

## **SUPPORTING STATEMENT**

### **FOR PAPERWORK REDUCTION ACT SUBMISSION**

U.S. Department of Education Green Ribbon Schools Nominee Presentation Package

#### **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 Elementary and Secondary Education Act of 1965 authorizes the Secretary of Education (Secretary) to establish national recognition awards to improve academic achievement and community engagement, such as the National Blue Ribbon Schools Program (NBRSP) and U.S. Department of Education Green Ribbon Schools (ED-GRS). The authorizing statute is Public Law 107-110 (January 8, 2002), section 501, Innovative Programs and Parental Choice Provisions, which created Part D—Fund for the Improvement of Education, Subpart 1, Sec. 5411(b)(5), of the Elementary and Secondary Education Act of 1965 (20 U.S.C. § 7243(b)(5)).

Begun in 2011-2012, U.S. Department of Education Green Ribbon Schools (ED-GRS) is a recognition award that honors schools, districts, and postsecondary institutions that are making great strides in three Pillars: 1) reducing environmental impact and costs, including waste, water, energy use, and transportation; 2) improving the health and wellness of students and staff, including environmental health of premises, nutrition, and fitness; and 3) providing effective sustainability education, including STEM, civic skills, and green career pathways.

The award is a tool to encourage state education agencies, stakeholders and higher education officials to consider matters of facilities, health and environment comprehensively and in coordination with state health, environment and energy counterparts. In order to be selected for federal recognition, schools, districts and postsecondary institutions must be high achieving in all three of the above Pillars, not just one area. Schools, districts, colleges and universities apply to their state education authorities. State authorities can submit up to six nominees to ED, documenting achievement in all three Pillars. This information is used at the Department to select the awardees.

ED collects information on nominees from state nominating authorities regarding their schools, districts, and postsecondary nominees. State agencies are provided sample applications for all three types of nominees for their use and adaptation. Most states adapt the sample to their state competition. There is no one federal application for the award, but rather various applications determined by states. They do use a required two-page Nominee Submission Form as a cover sheet, which ED provides. This document, in school, district, and postsecondary submission formats is attached.

The burden varies greatly from state authority to authority and how they chose to approach the award.

The recognition award is part of a U.S. Department of Education (ED) effort to identify and communicate practices that result in improved student engagement, academic achievement, graduation rates, and workforce preparedness, and reinforce federal efforts to increase energy independence and economic security.

Encouraging resource efficient schools, districts, and IHEs allows administrators to dedicate more resources to instruction rather than operational costs. Healthy schools and wellness practices ensure that all students learn in an environment conducive to achieving their full potential, free of the health disparities that can aggravate achievement gaps. Sustainability education helps students engage in hands-on learning, hone critical thinking skills, learn many disciplines and develop a solid foundation in STEM subjects. It motivates postsecondary students in many disciplines, and especially those underserved in STEM subjects, to persist and graduate with sought after degrees and robust civic skills.

So that the Administration can receive states' nominations, ED seeks to provide the Nominee Presentation Form to states – essentially a cover sheet for states' evaluation of their nominees to ED – in three versions; one for school nominees, another for district nominees, and a third form for postsecondary nominees.

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.

ED requests information from state nominating authorities that have evaluated schools, districts, and/or postsecondary institutions according to the following categories: 1) reducing environmental impact and costs; 2) improving health and wellness; and 3) teaching effective environmental education. This information will be used at the Department to conduct final review to name the awardees annually.

A nominating authority is any one of the following:

- a Chief State School Officer (CSSO);
- the Department of Defense Education Activity (DoDEA); and
- the Bureau of Indian Education (BIE)
- State Higher Education Executive Officers

Nominating authorities submit according to the Nominee Submission Procedure, attached. They synthesize their evaluation of the nominee, convert it to a 508 compliant pdf, and submit it online to the Department by February 1st of each year. Honorees are announced each spring.

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 of using information technology to reduce burden.

ED-GRS has begun receiving states' nomination packages through [www.greenstrides.org](http://www.greenstrides.org). This site is maintained by ED. A password protected portion of the site, viewable only to nominating authorities, allows them to submit. Many states use online applications to select their nominees. This varies from state to state

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.

ED-GRS is the first comprehensive and coordinated federal policy in the three institutional roles of schools related to environment, health and education. The award acknowledges the work of schools in reaching high levels of achievement under three areas:

- o Reduced environmental impact and costs;
- o Improved health and wellness; and
- o Effective environmental education.

Through the award, ED encourages the critical collaborations that ensure all of our nation's schools are healthier, safer, and more sustainable. ED's complementary [Green Strides](#) initiative uses an annual report, blog, newsletter, social media and tour to facilitate the sharing of best practices and resources. In particular, the [Green Strides Webinar Series](#) and [resources](#) page help to provide all schools, districts and institutions of higher education free information on the tools that help them move toward the Pillars of the recognition award to follow the footsteps of the ED-GRS honorees. These resources pre-existed the award initiative, but are Green Strides the first time they have all been put in one place for schools to view. The award is not tied to any one program or standard, but instead encourages all schools, districts and institutions of higher education to use all of the many helpful resources available to them.

The initiative developed from an 80-entity signatory request, as well as from ED's interest in a coordinated, coherent federal policy regarding environment, health and education. It is the first of its kind.

Templates of sample applications, scoring rubrics, and press releases are provided to new states to avoid duplication of efforts on the part of Nominating Authorities, but they are adapt these or use their own language.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

To minimize burden, ED has simplified a range of requirements to be addressed in the applications from among the wide range of potential requirements and provided technical assistance to support the information collection request. These efforts include:

- ED provides sample applications for nominating authorities, should they wish to have model infrastructure on which to base their call for submissions, review and selection of nominees within their jurisdiction.
- Nominating authorities are asked to provide only documentary assessment, not on-site verification; this avoids a time-and-effort burden on states, districts, schools, and postsecondary institutions that would be associated with such on-site verification.
- ED-GRS provides technical assistance to schools, districts, and postsecondary institutions to support the dissemination of best practices and established metrics through its [Green Strides page](#).
- ED offers technical assistance calls for participating nominating authorities.
- Over the years, ED has encouraged states to simplify their application processes, recognizing that ED doesn't need reams of technical information to confirm their nominees, so long as they provide some explanation about work being done in every Pillar. In many cases, these nominees have already won private sector accolades in individual areas and can simply state what levels they have achieved in different national programs.

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.

If ED cannot collect information regarding the evaluation of schools nominated to ED, it will have no basis for recognizing U.S. Department of Education Green Ribbon Schools, District Sustainability Awardees, and Postsecondary Sustainability Awardees. Without the collection, the program is unfeasible.

In order that states may nominate candidates annually, ED must collect information annually for up to six nominees per state. This frequency cannot be reduced, although submission is totally voluntary and some states choose to submit fewer nominees. ED expects to continue to make awards annually.

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 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.

There are no special circumstances for this collection. Respondents submit information on a voluntary basis. Respondents are not required to retain records or submit statistical or confidential information or proprietary trade secrets.

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.

ED received significant public and federal agency input on the substance of the award. It has adapted the award based on input following each of the first six years.

Over the years and especially at the inception of the award, ED has consulted with and heard from the major education associations e.g. teachers, principals, school boards; states, e.g. chief state science officers and existing state green schools programs; national NGOs e.g. US Green Building Council, Earth Day Network, National Wildlife Federation, state- and locally-based initiatives; schools and school communities e.g. private, charter, tribal; technical experts e.g. architects and designers, academics, environmental and occupational health specialists; public, e.g. parents, teachers; and other federal agencies, including the U.S. Environmental Protection Agency, Department of the Interior, National Oceanic and Atmospheric Administration, the Department of Defense, Department of Energy, and US Department of Agriculture, among others.

ED also conducts an annual Green Strides Tour, during which it engages with many past honorees, future applicants, and state and local stakeholders. ED continues to receive high interest from the public that this recognition award continue.

A 60 day notice was sent to the Federal Register on November 24, 2017 (82 FR 55831). Three public comments were received and considered nonsubstantive to the request. A 30 day notice will be published.

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

This information collection does not involve payment or gifts of any kind.

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

Confidential information is not collected.

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 information collection does not include sensitive and/or private questions.

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.

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 13 of OMB Form 83-I.

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 not be included in Item 14.

### **Annual Burden Hours**

The burden is on two sectors: 1) the Nominating Authorities and 2) the applicants (schools, districts, and postsecondary institutions). The activities they conduct are described below, the estimated burdens for each provided separately, and the total burden then presented.

The Nominating Authorities refine their state-specific (or comparable authority-specific) application and nomination process, solicit applications, review applications, select nominees and submit documentation of evaluation of the nominees, along with a Nominee Presentation Form to ED. The schools, districts, and postsecondary institutions review the state-specific application form, collect information to complete the form, and complete and submit documentation to the Nominating Authority. Some states adapt from an ED-provided sample application and their own experience in previous years so that they are not creating their application from the ground up, leading to a decrease in burden decrease over time.

ED does not require a standardized application from all Nominating Authorities because state education agencies require flexibility on their evaluation of nominees to ED. For this reason, so long as state education authorities document evaluation in all three Pillars and all underlying nine Elements of the award, ED does not mandate state applications look a certain way. States have appreciated the flexibility and adapted their award to local needs. Furthermore, there is nothing in our criteria that requires

them to run a competition with application process, though nearly all are selecting nominees to ED oversee a competition that requires some sort of application.

For state nominating authorities, states develop applications and then prepare those into nominations to ED. In some cases, they turn applications over as-is to ED. In more cases, they work to synthesize and summarize. All Nominating Authorities now use an online submission which has them fill the name of the institution, address, basic demographic data, and contact information, in a form that takes no more than ten minutes per nomination. Up to 30 participating states nominate anywhere from 1-6 nominees, usually closer to 3.

The burden on the school, district, and postsecondary institution applicants also varies tremendously from state to state. Some states use their application as a teaching tool, and thus a self-audit, with numerous questions and requests for data. Others are now asking for three brief narratives, one for each Pillar of our award, and one summary narrative (more in line with ED's samples attached). So the burden on applicants to states could be anywhere from 8-25 hours, depending on the application route a state chooses. The number of applicants to states averages 10, with some states receiving 1 or 2 and others receiving as many as 50.

State nominating authorities spend 15 minutes submitting their online nominations through our online form which is very simple and brief.

The total burden for this activity is 22 hours (90 applications X 15 minutes per response).

The wage of the state employee doing this work varies greatly. Some states leverage the work of non-profits, who do this work free of charge to these state agencies. A wage of \$30 an hour is used in this calculation as an estimate.

Total costs related to this activity is \$13,500 (450 hours X \$30/hr).

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.

Total Annualized Capital/Startup Cost : \$ .00  
Total Annual Costs (O&M) : \$ .00  
Total Annualized Costs Requested : \$ .00

There are no such costs to 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.

The annual cost to the Federal government to implement this information collection is estimated at \$. This includes contractor beta testing and web site maintenance, and the salaries and expenses of program staff who manage the process and review the GRS data. The method used to estimate the annual cost is as follows:

Program Office Staff:  
\$50.49/hr X 350 hours = \$ 17,671

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is an extension of a previous approved information collection request. Burden and responses were adjusted to correct the estimate based on recent data and changes in process. This results in a reduction in burden of 4,671 hours and 1,413 responses. Total burden and responses is 1,350 hours and 30 responses respectively.

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.

We post the nomination packages of states' confirmed nominees on our [website](#) in the spring when we announce honorees. We also use the information they submit to develop a report, also posted on our website on our spring announcement of honorees day. This mainly involves editing narrative text. No complex analytical techniques are used.

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 OMB control number, expiration date, and related information will be displayed on the Nomination Presentation Form. We are not seeking this approval.

18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions are requested for this submission.

#### **B. Collection of Information Employing Statistical Methods**

The information collected will not employ statistical methods for gathering or analysis.