

**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.**

This is a request to extend approval of an information collection request that solicits applications from eligible entities for Performance Partnership Pilots for Disconnected Youth (P3).

P3 was first authorized by Congress in FY 2014 by the Consolidated Appropriations Act, 2014 (2014 Act), and the authority has been included by Congress in appropriations acts each year since FY 2014, including, most recently, the Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Acts, 2019 (Public Law 115-245). The P3 authority enables pilot sites to blend Federal funds and obtain waivers of program requirements, including statutory, regulatory, and administrative requirements that are barriers to achieving improved outcomes for youth-serving programs included in the authority.

For FY 2018, the P3 authority extends to discretionary programs “targeted on disconnected youth, or designed to prevent youth from disconnecting from school or work, that provide education, training, employment, and other related social services” that are administered by the U.S. Department of Education (ED), the Departments of Labor (DOL), Health and Human Services (HHS), Housing and Urban Development (HUD), and Justice (DOJ); the Corporation for National and Community Service (CNCS); and the Institute of Museum and Library Services (IMLS). For FY 2019, as of this date, authority has been enacted for ED, DOL, HHS, CNCS, and IMLS programs; legislation to extend the authority to applicable DOJ and HUD programs was pending.

**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 will be used in several ways. First, it will be used by peer reviewers and ED to assess the extent to which an applicant meets the priorities, requirements, and selection criteria of the P3 competition. ED will generate a rank-order list of applications based on the average scores awarded by peer reviewers. The information provided in the top-ranked applications will then be assessed by the applicable agencies to determine whether the waivers sought by these applicants may be granted. Once the entities with which agreements will be established are identified, the information will be used to inform the development of these performance agreements. In addition, the agencies will use the information obtained through this collection to prepare

summaries of the projects that will be carried out for dissemination to members of Congress and the general public. Finally, the agencies will use this information to monitor the progress of each entity awarded P3 authority.

**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.**

Applicants will be required to submit their applications electronically.

**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.**

This is a unique information collection request. It does not duplicate any other collection.

**5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.**

Small entities that may apply for the P3 authority include local governments from rural areas and small towns and Indian tribes. The efforts to reduce burden described in response to the Question 8 benefit 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 agencies would be unable to implement the P3 authority if this collection is not carried out.

**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.**

None of the special circumstances listed above apply. This collection is consistent with 5 CFR 1320.5(d)(2).

- 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.**

A 60 day notice was published in the Federal Register on November 21, 2018 (83 FR 58765). No substantive 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.**

Respondents will not be provided any payments or gifts for data collection.

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

The Department is not requesting any confidential information, so no assurances of confidentiality are necessary.

**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.**

There are 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 16 of IC Data Part 1.**

- **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.**

We anticipate that 25 entities will submit applications for P3 authority for each of the next three fiscal years and that preparing these applications will take each applicant, on average, 80 hours at a cost of \$59.23, the mean hourly compensation cost for State and local government workers who were in management, professional, and related occupations in June 2018. We thus estimate that the total number of hours for all respondents to prepare applications to be 2,000 hours and the total annual cost of doing so to be \$118,460. Over the course of the next three years, the estimated burden is 6,000 hours and the estimated cost is \$355,380.

**Applicant Burden Estimates**

<b>Year</b>	<b>Number of</b>	<b>Hours/</b>	<b>Hours</b>	<b>Cost/</b>	<b>Cost</b>
-------------	------------------	---------------	--------------	--------------	-------------

	<b>Applicants</b>	<b>Activity</b>		<b>Hour</b>	
2018	25	80	2,000	\$59.23	\$118,460
2019	25	80	2,000	\$59.23	\$118,460
2020	25	80	2,000	\$59.23	\$118,460
<b>TOTAL</b>	<b>75</b>	<b>240</b>	<b>6,000</b>		<b>\$355,380</b>

**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 start-up costs for this collection.

**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 Federal costs will involve providing technical assistance to prospective applicants, screening the applications, carrying out the peer review of applications, assessing the merits of the waivers sought by the top-ranked applicants, and negotiating performance agreements.

The Department estimates that conducting these activities will require the following for each of the two years that competitions will be carried out:

- Grade 13: 400 hours at \$52.66/hour = \$21,064
- Grade 15: 400 hours at \$73.20/hour= \$29,280

ANNUAL TOTAL= \$50,344

The total cost to the Government over the course of three years is thus anticipated to be \$151,032.

**15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.**

There is a reduction in total burden hours a result of a reduction in the agency estimate of the number of respondents. Based on the Department's experience administering this authority, an estimate of 25 respondents annually is more likely than the earlier estimate of 55 respondents annually. In the previous three competitions (FYs 2015, 2016, and 2017), the numbers of respondents were 45, 14, and 20, respectively. Moreover, the previous three competitions awarded grant funds, as well as flexibility, a practice that we do not expect will continue in future competitions. We expect a reduction in the number of applicants as a result.

The annual cost burden has increased because the cost burden was erroneously identified as zero when this collection was approved.

**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 Department may publish on its website the applications of the entities with which performance agreements are established.

**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 expiration date will be displayed on the form.

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

There are no exceptions to the certification statement identified in the “Certification for Paperwork Reduction Act Submissions” Form.