 Notice of Proposed Rulemaking, which also contains a request for public comment on the information collection, will be published in the Federal Register this spring. The program office expects a significant number of responses which will be considered in the development of the Notice Inviting Application and any revisions to the application package.

The program office established the estimated burden and costs for this information collection based on the 14 State respondents who have been funded to date. The application is structured to capitalize on the efforts States put into the previous application process; with virtually the same priorities, requirements, definitions, and selection criteria to minimize costs and burdens on State education administrations. States responses to the application process helped us determine our estimated costs and burden hours.

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

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, regulations, or agency policy.

There is no assurance 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. This 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.

There are no questions of a sensitive nature.

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

ED estimates that each State would spend approximately 225 hours of staff time to address the application requirements and criteria, prepare the application, and obtain necessary clearances. The total number of hours for the 38 States is an estimated 8,550 hours (36 unfunded States plus the District of Columbia and Puerto Rico) multiplied by 225 hours equals 8,550 hours. We estimate the average total cost per hour of the State-level staff who carry out this work to be \$30.00 an hour (based on the GS salary schedule for a GS12). The total estimated cost for all States would be \$256,500 (\$30.00 X 8,550 hours = \$256,500).

| | Hours |
|---|-------|
| A. Successful State System | |
| (A)(1) Articulating the State’s reform agenda and goals (status tables on children & programs) | 20 |
| (A)(2) Demonstrate past commitment and investment | 7 |
| (A)(3) Integrating and aligning work across the State (stakeholders, governance) | 14 |
| (A)(4) Developing a budget to implement and sustain the work | 33 |
| B. High-Quality, Accountable Programs | |
| (B)(1) Developing and adopting a common, statewide Tiered Quality Rating and Improvement System | 9 |
| (B)(2) Promoting participation in the State’s Tiered Quality Rating and Improvement System | 8 |
| (B)(3) Rating and monitoring Early Learning and Development Programs | 6 |
| (B)(4) Promoting Access to higher quality programs | 9 |
| (B)(5) Validating the State’s Tiered Quality Rating and Improvement System | 5 |
| (C) Promoting Early Learning and Development Outcomes for Children | |
| Section (C) Rationale | 5 |
| (C)(1) Developing and using statewide, high-quality Early Learning and Development Standards | 10 |
| (C)(2) Supporting effective uses of Comprehensive Assessment Systems | 7 |
| (C)(3) Identifying and addressing health, behavioral, and developmental needs | 7 |
| (C)(4) Engaging and supporting families | 5 |
| D. A Great Early Childhood Education Workforce | |
| Section (D) Rationale | 7 |
| (D)(1) Developing Workforce Knowledge and Competencies and a progression of credentials | 8 |
| (D)(2) Supporting Early Childhood Educators | 8 |

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| | |
| E. Measuring Outcomes and Progress | |
| Section (E) Rationale | 9 |
| (E)(1) Understanding the status of children at kindergarten entry | 8 |
| (E)(2) Building or enhancing an early learning data system | 8 |
| Application Requirements | |
| (a) Required signatures | 8 |
| (b) Develop MOUs with Participating State Agencies | 24 |
| (c) Budget (see (A)(4)) | See above |
| Total | 225 |

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

ED estimates that the per-hour cost at State level will average \$30 per person (approximately GS-12 equivalent) hour for a total of \$256,500 (= 225 hours x \$30 x 38 respondents).

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.

| | |
|--------------------------------------|--------------------|
| Program Staff | |
| 1 GS15 x \$56 x 650 hours | \$36,400 |
| 1 GS14 x \$40/hour x 980 hours | \$39,200 |
| 2 GS13 x \$34/hour x 500 hours | \$34,000 |
| 2 GS9 x \$24/hour x 500 hours | \$24,000 |
| | |
| Total Federal Personnel Costs | \$133,600 |
| Contract Costs | |
| Firm Fixed Price Logistics Contract | \$1,800,000 |
| | |
| Grand Total | \$1,933,600 |

The cost to the Federal government is approximately \$1,933,600 annually pre- and post- competition efforts.

It is estimated that one full-time GS15 oversees the competition efforts as Group Leader. The Group Leader oversees the competition with the assistance of a competition manager. The Group Leader represents ED in pre- and post-competition public and governmental meetings, responds to public and ED questions and concerns and facilitates the staff members' competition assignments. One full-time GS14 staff member acts as the competition manager and reports to the Group Leader as needed. This individual is also responsible for the day-to-day competition work. Two GS13 employees review and prepare task specific competition documents. A total of 3,630 hours is spent on this effort. The total personnel cost for 3,630 hours of staff time equates to \$133,600.

Contractor costs for the FY 13 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 \$1.8 million. The calculation includes the review costs associated with the RTT-ELC competition. The total includes costs for meeting space for the review, contractual support, conference calls, printing, and mailing expenses, computer and printer rental, reviewer expenses (travel, lodging, honoraria, etc.).

The total estimated Federal personnel and contract costs are \$1,933,600.

There are no annualized capital/startup costs for this collection; nor are there any operation and maintenance costs.

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

The program office is requesting a new OMB control number for this collection. The control number for the application for the RTT-ELC competition in 2011 (1894-0013) expired, and we did not renew it at the time because we did not know about future funding for the program. We have updated the application to address the proposed priorities, requirements, and selection criteria. The burden has been reduced from the previous competition because most states already have an early learning plan developed based on the previous competitions 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.

Some of the information collected in this grant application may be analyzed with performance data and shared on a government website such as ed.gov.

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 for Paperwork Reduction Act Submissions" Form.

ED is requesting an exception to the provision certifying a reduction in burden for small entities because the provision does not apply. The Secretary has certified in A.5 (above) that this proposed action will not have a significant economic impact on small entities because the only entities eligible to apply for grants are States and States are not small entities. Additionally, the provision for certifying the use of effective and efficient statistical survey methodology does not apply to this proposed action.