SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
U.S. Department of Education Supplemental Information for the SF-424

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 U.S. Department of Education Supplemental Information form for the SF-424 is used together with the SF-424, Application for Federal Assistance. Several years ago ED made a decision to switch from the Application for Federal Education Assistance or ED 424 (1890-0017) collection (now 1894-0007) to the SF-424, in order to adhere with Federal-wide forms standardization and streamlining efforts, especially with widespread agency use of Grants.gov.

There were several data elements/questions on the ED 424 that were required for applicants and were not included on the SF-424. Therefore, ED put these questions that were already cleared as part of the 1894-0007 collection on a form entitled the, U.S. Department of Education Supplemental Information for the SF-424.

The questions on this form deal with the following areas: Project Director identifying and contact information; New Potential Grantee or Novice Applicants; Opportunity Zones and Human Subjects Research. The ED supplemental information form can be used with any of the SF-424 forms in the SF-424 forms family, as applicable.

The following statements describe the necessity of each of the question areas on the ED Supplemental Information form:

- Project Director: It is extremely helpful to Department staff, both in the pre-award and post-award phase, to know the name and contact for the proposed Project Director for a grant. Often, the person listed as the contact for matters involving the application on the SF-424 has not been directly involved in the preparation of the programmatic portion of the application. Having proposed Project Director information assists us in coordinating pre-award contacts if necessary (note that ED has established policy regarding what types of pre-award contacts with an applicant are appropriate.) Further, having proposed Project Director information available in the application on the supplemental information form allows ED to quickly establish contact with the proposed Project Director after the grant has been awarded.

- New Potential Grantee or Novice Applicant: The new potential grantee or novice applicant question is used by ED program offices to identify which applicants qualify as new potential grantee or novice applicants in competitions that give special consideration to new potential grantees or novices. By asking this question of all applicants, ED will be better able to plan for the amount and type of technical assistance a novice applicant might need if funded. Further, the regulations in 34 CFR 75.225 (d) state that before making a grant to a novice applicant, the Secretary imposes special conditions, if necessary, to ensure the grant is managed effectively and project objectives are achieved. It is therefore important for ED to know whether an applicant is a novice in order to determine whether special conditions might be necessary.

- <u>Opportunity Zones</u>: The opportunity zone question is used by ED program offices to identify applicants who do their work in an Opportunity Zone, applicants that are located in an Opportunity Zone, and applicants that will increase the impact of each federal dollar by partnering with a Qualified Opportunity Fund. The Secretary of Education has prioritized funding for grant applications that support students, teachers and parents in economically distressed communities, known as Opportunity Zones.

- <u>Human Subjects Research</u>: In order to comply with 34 CFR Part 97, ED must collect information on which applications are planning to conduct human subjects research; which applications are planning on conducting exempt research (and which exemption applies); and lastly which applications are planning on conducting non-exempt research, which will eventually need to provide a certification of Institutional Review Board approval, if funded. One of the Human Subjects questions also asks whether the applicant has a Federal Wide Assurance (FWA) on file with the Office of Human Research Protections (OHRP). No ED-funded covered research can be cleared for initiation until the grantee has an Assurance in place and the study has IRB approval. Nearly all Assurances in ED-funded research are Federal Wide Assurances (FWAs), which are issued by OHRP for all 16 Common Rule departments and agencies. Inclusion of this information speeds agency review and clearance of funded research.

Note that the SF 424:" RESEARCH & RELATED Other Project Information" also asks for information on exemptions, IRB review and Assurances. (E.g.:
http://apply07.grants.gov/apply/forms/sample/RR_OtherProjectInfo_1_3-V1.3.pdf

That form includes:

* 1. * Are Human Subjects Involved?

If YES to Human Subjects Yes No

If yes, check appropriate exemption number.

Human Subject Assurance Number:

Numerous ED grant programs that include covered research fund a variety of activities (e.g. staff development, ...) and do not use the SF 424 R&R application form. The ED supplemental form is simply providing information parallel to that in the R&R form for those grant programs that do not use the R&R form.

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.

As indicated in the response to Question #1 of this Supporting Statement, ED program offices use the Project Director contact information to assist with any pre-award contact with the applicant, if necessary, and to facilitate expeditious contact with the Project Director after the grant has been awarded. This helps to establish a partnership relationship between ED and the grantee. The new potential grantee or novice applicant question is used by ED program offices to identify which applicants qualify as novice applicants in competitions that give special consideration to novices. Further, in the future this question will be asked of all applicants, not just those applying to programs giving special consideration to novices, in order to help ED plan for the amount and type of technical assistance that might be needed for novice grantees. The Opportunity Zone question is used by ED program offices to identify applicants who do their work in an Opportunity Zone, applicants that are located in an Opportunity Zone, and applicants that will increase the impact of each federal dollar by partnering with a Qualified Opportunity Fund. Lastly, the Human Subjects Research questions are used by ED to determine which applicants are subject to the Protection of Human Subjects regulations in 34 CFR Part 97 and which will need to obtain certification of IRB approval and a Federal Wide Assurance.

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.

In FY 2020, 100% of ED's discretionary grant competitions were available either through Grants.gov or G5, the Department of Education's Grants Management system. The SF-424 and the ED Supplemental Form (being cleared in this collection) are available in the Grants.gov APPLY module.

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.

ED has already eliminated duplication by discontinuing use of the agency-specific ED 424 that had many of the same data elements as the SF-424. The three question areas on the ED Supplemental Form are unique data elements that are not contained on the SF-424.

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.

Under EDGAR regulations, all requirements for small entities are minimized.

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 administration, determination and distribution of program funds could not be accomplished if the information was collected less frequently. The frequency of the application is mandated by the respective legislation and program regulations (Annual appropriations legislation provides enough funding for one competition for the Department's grant programs in each FY. Likewise, each program office which consists of 6 grant making offices within the Department, have their own statues and regulations that mandate the frequency of applications.), as well as by the availability of ED funding for new grant competitions.

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.

This information will be collected in a manner consistent with the general information collection guidelines in 5 CFR 1320.5.

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.

The 60-day notice was published on June 19, 2020 (85 FR 37079). Three public comments were received that were nonsubstantive. A 30-day notice will be published. Opportunity for comment was given through the publication of a 60-and 30-day Federal Register Notice. The Department did not receive any comments.

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

No payments or gifts are provided to respondents.

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

ED is not requesting any confidential information in this collection; therefore no assurances of confidentiality are required.

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.

This information collection does not include information 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.

Table 1
Respondent's Hour Burden

	Number of Respondents	**Frequency of Responses**	**Hours per Response**	**Annual Burden**
Discretionary (includes Fellowships)	**5976**	**1**	**.33**	**1972**
Totals	**5976**			**1972**

The time required to complete this information collection is estimated to average between 15 and 45 minutes per response. This includes time to review instructions, search existing data resources, gather the data needed and complete and review the information collection. An average of 20 minutes or 1/3 of an hour (.33) is used to calculate burden hours for discretionary grant applicants in this collection. The hours per response in this collection for discretionary grant applicants is 20 minutes per response, which accounts for several different factors. For example, it takes into account both the fact that all discretionary grant applicants must answer whether or not they meet ED's definition of a novice applicant and that some applicants may need to research their Federal funding history before responding to this question. It also notes that the majority of ED grant applications will not be conducting Human Subjects Research.

- 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.

Table 2
Respondent's annualized Cost

Respondent's Hourly Wage	Hours per Response	Cost to Respondent per Response
$41.37[1]	**.33 (discretionary grant applicants)**	**$14.00 (discretionary grant applicants)**

1972 discretionary grant applicants X $14.00 = $27,608.00

Respondent's total annualized cost: $27,608.00

[1] The hourly rate of $41.37 is based on the current GS-12 step 1 salary for the Locality Pay Area of Washington-Baltimore, DC-MD-VA-WV (Including St. Mary's County, MD) Effective January 2020.

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

No start-up maintenance and purchase of services costs will be incurred by the respondents.

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 salary of a GS-12, Step 1, hourly rate of $41.37 multiplied by 0.17, equates to 10 minutes multiplied by the number of respondents (5976) for a total annualized cost to the Federal Government of $42,029.

Staff Review Costs

$41.37 (GS-12 salary) X .17 of an hour (10 minutes) X 5976 = $42,029

Total Annualized Cost to the Federal Government:

$42,029

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

There is an adjustment decrease in both the number of respondents and the number of burden hours estimated in this collection. The number of respondents for this collection is 8,078 compared to the current inventory for this collection of 5,976. The burden hours for this collection total 2666 compared to the current inventory of 1972 burden hours. Due to a decrease in funding to the Department's discretionary grant programs there was a decrease in the number of discretionary grant applications received and an adjustment to a decrease in burden hours of 694.

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.

No plans exist to publish information collected for statistical use.

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.

ED is not seeking approval to not display the expiration date for this information 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.

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.