

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

- 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 section¹. 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.**

Each year since 1982, the U. S. Department of Education's National Blue Ribbon Schools Program has sought out and celebrated great American schools; schools that are demonstrating that all students can achieve to high levels. The purpose of the Program is to honor public and private elementary, middle and high schools based on their overall academic excellence or their progress in closing achievement gaps among student subgroups.

<https://www2.ed.gov/programs/nclbbrs/index.html>

The National Blue Ribbon Schools Program is designed to bring public attention to the best schools in the United States and recognize those schools whose students thrive and excel. The Program is part of a larger ED effort to identify and disseminate knowledge about best school leadership and teaching practices. The National Blue Ribbon Schools Program is administered in the U. S. Department of Education's Office of Communications and Outreach's State and Local Engagement Unit.

The National Blue Ribbon Schools Program was created by the second Secretary of Education, Terrel H. Bell, who was appointed by President Ronald Reagan. He is best known for commissioning the study on American education that resulted in the report, *A Nation at Risk*.

- 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 information collected from nominees for the National Blue Ribbon Schools award is used by the Department, State Departments of Education, and the public. The information gathered from the applications is used to recognize exemplary schools that are achieving at high levels and narrowing the achievement gap. The schools are recognized by the Secretary of Education and presented as models for other schools. <https://www2.ed.gov/programs/nclbbrs/index.html>.

¹ Please limit pasted text to no longer than 3 paragraphs.

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.**

All applications are submitted electronically. The use of information technology is efficient and has a minimal impact on the nominees. Collecting information electronically does not increase the burden for the nominees.

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.**

Every effort is made to avoid the duplication of information. The instructions provided to each applicant are designed to seek only information necessary to identify those schools that are eligible for the award.

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 collection of information does not involve or impact small business or other 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 information collection is necessary to conduct the annual recognition of National Blue Ribbon Schools. If information is not collected, the Department will not be able to identify and recognize exemplary schools that are demonstrating that all students can achieve to high levels.

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.**

This collection will be conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

- 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 current National Blue Ribbon Schools Program application was modified and simplified from a previously approved application for the National Blue Ribbon Schools Program. Each year, the Department consults extensively with representatives of state education agencies, the Council for American Private Education (CAPE), the Department of Defense Education Activity (DoDEA) and with nominated schools about the application and program requirements.

A 60 day notice was published on December 22, 2017 (82 FR 60217). No public comments were received. 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 with meaningful justification.

Schools recognized as National Blue Ribbon Schools by the U. S. Secretary of Education receive a plaque and a flag as symbols of their designation. They are non-monetary awards and symbols that rewards excellence in schools.

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.² 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.

No assurance of confidentiality is provided to respondents. The applications are in the public domain.

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.

No information of a sensitive nature is collected.

² 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)

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. 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.**

The maximum number of respondents each year is 420. Each state, DC, US Territories, DoDEA and BIE are assigned a number of school nominations based on the school age population and number of schools in the state. Non-public schools are assigned a total of 50 nominations.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**
- **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.**

It is estimated that it would take the respondents approximately 39.75 hours to complete the school application, including the information section, the test results, and the narrative sections.

Total burden for this information collection request is 16,800 hours and 420 respondents.

The average cost is approximately \$2018 per respondent. Details are as follows:

Labor Category	Number of Hours	Hourly Rate	Overhead	Fully Burden Rate	Total Cost
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Principal	17.85	\$54	30%	\$70	\$1,250
Teacher	17.85	\$30	30%	\$39	\$ 696
Administrative Staff	4.00	\$14	30%	\$18	\$ 72
Totals	39.75				\$2018

Source: <http://www.salary.com/category/salary>

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 acquiring and maintaining 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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12**

Total Annualized Capital/Startup Cost : _____
Total Annual Costs (O&M) : _____
Total Annualized Costs Requested : _____

There are no costs to respondents other than the estimated costs included in the burden of completing the application package.

- 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.**

Based on the FY 2017 budget request, the annualized cost to the Federal government for operating the National Blue Ribbon Schools Program is \$1,226,896.00. All the costs are contained in a technical assistance and support services contract for the Program.

- 15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).**

This is an extension of a previously approved information collection request. There was an increase of 7 respondents from the previous submission resulting in an increase in burden of 280 hours. This results in an adjustment of 3 responses and 280 burden hours. The total number of burden and responses is 16,800 hours and 420 responses.

- 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.**

The names of the award winning schools and their applications are posted on the U.S. Department of Education's website at <http://www.ed.gov/nationalblueribbonsschools> immediately following the designation by the U. S. Secretary of Education. The general schedule for the 2017-2018 cycle of the program is as follows:

- September, 2017** The Secretary of Education sends a letter of invitation to the and CAPE requesting nominations of eligible schools. Revised guidance will be attached.
- September, 2017** Conduct webinar/TA conference calls to review revised guidance with liaisons.
- November 30, 2017** Nomination processes and data for public schools being considered for nomination from CSSOs and interested non-public schools from CAPE are due to the Department.
- December 12, 2017** Nomination processes and data for public schools being considered for nomination are reviewed by ED and a NBRS Assessment Panel for alignment with the general eligibility criteria of the National Blue Ribbon Schools Program.
- December 19, 2017** Non-public school applications are due to CAPE.
- January 15, 2018** Approved public school nominations are entered by states into online portal.
- January 22, 2018** The Department invites public schools nominated by CSSOs to apply for recognition as National Blue Ribbon Schools.
- January 29, 2018** CAPE selects non-public school nominations.
- March 30, 2018** Completed public and non-public school applications are due to the Department.
- April-June, 2018** Applications are reviewed for completeness, quality and accuracy.
- August, 2018** States certify that nominated public schools have met all eligibility requirements.
- September, 2018** The Secretary of Education announces the 2018 National Blue Ribbon Schools (public and non-public).
- November, 2018** Two representatives from each school, the principal and a teacher, attend the recognition ceremony in Washington, DC.
- 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.**

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Revised: 12/14/2017

The Department is not seeking this approval.

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

There are no exceptions.