

RACE TO THE TOP - EARLY LEARNING CHALLENGE PROGRAM

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

OMB Number : 1810-0713

Revised 08/09/2016

INTRODUCTION

On May 25, 2011, Secretaries Duncan and Sebelius announced the Race to the Top – Early Learning Challenge (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 RTT-ELC program builds 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.” 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.

A. JUSTIFICATION

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

The Department of Education and the Department of Health and Human Services (Departments) are requesting renewal of the approval period for a currently-approved collection, an Annual Performance Report for its RTT-ELC grantees. The Departments made RTT-ELC awards to nine States in FY 2011, five States in FY 2012, and six States in FY 2013. This collection will serve as the Annual Performance Report only for the RTT-ELC grantees funded in FY 2012 and FY 2013, as the FY 2011 grantees will have completed their grants. This collection will occur in spring 2017 and spring 2018.

The information submitted in the Annual Performance Report is used to verify that grantees are making substantial progress toward the achievement of approved objectives. This grant awarded all funds up front, so the APR will not be used to determine continuation awards, but will be used to provide necessary performance information and data to program staff and to the public. Further, this APR form collects aggregate and quantifiable data needed to respond to the requirements of the Government Performance and Results Act (GPRA).

Information is collected under the authority of 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). (Attached is a copy of the authorizing statute.)

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

The Department will use the data collected to evaluate a grantee's accomplishments and to aid in compliance monitoring.

In addition, the annual performance reports are used to collect programmatic data for purposes of annual reporting; budget submissions to OMB; Congressional hearing testimonials; Congressional inquiries; performance measurement; and responding to inquiries from early childhood interest groups and the general public.

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 data being requested will allow the grantees to use computerized data systems to collect, retrieve, and report the requested information. The RTT-ELC program is currently using a web-based software application (GRADS 360) for program management and communication with Federal staff. A form will be developed for grantees to enter the data online and submit the entire report via the Internet.

The data collected consists of summarized information on project participants and services and are low-level security risk. Nonetheless, the web site is secured to ensure the data are only seen by authorized individuals and are protected from network hackers.

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 information submitted in this report is unique to each respondent: therefore no duplication exists as far as can be determined. There is no other collection instrument available to collect the information the Department is required to assess to determine grantees' program outcomes, as described in item 2 above.

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

The collection does not impact small entities because the only eligible grantees 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.

Collection of information is annual. Collection of information on a less frequent basis is not feasible. These reports are used to determine if the grantee is making satisfactory progress in meeting the goals and objectives, as proposed in its initial application. Without this data collection, the Departments will be unable to respond to the GPRA requirements, monitor grantee performance, and develop improved policies for program administration.

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 will not require any of the elements listed above.

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 Departments have conducted webinars each year with grantees to obtain their questions and input on the APR forms. In addition, project officers speak on a monthly basis with grantees, and these calls often include feedback about the APR. Finally, the Departments collect grantee feedback through the annual Grantee Satisfaction Survey. The Departments have used that feedback to make several

changes to the APR. This statement has been prepared for the initial Information Collection Request to renew this APR. This information collection renewal request will result in publication in the Federal Register of the information collection notice required by law.

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. Respondents will be informed that reports submitted under this collection will be made available to the public for transparency and accountability purposes.

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.

The APR form does not include questions about sexual behavior and attitudes, religious beliefs, or other items that are commonly considered sensitive and private.

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

The Department estimates that each State would spend approximately 120 hours of staff time to complete the annual performance report. The total number of hours for the 11 States is an estimated 1,320 hours. We estimate the average total cost per hour of the State-level staff who carry out this work to be \$33.72 an hour (approximately GS 12 Step 5 equivalent). The total cost for all States would be \$44,510.00 (=120 hours X \$33.72 X 11 States).

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

The Department estimates that the hourly cost at State level will average \$33.72 per person (approximately GS 12 Step 5 equivalent) for a total of \$44,510.00 (=120 hours X \$33.72 X 11 States).

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.

<i>Program Staff</i>	<i>Hours</i>	<i>Amount</i>
3 GS 13 x \$40.10/hour	30 (10 each)	\$1203.00

4 GS 14 x \$47.39/hour	40 (10 each)	\$1895.60
Total Federal Personnel Costs	70	\$3098.60
Printing (.05 ea. X 100 pages X 11 States)		\$55.00
Annual updates to web application, web-site hosting, help desk and data processing (contractor costs)		\$50,000.00
Grand Total		\$56,252.20

The annual cost to the Federal government is approximately \$53,153.60 annually for the review efforts.

It is estimated that one full-time GS 14 (the Office of Early Learning's Group Leader) will oversee the review efforts of the submitted APRs. An estimated 7 Federal staff members from both Departments will review and comment on the submitted APRs (including the Group Leader). A total of 70 hours is spent on this effort.

The total estimated personnel and printing costs are \$3,153.60.

There is an additional estimate of \$50,000 in contractor costs, to provide a web-based reporting system that includes maintaining the form, pre-populating data, assisting grantees with data entry, and generating reports.

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

There is an adjustment decrease of -1080 annual burden hours for this collection, and an adjustment decrease of nine respondents. Eleven grantees remain that will need to complete the report in spring, 2017. Slight, nonmaterial changes have been made to the budget section to accurately reflect that the document is collecting data on expenditures, not budget. There is no change in what the document will collect, which is grantee expenditure data by project and by category; these small changes are merely for clarification.

The Race to the Top - Early Learning Challenge program was first authorized in 2011 and made its first grant awards in December, 2011. The Departments collected performance data in February, 2013 from its first cohort of grantees without a collection approved by OMB, due to the small number of grantees (9). The APR was approved by OMB in 2013, with an expiration date of December 31, 2016. In spring 2017, 11 grantees will need to submit this report, necessitating renewal. The estimated pay rate that we use in this statement has increased slightly due to the assumption that pay rates have generally increased since this collection was previously approved. However, the total burden hours have decreased because 11 States will be reporting as opposed to the 20 states that were previously reporting.

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.

These reports will be made available to the public on www.ed.gov. Some of the information collected in this APR, such as performance data, will be analyzed and shared on www.ed.gov. No complex analytical techniques will be used.

17. 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.

Training on the collection will be provided each year between November and December. Reports will be collected at the end of February for the previous calendar year, and will be analyzed and reviewed between March and April. Reports will be posted between May and July of that year.

18. 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.

19. Explain each exception to the certification statement identified in the “Certification for paperwork Reduction Act Submissions” Form.

The Department is not requesting any exceptions. As we stated in A.5 (above), 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. The Department has reduced burden on small entities by virtue of the fact that we do not require any small entities to supply any information for this collection.