

**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 for a new information collection in order to collect the Annual Performance Report (APR) for the Statewide Family Engagement Centers (SFEC) program. 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 the Education Department General Administrative Regulations (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, the U.S. Department of Education (ED) developed GPRA measures at every program level to quantify and report program progress required by the Elementary and Secondary Education Act of 1965 (ESEA), 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 SFEC program are reported in the APR. The APR is required under 2 CFR 200.328 and 34 CFR 75.118 and 75.590. It provides data on the status of funded projects that correspond to the scope and objectives established in the approved applications and any amendments. To ensure that accurate and reliable data are reported to Congress on program implementation and performance outcomes, the SFEC APR collects 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.**

Grantees will complete a reporting form annually. The grantees are statewide organizations, such as SEAs, and statewide consortia of organizations, such as LEAs. The reporting form they complete will document their progress in achieving the goals set out in their applications for funding. The APR will also allow ED to identify trends, common strengths, challenges, best practices, and other key findings that will allow ED to refine the project in the future while simultaneously mitigating risk and ensuring program integrity. The APR pays special attention to recording grantee performance on four GPRA measures, as outlined below. Distributing the APR to all SFEC grantees will enable the collection of responses and data concerning these four measures.

GPRA Measure I: The number of parents who are participating in SFEC activities designed to provide them with the information necessary to understand their annual school report cards and other opportunities for engagement under section 1116 and other related ESEA provisions.

GPRA Measure II: The number of high-impact activities or services provided to build a statewide infrastructure for systemic family engagement that includes support for SEA (State

Education Agencies)- and LEA (Local Education Agencies)-level leadership and capacity-building.

GPRa Measure III: The number of high-impact activities or services implemented to ensure that parents are trained and can effectively engage in activities that will improve student academic achievement, to include an understanding of how they can support learning in the classroom with activities at home or outside the school generally, as well as how they can participate in State and local decision-making processes.

GPRa Measure IV: The percentage of parents and families receiving SFEC services who report having enhanced capacity to work with schools and service providers effectively in meeting the academic and developmental needs of their children.

- 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.**

The APR will be web-based and available online. Web-based administration of the APR reduces the cost of collecting, managing, and analyzing grantee data. The form will allow users to save their work and return to complete it later. It will also incorporate skip patterns and pre-populated fields to keep response burden to a minimum. Grantees can be provided with a unique link and password so that only grantee-authorized personnel will be able to respond on behalf of each grantee. Project staff will also be available by phone and email to assist grantees in completing the form.

- 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 this collection are not currently available or collected via the current OMB approved generic APR reporting forms and ED524. Therefore, the data collected via this collection will not cause duplication of effort.

- 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.**

There is no impact on 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 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 that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances for the data collection.

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.**

ED is publishing the applicable 60-day Federal Register notice requesting public comment and will subsequently publish the required 30-day Federal Register notice.

The Office of Elementary and Secondary Education (OESE) also held a feedback webinar discussion with less than nine grantees 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 not change the amount of time to complete the forms.

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

Reporting respondents will not receive any payments, awards, or gifts.

**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 reporting form questions do not request sensitive information. Respondents are asked to report on project objectives; identify participating school districts and schools; identify project partners; describe plans for evaluating the effectiveness of their project; report on project activities and progress during the reporting period; and provide their budget.

**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 be included in Item 13.**

Our time estimates for the completion of the project's reporting form are shown in Exhibit 1 below. The estimates are based on similar grantee reporting forms developed for other grantee project directors, evaluators, and staff.

We estimate that there will be twelve grantees required to report annually.

We estimate that it will take a SFEC grantee project director a total of 30 hours to complete the form. This estimate includes 6 hours to complete the online reporting form, based on our internal pilot testing of the form. We also include time needed to review the *APR Guide*, estimated at 4 hours. We expect the remaining 20 hours of project directors' time to consist of the following: (1) organizing information about project progress and expenditures, estimated at 4 hours; (2) preparing a description of the project; (3) providing contact information about the project; and (4) corresponding with partner staff to obtain information, collectively estimated at 16 hours.

Assuming an hourly rate of \$43.06<sup>1</sup>, the estimated annual cost per respondent to complete the online reporting form is \$1,291.80. The cost estimates are shown in detail in Exhibit 2.

**Exhibit 1. Estimated burden hours**

<b>Data Collection Activity</b>	<b>No. of Respondents</b>	<b>Time Per Response (Hours)</b>	<b>Total Burden (Hours)</b>
Complete Online APR Reporting Form	12	6 hours	72
Review <i>APR Guide</i>	12	4 hours	48
Organize internal project information on progress and expenditures	12	4 hours	48
Prepare project description, provide project contact information, and correspond with partner staff	12	16 hours	192
<b>Totals</b>	<b>12</b>	<b>30 hours</b>	<b>360 hours</b>

**Exhibit 2. Estimated cost to respondents**

<b>Data Collection Activity</b>	<b>Total Burden (Hours)</b>	<b>Hourly Wage Rate</b>	<b>Cost / Response</b>	<b>Total Costs Across Respondents</b>
Complete Online APR Reporting Form	72 hours	\$43.06	\$258.36	\$3,100.32
Review <i>APR Guide</i>	48 hours	\$43.06	\$172.24	\$2,066.88
Organize internal project information on progress and expenditures	48 hours	\$43.06	\$172.24	\$2,066.88

<sup>1</sup> The mean hourly wage for Education Administrators, All Others was \$43.06 as reported in May 2018 by the U.S. Department of Labor, Bureau of Labor and Statistics: <https://www.bls.gov/oes/current/oes119039.htm>. This is the most appropriate labor category for project directors.

<b>Data Collection Activity</b>	<b>Total Burden (Hours)</b>	<b>Hourly Wage Rate</b>	<b>Cost / Response</b>	<b>Total Costs Across Respondents</b>
Prepare project description, provide project contact information, and correspond with partner staff	192 hours	\$43.06	\$688.96	\$8,267.52
<b>Totals</b>	<b>360 hours</b>	<b>\$43.06</b>	<b>\$1,291.80</b>	<b>\$15,501.60</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 purchasing or 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.**

There are no direct costs to respondents beyond their time to complete the reporting form as documented in the response to question 12 above.

**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.**

Updating SFEC APR 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	= \$ 50,000
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.**

This is a new collection of information that will result in a total of 360 annual burden hours and a cost of \$15,501.60 annually for the public.

**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.**

The OMB expiration date will be displayed on all data collection instruments.

**18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.**

There are no exceptions to the certification.