

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.**

Information in the NPD grantee performance report is being collected in compliance with section 3131(c)(1)(C) of the *Elementary and Secondary Education Act of 1965 as amended by the Every Student Succeeds Act*, and in accordance with the *Government Performance Results Act (GPRA) of 1993*, Section 4 (1115), and the Education Department General Administrative Regulations (EDGAR), 34 CFR 75.253. EDGAR states that recipients of multi-year discretionary grants must submit an APR demonstrating that substantial progress has been made towards meeting the approved objectives of the project. In addition, discretionary grantees are required to report on their progress toward meeting the performance measures established for the U.S. Department of Education (ED) grant program. The Department is requesting an extension for this collection. No changes are requested and it is not involved in rulemaking.

- 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.**

Grantees are required to report targets and their progress toward meeting the objectives and goals established for each ED grant program. The purpose of this data collection serves two purposes; the data are necessary to assess the performance of the NPD program on measures and also, budget information and data on project-specific performance measures are collected from NPD grantees for project monitoring and for the purpose of determining continuation funding. NPD grantees submit these data annually to the Office of English Language Acquisition.

The program office staff will aggregate and report the actual data to ED's Budget Service. This information supports ED's budget request for programs, ensures program implementation is focused on results, aids the Department in planning technical assistance activities, and ensures that performance is measured by outcomes achieved. The aggregated actual performance data will also be included in ED's annual Program Performance Report.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or**

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

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 annual GPRA data and information is collected electronically via the G5 system.

- 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.**

There is no duplication of reporting. The information described in item 2, is not collected or reported elsewhere.

- 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 involve small businesses, small organizations, 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.**

OELA collects the information in accordance with the Government Performance Results Act. Failure to collect the information would prohibit our ability to determine program outcomes/results and substantial progress for continuation funding.

- 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.**

There are no special circumstances that would require the collection to be conducted in a manner inconsistent with OMB guidelines or 5 CFR 1320.5.

- 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.

OELA plans to publish a 30 and 60 day notice out for public comment and will respond to public questions in a timely manner.

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

Payments and/or gifts are not provided to grantees in support of the data collection.

- 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 assurances of confidentiality are provided to grantees and PII is not collected.

- 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.**

Questions of a sensitive nature are not included in the data collection.

- 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**

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)

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 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.**

The National Professional Development program has averaged 138 grantees. Based on grantee input and estimates by Department staff we estimate that it takes 50 hours to complete the annual performance report for the NPD program. By calculating 138 grantees x 50 hours = 6,900 total annual burden hours to complete the annual performance report.

The project staff that are responsible for completing, reviewing, and submitting the annual performance report are estimated to earn an hourly rate roughly equivalent to a GS-12. 50 hours x \$41.66 = \$2,083.33 x 138 responses = \$287,500 for the annualized costs to grantees.

Burden hours should not vary widely because the scope of the annual performance report is the same for each respondent. The performance report is a single form.

Estimated hours and costs are provided in the Exhibits 1 and 2 below.

Exhibit 1. Estimated burden hours

Program Year	Number of Responses	Type of Staff	Average Burden Hours per Response	Total Burden Hours
2020	138	Project Director	50 hrs	6,900 hrs
2021	138	Project Director	50 hrs	6,900 hrs
2022	138	Project Director	50 hrs	6,900 hrs

Exhibit 2. Estimated costs

Year	Respondent	Average Burden Hours per Response	Hourly Rate	Average Total Cost Per Response	# of Responses	Total Annual Costs
2020	Project Director	50 hrs	\$41.66	\$2,083.33	138	\$287,500
2021	Project Director	50 hrs	\$41.66	\$2,083.33	138	\$287,500
2022	Project Director	50 hrs	\$41.66	\$2,083.33	138	\$287,500
	Average	50 hrs	\$41.66	\$2,083.33	138	\$287,500

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

There are no additional costs to respondents or record-keepers resulting from each collection other than that already reported in A12 and A14, including capital or start-up costs, or operation, maintenance, or purchase of services.

- 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 NPD program office staff will conduct the data collections for the grantee annual performance report. These estimates are based on 138 grantees. It should take approximately three hours to assess the completeness and quality of each grantee's annual performance report. Program officers reviewing the annual performance report range from GS11 - 14. Using the hourly rate from GSA salary table for the Washington DC metro area, the total annualized federal cost for both data collections will be approximately \$18,773.34.

- 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).**

There is no request for change or adjustment to collection process.

- 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 is a plan to publish an aggregated summary report of the overall program. No specific grant(s) will be identified in this summary report. The program office will follow OMB recommended steps to ensure information quality. Following this, the program office will engage in peer review by Education Department colleagues as well as experts in the field for any publication of analyses resulting from APRs. Beyond that publication, GPRA reporting results are sent to ED's Budget Service for compliance with GPRA and publication in ED's Annual Program Performance Report.

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.

We are not seeking approval to withhold the date. The OMB number and expiration date will be displayed on the data collection 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.