

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION  
OMB Number: 1810-0668**

**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 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 section. Please limit pasted text to no longer than 3 pages. 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.**

The purpose of the 21st Century Community Learning Centers (21st CCLC) program, as authorized under Title IV, Part B, of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act (ESSA) (20 U.S.C. 7171-7176)<sup>1</sup> is to create community learning centers that provide academic enrichment opportunities for children, particularly students who attend high poverty and low-performing schools, to meet State and local student standards in core academic subjects, to offer students a broad array of enrichment activities that can complement their regular academic programs, and to offer literacy and other educational services to the families of participating children. Present in all 50 states, the District of Columbia, Puerto Rico, US Virgin Islands, and the Bureau of Indian Education, academic enrichment and youth development programs are designed to enhance participants' well-being and academic success. In support of this program, Congress appropriated \$1,166,673,000 for 21<sup>st</sup> CCLC programs for fiscal year 2016 and \$1,191,673,000 for fiscal year 2017. Consisting of public and nonprofit agencies, community- and faith-based organizations, postsecondary institutions, and other community entities, 3,695 sub-grantees—operating 9,252 centers—provided academic and enrichment services and activities to over 1.8 million participants<sup>2</sup>.

The Department of Education (ED) is requesting authorization for an extension to collect data for 21<sup>st</sup> CCLC programs. This extension is being requested to authorize a revised data collection; there will be a reduction from the previous clearance with no new questions added. The core purpose is to collect information on the Government Performance and Results Act (GPRAs) performance indicators associated with the 21st CCLC program to report to Congress annually on the implementation and progress of 21st CCLC projects. All elements collected serve to meet the reporting requirements of the GPRAs. These metrics delivered in the form of an Annual Performance Report (APR) are the primary way the federal government determines the success and progress of the 21st CCLC program based on the statutory requirements. The data collection is necessary to allow ED

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<sup>1</sup> <https://www2.ed.gov/programs/21stcclc/legislation.html>

<sup>2</sup> Utilizing the fiscal year 2016 data, as data is still being collected for fiscal 2017 funding,

to collect information from states that directly administer the program and from the grantees to which the states have awarded the grants.

In 2014, the US Department of Education authorized the development of a new data collection system, 21APR, designed specifically to reduce the burden of entry for users and increase validity of the overall data. This revised collection streamlines the questions asked to focus on the GPRA indicators and participant demographics. This collection request represents a 88% reduction in elements from the previous collection and provides a more accurate representation of performance against the GPRA measure.

States are afforded the choice to report performance culled from grades, state assessments, and/or teacher-reported student behavior. Certain GPRA then seek data based on these instruments. The GPRA indicators are the primary means by which the US Department of Education measures the effectiveness and efficiency of the program based on the following two overall goals:

1. Participants in 21st Century Community Learning Center programs will demonstrate educational and social benefits and exhibit positive behavioral changes.
2. 21st Century Community Learning Centers will develop afterschool activities and educational opportunities that consider the best practices identified through research findings and other data that lead to high-quality enrichment opportunities that positively affect student outcomes.

Based on the goals and objectives of the 21st CCLC program, ED is seeking a renewal of approval to collect information to ensure compliance and gauge program impact. ED seeks to collect descriptive information about program operation from each grantee and their program centers. Also, ED seeks to collect center-level information on the characteristics of a given center; characteristics of feeder schools to the centers (the change in legislation now permits activities to occur at locations other than schools); center participation—including total numbers served and numbers of regular attendees (30 days or more); and aggregated student characteristics (racial, ethnic, gender makeup; special services or program and grade levels served).

In the areas of student achievement and behavioral change, proposed data-collection efforts are to result in at least one of the following pieces of information being collected from grantees:

1. Grades:
  - a. The percentage of all 21st Century regular program participants whose English grades improved from fall to spring.
  - b. The percentage of all 21st Century regular program participants whose mathematics grades improved from fall to spring.

2. State Assessments:
  - a. The percentage of elementary 21st Century regular program participants who improve from not proficient to proficient or above in reading on state assessments.
  - b. The percentage of middle/high school 21st Century regular program participants who improve from not proficient to proficient or above in mathematics on state assessments.
3. Teacher-reported improvement:
  - a. The percentage of all 21st Century regular program participants with teacher-reported improvement in homework completion and class participation.
  - b. The percentage of all 21st Century participants with teacher-reported improvements in student behavior.

Given that each state has created its own accountability structures for the 21st CCLC program, however, ED is requiring that grantees report on only one of the four listed student achievement and behavioral change areas listed.

The 21APR Data Guide, which outlines all data elements collected, is included in this package.

### **OMB Reporting History and Legislative Authority**

Clearance was granted for a revision of a currently approved collection by the States under OMB No. 1810-0668 through April 30, 2018. The web-based data collection will be primarily completed by state and subgrantee administrators of 21st CCLC programs. The legislative authority for ED to collect the data contained within the *Annual Performance Report* comes from the Education Department's General Administrative Regulation (EDGAR) and the 2010 Government Performance Results Modernization Act (GPRMA 2010), updating the Government Performance Results Act of 1993. GPRMA 2010, also referred to as "GPRMA" or "The Modernization Act," provides guidance for agencies to implement highly results-oriented Performance Management systems.

Under the Education Department's General Administrative Regulations (EDGAR, Section 75.720), grantees shall submit annual performance reports.

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 purpose of the information collected is to provide (1) a standard format for SEAs and their grantees to use in their annual reporting, which program officers will use to direct technical assistance, and (2) data to report to Congress on program indicators and ED goals.

The audiences for these data include:

- Congress, to monitor program progress
- ED program staff, to obtain descriptive information about the use of the 21st CCLC funds and respond to data calls from ED decision makers and Congress

- 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.**

The 21APR is a web-based system. Authorized users submit their center performance reports using this system. This is the most efficient way to collect and review performance reports at the center, grantee, and state level. It also allows for rapid dissemination of data collected as it is collected via the web-based system and stored in a secured database. ED staff can access the data at any time to respond immediately to Congress. Select data elements are made available to authorized state users via the web-based application.

- 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 Question 2 above.**

The 21APR reporting system collects performance data from states and their grantees and is the only mechanism by which data are collected on a national basis to produce an annual performance report to Congress on the status of all 21st CCLC programs. The information is not collected by any other means to report to the federal government; therefore, there is no duplication.

- 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 does not impact small businesses 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 core purposes of 21APR is to collect information on the Government Performance and Results Act (GPRA) performance indicators associated with the 21st CCLC program to report to Congress annually on the implementation and progress of 21st CCLC projects. All elements collected serve to meet the reporting requirements of the GPRAs. These metrics delivered in the form of an Annual Performance Report (APR) are the primary way the federal government determines the success and progress of the 21st CCLC program based on the statutory requirements. The data collection is necessary to allow ED to collect information from states that are now directly administering the program and from the grantees to which the states have awarded the grants. This electronic collection request represents a 88% reduction from the previous collection and provides a more accurate representation of performance against the GPRA measure.

**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.**

None of these special circumstances are applicable.

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.**

A 60 and 30 day Federal Register notice was published allowing for public comment. There were two public comments received during the 60-day comment period:

Responses to 60-day public comments:

ED-2018-ICCD-0047-0006 – GPRA comments letter Afterschool Alliance June 2018:

The 21st CCLC program office acknowledges the Afterschool Alliance’s comments and we agree that gathering data is critical to the work of afterschool programs for understanding of the impact made to individuals, programs, states, and the program as a whole.

The 21st CCLC program office will take your comments under advisement concerning our office revisiting the Government Performance and Results Act (GPRA) standards for the purpose of aligning the performance measures with the authorized objectives for the program as stated in the Every Student Succeeds Act (ESSA).

ED-2018-ICCD-0047-0007 – GPRA21CCLC ACT Now:

The 21st CCLC program office acknowledges the ACT Now Coalition of Illinois’ comments and we agree that gathering data is critical to the work of afterschool programs for gaining an understanding of the impact the program has on individuals, programs, states, and the program as a whole.

The 21st CCLC program office will take your comments under advisement concerning the need for the program office to revisit the Government Performance and Results Act (GPRA) standards for the purpose of aligning the performance measures with the authorized objectives for the program as stated in the Every Student Succeeds Act (ESSA).

The Department of Education facilitates several channels of consultation with stakeholders and authorized system users on the availability of data, frequency of collection, the clarity of instruction and recordkeeping, disclosure, and reporting format (other than that which is required by Congress). The Department hosts regular listening sessions and technical working group meetings each year to consult with stakeholders. In addition, the Department sponsors a help desk where authorized users can submit questions and suggestions for reduced burden and improved efficiency.

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

There are no payments or gifts provided to respondents.

**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 ICRAS' Part 2 IC form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided. 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). 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.**

System users are not provided any assurance of confidentiality because confidentiality is not authorized in the applicable statutes, regulations, or agency policy. 21APR does not collect information that is covered under the Privacy Act of 1975. The data collected consists solely of quantitative data regarding center performance and voluntary qualitative information relating to performance reporting.

No PII is collected in this system.

**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 questions of a sensitive nature are asked in this system.

**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 Question 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.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form. (The table should at minimum include Respondent types, Number of Respondents 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 Question 14.**

Sub-grantees are required to submit Annual Performance Report information in a Web-based format. The average respondent burden for the Annual Performance Report is estimated to be 30 hours per sub-grantee, including 24 hours preparing the data and 6 hours entering the data. The preparation of data entails readying it for entry into 21APR; 21APR does not collect any data that are not already being collected by 21st CCLC programming for their own evaluation purposes. 21APR entry includes reading instructions; making appropriate calculations; completing the profile for new grantees; ensuring unduplicated counts of participants; answering all questions fully; and completing and submitting the online forms. The estimate also includes completing the Teacher Reported information, since it



is an optional part of the Annual Performance Report and is not a separate form. We estimate that sub-grantee staff will earn, on average, \$20 per hour. The total burden is estimated as follows:

2637<sup>3</sup> sub-grantees x 30 hours per sub-grantee = 79,110 hours per year x 1 year  
Total Sub-grantee Hours for 2017 = 79,110 hours x \$20 per hour  
Total Sub-grantee Cost for 2017 = \$1,582,200

This estimate can vary depending on the amount of information states require of their sub-grantees. Each state has discretion to require all of the achievement-level data, but for purposes of this request, we are only requiring one element in the achievement data capture list to be reported.

In some states, SEA Users (state support staff) collect sub-grantee grantee data to enter the annual reporting data directly into 21APR. These tasks are expected to take an average of six hours. SEA Users are expected to aggregate center data and make necessary calculations. We estimate that SEA Users will earn, on average, \$25 per hour. Using these estimates, the total burden is estimated as follows:

139 SEA Users x 6 hours per SEA Users = 834 hours per year x 1 year  
Total SEA Users Hours for 2017 = 834 hours x \$25 per hour  
Total SEA Users for 2017 = \$20,850

Each SEA Super User will also be required to supply limited information about their state programs, including output collection type. The majority of their use of the system is reviewing and certifying the data. .

Based on input from a representative group, the SEA Super Users have requested the ability to review and monitor the submissions made by their states' grantees prior to final certification to ED. We estimate that it will take eight hours to review the information submitted by their sub-grantees and certify the data for their state. We estimate that SEA Super Users will earn, on average, \$35 per hour. Using these estimates, the total burden is estimated as follows:

54 SEA Staff x 8 hours per SEA = 432 hours per year x 1 year  
Total SEA Staff Hours for 2017 = 432 hours x \$35 per hour  
Total SEA Staff Cost for 2017 = \$15,120

The current number of grantees in each state is variable based on many factors. However, the above estimates can be averaged across all states to provide the total burden per state, per year as follows:

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<sup>3</sup> The number of active 21APR subgrantee users as of November 2, 2017.

Total Sub-grantee Hours for 2017 = 79,110 hours  
Total SEA User Hours for 2017 = 834 hours  
Total SEA Super User Hours for 2017 = 432 hours  
Total Hours for 2017 = 80,376 hours / 54 states  
**Total Hours per State for 2017 = 1,488**

Total Sub-grantee Cost for 2017 = \$1,582,200  
Total SEA User Cost for 2017 = \$20,850

Total SEA Super User Cost for 2017 = \$15,120

Total Cost for 2017 = \$1,618,170/ 54 states

**Total Cost per State for 2017 = \$29,966.11**

**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 Questions 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 Question 12.**

**Total Annualized Capital/Startup Cost:**

**Total Annual Costs (O&M):**

**Total Annualized Costs Requested:**

There are no capital or O&M/purchase costs outside of customary and usual business or private practices.

- 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 Questions 12, 13, and 14 in a single table.**

Collection	Annual Responses	Hours of work per year (52 weeks/year; 40 hours/week)	Total Hours
21 <sup>st</sup> CCLC Annual Performance Report review and publish	54	20 hours/year	1,080

The annualized cost for the Federal Government is estimated to be \$54,000 (1,080 hours multiplied by an average wage of \$50 per hour). There is a wide range of hourly salaries associated with ED personnel, making this estimation approximate.

- 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 a reinstatement with change of a previously approved collection; although this is a reinstatement with change, there is a decrease of -945 annual burden hours from the previous collection. However, the program change of 1,488 annual hours is due to the

reinstatement. The US Department of Education authorized the development of a new data collection system, designed specifically to reduce the burden of entry for users and increase validity of the overall data. This revised collection streamlines previously approved questions. This collection request represents an 88% reduction from the previous collection and provides a more accurate representation of performance against the GPRA measure. Furthermore, this extension estimates averaged cost burden per state instead of states and separately their sub-grantees.

**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.**

Data for an annual period are collected beginning in the spring of the following year. (For example, collection of data from the performance period 2015-2016 (Summer 2015, Fall 2015, and Spring 2016) began in March 2017.) Data are entered during a window of time for each term (Summer, Fall, and Spring). Data are certified by State agencies by December. The data are then exported and analyzed.

The Department of Education then prepares an annual program performance report to be submitted to Congress. Once finalized, the report is published on the Department of Education's website.

**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.**

Approval to not display the expiration date for OMB approval is not sought.

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

There are no exceptions to the certification statement.