

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. 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, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

The Elementary and Secondary Education Act of 1965 authorizes the Secretary of Education (Secretary) to establish national recognition awards to improve academic achievement and community engagement, such as the National Blue Ribbon Schools Program (NBRSP) and U.S. Department of Education Green Ribbon Schools (ED-GRS). The authorizing statute is Public Law 107-110 (January 8, 2002), section 501, Innovative Programs and Parental Choice Provisions, which created Part D—Fund for the Improvement of Education, Subpart 1, Sec. 5411(b)(5), of the Elementary and Secondary Education Act of 1965 (20 U.S.C. § 7243(b)(5)).

Begun in 2011-2012, U.S. Department of Education Green Ribbon Schools (ED-GRS) is a recognition award that honors schools, districts, and postsecondary institutions that are making great strides in three Pillars: 1) reducing environmental impact and costs, including waste, water, energy use, and transportation; 2) improving the health and wellness of students and staff, including environmental health of premises, nutrition, and fitness; and 3) providing effective sustainability education, including STEM, civic skills, and green career pathways.

The award is a tool to encourage state education agencies, stakeholders and higher education officials to consider matters of facilities, health and environment comprehensively and in coordination with state health, environment and energy counterparts. In order to be selected for federal recognition, schools, districts and postsecondary institutions must be high achieving in all three of the above “Pillars,” not just one area. Schools, districts, colleges and universities apply to their state education authorities. State authorities can submit up to six nominees to ED, documenting achievement in all three Pillars. This information is used at the Department to select the awardees.

ED collects information on nominees from state nominating authorities regarding their schools, districts, and postsecondary nominees. State agencies are provided a sample application for their use and adaptation. Most states adapt the sample to their state competition. There is no one federal application for the award, but rather various applications determined by states. They do use a required two-page Nominee Submission Form as a cover sheet, which ED provides. This very simple three-page

sample application is attached. ED has worked to encourage states to simplify their application processes, but the burden varies from state authority to authority and how they choose to approach the award.

The recognition award is part of a U.S. Department of Education (ED) effort to identify and communicate practices that result in improved student engagement, academic achievement, graduation rates, and workforce preparedness, and reinforce federal efforts to increase energy independence and economic security.

Encouraging resource efficient schools, districts, and IHEs allows administrators to dedicate more resources to instruction rather than operational costs. Healthy schools and wellness practices ensure that all students learn in an environment conducive to achieving their full potential, free of the health disparities that can aggravate achievement gaps. Sustainability education helps students engage in hands-on learning, hone critical thinking skills, learn many disciplines and develop a solid foundation in STEM subjects. It motivates postsecondary students in many disciplines, and especially those underserved in STEM subjects, to persist and graduate with sought after degrees and robust civic skills. Outdoor learning and indoor air quality are two areas that have become of even more central concern to local school administrators in the pandemic climate.

So that the Administration can receive states' nominations, ED seeks to provide the Nominee Presentation Form to states – essentially a cover sheet for states' evaluation of their nominees to ED – in three versions; one for school nominees, another for district nominees, and a third form for postsecondary nominees.

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.

ED requests information from state nominating authorities that have evaluated schools, districts, and/or postsecondary institutions according to the following categories: 1) reducing environmental impact and costs; 2) improving health and wellness; and 3) teaching effective environmental education. This information will be used at the Department to conduct final review to name the awardees annually.

A nominating authority is any one of the following:

- a Chief State School Officer (CSSO);
- the Department of Defense Education Activity (DoDEA); and
- the Bureau of Indian Education (BIE)
- State Higher Education Executive Officers

Nominating authorities submit according to the Nominee Submission Procedure, attached. They synthesize their evaluation of the nominee, convert it to a 508

compliant pdf, and submit it online to the Department by February 1st of each year. Honorees are announced each spring.

- 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. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

ED-GRS has begun receiving states' nomination packages through www.greenstrides.org. This site is maintained by ED. A password protected portion of the site, viewable only to nominating authorities, allows them to submit. Many states use online applications to select their nominees. This varies from state to state.

- 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.**

ED-GRS is the first comprehensive and coordinated federal policy in the three institutional roles of schools related to environment, health and education. The award acknowledges the work of schools in reaching high levels of achievement under three areas:

- o Reduced environmental impact and costs;
- o Improved health and wellness; and
- o Effective environmental education.

Through the award, ED encourages the critical collaborations that ensure all of our nation's schools are healthier, safer, and more sustainable. ED's complementary [Green Strides](#) initiative uses an annual report, blog, newsletter, social media and tour to facilitate the sharing of best practices and resources. In particular, the [Green Strides Webinar Series](#) and [resources](#) page help to provide all schools, districts and institutions of higher education free information on the tools that help them move toward the Pillars of the recognition award to follow the footsteps of the ED-GRS honorees. These resources pre-existed the award initiative, but are Green Strides the first time they have all been put in one place for schools to view. The award is not tied to any one program or standard, but instead encourages all schools, districts and institutions of higher education to use all of the many helpful resources available to them.

The initiative developed from an 80-entity signatory request, as well as from ED's interest in a coordinated, coherent federal policy regarding environment, health and education. It is the first of its kind.

Templates of sample applications, scoring rubrics, and press releases are provided to new states to avoid duplication of efforts on the part of Nominating Authorities, but they are adapt these or use their own language. See the attached State Administrator Toolkit.

- 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.**

To minimize burden, ED has simplified a range of requirements to be addressed in the applications from among the wide range of potential requirements and provided technical assistance to support the information collection request. These efforts include:

- ED provides a sample application for nominating authorities, should they wish to have model infrastructure on which to base their call for submissions, review and selection of nominees within their jurisdiction.
- Nominating authorities are asked to provide only documentary assessment, not on-site verification; this avoids a time-and-effort burden on states, districts, schools, and postsecondary institutions that would be associated with such on-site verification.
- ED-GRS provides technical assistance to schools, districts, and postsecondary institutions to support the dissemination of best practices and established metrics through its [Green Strides page](#).
- ED offers technical assistance calls for participating nominating authorities.
- Over the years, ED has encouraged states to simplify their application processes, recognizing that ED doesn't need reams of technical information to confirm their nominees, so long as they provide some explanation about work being done in every Pillar. In many cases, these nominees have already won private sector accolades in individual areas and can simply state what levels they have achieved in different national programs.

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.

If ED cannot collect information regarding the evaluation of schools nominated to ED, it will have no basis for recognizing U.S. Department of Education Green Ribbon Schools, District Sustainability Awardees, and Postsecondary Sustainability Awardees. Without the collection, the program is unfeasible.

In order that states may nominate candidates annually, ED must collect information annually for up to six nominees per state. This frequency cannot be reduced, although submission is totally voluntary and some states choose to submit fewer nominees. ED expects to continue to make awards annually to different schools, districts, and postsecondary institutions. ED does not permit repeat awards. Since the award is designed as a communication and outreach tool, and not a certification program, ED aims to highlight new examples of school sustainability, rather than continuing to honor the same examples year after year.

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 for this collection. Respondents submit information on a voluntary basis. Respondents are not required to retain records or submit statistical or confidential information or proprietary trade secrets.

- 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.**

Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30 day notice, indicate that a notice will be published.

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 received significant public and federal agency input on the substance of the award. It has adapted the award based on input following each of the first several years.

Over the years and especially at the inception of the award, ED has consulted with and heard from the major education associations e.g. teachers, principals, school boards; states, e.g. chief state science officers and existing state green schools programs; national NGOs e.g. US Green Building Council, Earth Day Network, National Wildlife Federation, state- and locally-based initiatives; schools and school communities e.g. private, charter, tribal; technical experts e.g. architects and designers, academics, environmental and occupational health specialists; public, e.g. parents, teachers; and other federal agencies, including the U.S. Environmental Protection Agency, Department of the Interior, National Oceanic and Atmospheric

Administration, the Department of Defense, Department of Energy, and US Department of Agriculture, among others.

ED has also conducted an annual Green Strides Tour, during which it engages with many past honorees, future applicants, and state and local stakeholders. ED continues to receive high interest from the public that this recognition award continue.

A 60 day notice was published in the Federal Register on August 13, 2020 (85 FR 49361). Three public comments were received but were not substantive enough to require changes. A 30 day comment period notice will be published.

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

This information collection does not involve payment or gifts of any kind.

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.¹ 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. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.

Confidential information 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.

¹ 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)

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Annualized Totals			90	1		22 hours		\$660

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

The burden is on two sectors: 1) the Nominating Authorities and 2) the applicants (schools, districts, and postsecondary institutions). The activities they conduct are described below, the estimated burdens for each provided separately, and the total burden then presented.

The Nominating Authorities refine their state-specific (or comparable authority-specific) application and nomination process, solicit applications, review applications, select nominees, and submit documentation of evaluation of the nominees, along with a Nominee Presentation Form, to ED. The schools, districts, and postsecondary institutions review the state-specific application form, collect information to complete the form, and complete and submit documentation to the Nominating Authority. Some states adapt from an ED-provided sample application and their own experience in previous years so that they are not creating their application from the ground up, leading to a decrease in burden over time.

ED does not require a standardized application from all Nominating Authorities because state education agencies require flexibility on their evaluation of nominees to ED. For this reason, so long as state education authorities document evaluation in all three Pillars and all underlying nine Elements of the award, ED does not mandate state applications look a certain way. States have appreciated the flexibility and adapted their award to local needs. Furthermore, there is nothing in our criteria that requires them to run a competition with application process, though nearly all are selecting nominees to ED oversee a competition that requires some sort of application.

In some cases, states turn applications over as-is to ED, along with the coversheet. In a few cases, they work to synthesize and summarize. All Nominating Authorities now use an online submission which has them fill the name of the institution, address, basic demographic data, and contact information, in a form that takes no more than ten minutes per nomination. Up to 30 participating states nominate anywhere from 1-6 nominees, usually closer to 3.

The burden on the school, district, and postsecondary institution applicants varies tremendously from state to state. Some states use their application as a teaching tool, and thus a self-audit, with numerous questions and requests for data. Others are now

asking for three brief narratives, one for each Pillar of our award, and one summary narrative (more in line with ED's sample attached). So the burden on applicants to states could be anywhere from 8-25 hours, depending on the application route a state chooses. The number of applicants to states averages 5, with many states receiving 0-5 and a few, such as California, receiving several dozen.

State nominating authorities spend 15 minutes submitting their online nominations through our online form which is very simple and brief.

The total burden for this activity is 22 hours (90 applications X 15 minutes per response).

The wage of the state employee doing this work varies greatly. Some states leverage the work of non-profits, who do this work free of charge to these state agencies. A wage of \$30 an hour is used in this calculation as an estimate.

Total costs related to this activity is \$660 (22 hours X \$30/hr).

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

There are no such costs to 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 annual cost to the Federal government to implement this information collection is estimated at \$1,110.78. This includes contractor beta testing and web site maintenance, and the salaries and expenses of program staff who manage the process and review the GRS data. The method used to estimate the annual cost is as follows:

Program Office Staff:
 $\$50.49/\text{hr} \times 22 \text{ hours} = \$ 1,110.78$

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).

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden			60

Total Responses			-1,328
Total Costs (if applicable)			

This is an extension of a previously approved information collection request. Burden and responses were adjusted to correct the estimate based on recent data and changes in process. This results in a reduction in burden of 1,328 hours and an increase of 60 responses. Total burden and responses is 22 hours and 90 responses respectively.

- 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.**

We post the nomination packages of states' confirmed nominees on our [website](#) in the spring when we announce honorees. We also use the information they submit to develop a report, also posted on our website on our spring announcement of honorees day. This mainly involves editing narrative text. No complex analytical techniques are used.

- 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 control number, expiration date, and related information will be displayed on the Nomination Presentation Form. We are not seeking this approval.

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

There are no exceptions are requested for this submission.