


MEMORANDUM

DATE: April 24, 2018

TO: Sharon Mar
Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)

THROUGH: Tomakie Washington
Information Collection Coordinator
Privacy, Information and Records Management Services
U.S. Department of Education (Department)

FROM: Margo Anderson 
Acting Assistant Deputy Secretary
Office of Innovation and Improvement

SUBJECT: Promise Neighborhoods Extension Grant Application – Request for Emergency Clearance

This is a request for emergency clearance of the funding announcement of the Promise Neighborhoods (PN) Extension Grant. The funding announcement is the instrument through which the Department will comply with the Consolidated Appropriations Act 2018 (the Appropriations Act) Public Law 115-141. The Appropriations Act directs the Department to make extension awards to fiscal year (FY) 2011 and FY 2012 Promise Neighborhoods (PN) implementation grantees. The Appropriations Act states that “...**no later than June 1, 2018** (emphasis added), the Secretary shall award extension grants under such section on a competitive basis to implementation grantees that have demonstrated the ability to collect, track, and report longitudinal data on Government Performance and Results Act indicators established by the Department and required to be reported on annually as part of the initial implementation grant; demonstrated the most positive and promising results during their initial implementation grant based on such indicators, emphasizing getting children ready to learn; demonstrated a commitment to operating in the most underserved and under-resourced, including rural, areas; and propose continuing to pursue ambitious goals during an extension of that grant.” In order to comply with the Appropriations Act the Office of Innovation and Improvement will need to design a program specific instrument to conduct a competition for the PN extension funds.

Pursuant to 5 CFR 1320.13, the Department requests that OMB review this information collection under its emergency procedures. This request for emergency clearance is based on missing a statutory deadline. The Appropriations Act requires that awards be made no later than June 1, 2018. The Appropriations Act became public law on March 23, 2018. There are 70 calendar days from March 23, 2018 to May 31, 2018. The June 1st date does not allow for a 30-day public comment period and 30-day OMB review period. We are also requesting no public comment period.

PN grantees provide a range of programs, services, and supports (collectively referred to as PN solutions) designed to improve educational and developmental outcomes of students from cradle-to-career continuum in our most distressed communities. PN implementation grants have provided schools with tutors, staff training, curriculum, materials, preschool and early learning opportunities, after and summer programming, and college and career programs. PN implementation grants also provided solutions targeted to student's families and the communities in which they live – responding to issues such as limited and low quality early childhood learning, increasing crime, limited access to healthy food (i.e. food deserts), inadequate housing, and high unemployment. Combined the FY 2012 and FY 2011 PN implementation grantees serve communities (where on average 40 percent of the population live below the federal poverty line) with nearly 80,000 children under 18 year of age and 85 schools enrolling over 41,000 students.

Several of the eligible applicants have shared with the Department and members of Congress the dire need for these funds to be awarded as soon as possible. These grantees explained that funds awarded under the initial PN implementation grant have been expended and they will need to close-out all grant operations in mid to late June without additional funds. While the potential award in September may provide additional funding, services provided to the pre-school and kindergarten through grade 12 students will be needed before the school year starts. An award in September would be especially disruptive for those grantees with year round school schedules, where school resumes for its students mid-July. One grantee, which is a subset of the twelve, reported that if extension funds are awarded after June 1st in addition to laying off 67 staff (employed by the grantee and its partners) the following supports and services will not be available at the after June:

- 74 slots for preschool;
- college preparatory supports to over 1,110 middle and high schools students;
- leadership development programming that provide 33 residents with professional development to support their community in creating better, healthier neighborhoods;
- supports such as tutoring, reading programs, and enrichment opportunities to over 6,000 elementary, middle and high students; and
- services of outreach specialists, Promotoras, who respond to families in need of assistance with food/nutrition, emergency shelter, counseling services, parenting classes, employment assistance. Promotoras have provided supports to nearly 600 students and their families.

Grantees also shared issues related to “re-starting” if funds are not received timely. The administrative burden to the grantee of “re-starting” the grant is further amplified in these distressed, low-resourced, and high poverty communities where issues like obtaining space and high qualified staff will not be easily resolved. Of particular concern is staff. Grantees explained that staff have developed strong, solid relationships with students, their families and the community. To receive funds after June will mean staff layoffs and it is not likely that these staff will be available to resume positions in September. A noted administrative burden is the recruiting, hiring, and training of new staff. Time to find equally qualified new staff will further delaying resuming disruptive services, supports, and programs.

Timeline

To allow for the Department to come within 10 business days of the statutory deadline of June 1, 2018 we are requesting an emergency clearance by April 26, 2018. If a funding announcement can be released on April 26, 2018 awards could be announced on June 15, 2018 and allows for:

- 28 calendar days for applicants to prepare and submit a response (April 26-May 23, 2018);
- 1 business day for ED to screen applications and assign to peer reviewers (May 24, 2018);
- 8 calendar days for peer reviewers to read, score, and participate in panel calls (May 25-31, 2018 – During this period staff will also review all budgets to ensure costs are allowable, allocable, and reasonable. Also, May 28th is a federal holiday);
- 2 business days for PN staff to develop a proposed funding slate (June 1-4, 2018);
- 4 business days for Department review and approval of proposed funding slate (June 5-8, 2018);
- 1 business day for ED to commit awards (June 11, 2018);
- 3 business days for Congressional notification (June 12-14, 2018); and
- 1 business day for ED to obligate awards and notify successful applicants (June 15, 2018).

The Department is requesting OMB approval by April 26, 2018.

Thank you for your prompt consideration of my request. If you have questions, please contact Elson Nash [202-260-2655] or Karen Dorsey Hargrove [202-453-6695] of my staff.