

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

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 collection of this information is part of the government-wide effort to improve the performance and accountability of all federal programs, under the Government Performance and Results Act (GPRA) passed in 1993, the Uniform Guidance, and EDGAR. Under GPRA, a process for using performance indicators to set program performance goals and to measure and report program results was established. To implement GPRA, ED developed GPRA measures at every program level to quantify and report program progress required by the Elementary and Secondary Education Act of 1965, as amended. Under the Uniform Guidance and EDGAR, recipients of federal awards are required to submit performance and financial expenditure information. The GPRA program level measures and budget information for the Magnet Schools Assistance Program (MSAP) are reported in the Annual Performance Report (APR). The APR is required under 2 CFR 200.328 and 34 CFR 75.118 and 75.590. The annual report provides data on the status of the funded project that corresponds to the scope and objectives established in the approved application and any amendments. To ensure that accurate and reliable data are reported to Congress on program implementation and performance outcomes, the MSAP APR collects the raw data from grantees in a consistent format to calculate these data in the aggregate.

- 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.**

Data collection activities are designed to yield quantitative raw data that represents grantees program implementation, performance outcomes, and budget information. This section details the data collection activities requiring clearance by the Office of Management and Budget. The information collected will be used to calculate MSAP's performance for its GPRA measures, understand the performance of the cohort as a whole against the scope and objectives established in the approved applications and any amendments, gather budget information and put the findings/outcomes into context. Exhibit 1 details the data collection instrument's mode of administration, content, needed completion time, and estimated timeline for administration.

Exhibit 1. Data Collection Instruments

| Instrument/ Respondent group | N | Mode of administration | Content | Time | Timeline |
|--|------------------------|---|------------------------------------|-------------------------------|---------------------------------|
| MSAP Data Tables and Budget Form/MSAP grantee school | 162 MSAP schools | Data uploaded in MAPS system with APR | MSAP Data and Budget Figures | 30 minutes per MSAP school | September through October |

- 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.**

Currently, grantees submit their APRs using MAPS. The Data Tables have been updated and streamlined to reflect the evolution of the MSAP GPRA measures from past cohorts, and several sections have been added to help the program office and the field better understand the performance of the cohort as a whole against the scope and objectives established in the approved applications and any amendments. The simultaneous submission of this information using a format and mode familiar to the grantees standardizes collection and reduces the burden faced by grantees.

- 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 APR data collected through the MSAP Data Tables and Budget Form are not currently available or collected via the current OMB approved generic annual performance reporting forms and ED524. Therefore, the data collected via the MSAP Data Tables and Budget Form will not cause a duplication of efforts.

- 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.**

The program 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.**

Grantees must submit the APR (EDGAR § 75.253). Without the data collection, ED could not report accurate and reliable GPRA data to Congress, hold grantees accountable, or approve continuation funding. The APR provides data on the status of the funded project that corresponds to the GPRA measures and commitments established in the approved application and any approved amendments.

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 tht it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.**

There are no circumstances that require this information collection to be conducted in a manner inconsistent with any of the conditions outlined under A.7 of the special instructions for the justification.

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.

Prior to implementing the first iteration of the MSAP Data Tables and Budget Form, OII held two feedback webinar discussions with less than nine grantees and consultants that allowed them to provide input on the forms. Based on the given feedback, adjustments were made to the forms to make them more user-friendly; these form adjustments did/do not change the amount of time to complete the forms. The Department has published a 60-and 30-day Federal Register Notice with no public comments received during the 60-day comment period.

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

No payments or gifts to respondents were made and none are planned or contemplated.

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

There are no assurances of confidentiality.

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.

The data collection includes no questions of a sensitive nature.

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.**

The MSAP Data Tables and Budget Form data collection will occur annually; the responding grantee's estimated annual hour burden will remain 30 minutes per MSAP school. The total estimated annual hour burden will vary per grant project because the number of schools in each MSAP project varies. The 2016 MSAP grant cohort has 38 schools, and the 2017 MSAP cohort has 124 schools, ranging from 1 to 7 magnet schools per project. Exhibit 2 shows the estimated annual/total respondent burden for this data collection as 81 hours.

Exhibit 2. Respondent Hour Burden Estimate

| Data Collection Activity | Hour Burden per Respondent (in hours) | Total Expected Number of Respondents | Total Hour Burden (in hours) |
|----------------------------------|---------------------------------------|--------------------------------------|------------------------------|
| MSAP Data Tables and Budget Form | 0.50 | 162 | 81 hours |

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 : _____
 Total Annual Costs (O&M) : _____
 Total Annualized Costs Requested : _____

There are no costs that meet the criteria for inclusion under this item.

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.

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|---|--------------------|
| Updating MSAP Data Tables and Budget clearance package (10 hrs x \$50/hr) | = \$ 500 |
| Staff time for review (2 staff x 90 hours/staff x \$50/hr) | = \$ 9,000 |
| Cost of consultant/contractor to collect and analyze data | = \$ <u>50,000</u> |
| Estimated total cost to the Federal government | = \$ 59,500 |

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

The Department now seeks to revise the MSAP Data Tables and Budget Form and submits this revision package for public comment. OII extended the current data collection as a separate action; this permitted us to use it for the performance reports that are due in October 2018. This clearance package is separate from that effort. Concurrently seeking clearance for this revision effort provided us with the time that we needed to build/revise the electronic system that will gather the information. The revised MSAP Data Tables and Budget Form will be used for the performance reports that are due in May 2019.

The revised MSAP Data Tables and Budget Form include the following major revisions: (1) a major streamlining of the existing student enrollment data collection tables; and (2) the addition of the student recruitment/selection, evidence of promise, science achievement, course enrollment, and community partnerships sections. The streamlining of the student enrollment data collection tables will save grantees time as they will be asked to input less information for each school. The addition of the enumerated sections will provide OII with the information that it needs to track core elements of the program (e.g., evidence of promise is now required under ESEA, as amended). The Department anticipates this will have no net effect on the total amount of time each grantee devotes to 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. 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.

There are no plans for publication of the information.

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.

There are no plans to not display the expiration date of the OMB approval of the data collection.

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 to the certification statement.