

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION  
Information Collection OMB Control Number 1894-0001**

**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.*

Section 3505(a)(2) of the PRA of 1995 provides the OMB Director authority to approve the streamlined clearance process proposed in this information collection request. This information collection request was originally approved by OMB in May of 2007. It streamlines the clearance process for all discretionary grant information collections which do not fit the generic application process. The streamlined clearance process continues to reduce the clearance time for the U.S. Department of Education's (ED's) discretionary grant information collections by 60 days. This clearance would allow ED to provide better customer service to grant applicants and help meet ED's goal for timely awards of discretionary grants.

*Improved Customer Service*

The time saved by a streamlined clearance process means an earlier approval of ED's discretionary grant application packages to ensure that they are "on the street" to the waiting public sooner than through a full clearance process. This translates into better customer service to our applicants allowing increased time to complete applications, which ranked high on their list of priorities. In addition, the streamlined clearance process continues to allow ED program staff more time to devote to the actual administration of grants.

*Open Licensing*

As part of a final rule, §3474.20(d) would add that a grantee that is awarded discretionary grant funds must have a plan to disseminate the openly licensed resources that were created in whole, or in part, with Department grant funds.

*Evidence of Effectiveness Form*

The Evidence of Effectiveness form provides a structure for capturing information included in the narrative of an application where evidence is required. This information was previously collected in an appendix to the application. Applicants will be required to complete this form, along with other standard forms as part of their grant application.

*Supporting ED's Goal*

Time saved in this component assists ED in meeting its goal of awarding all discretionary grants on a timely basis. To meet this goal for each fiscal year, ED will award most of its new grants by May.

This is a request to extend the clearance process for discretionary grant information collections, and continue to be streamlined in the following manner: the clearance process begins when ED submits the collection to OMB and, simultaneously, publishes a 30-day public comment period notice in the Federal Register. OMB has 60 days, following the beginning of the public comment period to conclude on the collection.

Under this streamlined clearance process, OMB has 60 days to review each collection. The public would have one comment period instead of two. Since approval of 1894-0001 streamlined discretionary grant process in 2007, one public comment period has proven to be sufficient particularly as it saves 60 days per clearance. This continues to help ED provide better customer service to grant applicants and award all discretionary grants on a timely basis.

*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 collected through the streamlined process provided by grant applicants will be used to make program management and award decisions for funding opportunities provided through ED.

*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.*

Each individual program office (PO) collects additional discretionary grant data providing the program specific information regarding the PO grant application using a method of their choosing. While most grant data is collected through grants.gov, other data may be submitted via email or other means.

*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.*

A review of the current procedures indicated that the requirements are minimal and avoid duplication.

*5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.*

This information collection request does not impact small businesses or 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.

This information collection request enables ED to implement a streamlined clearance process for discretionary grant information collections. This streamlined process will continue to assist ED in providing better customer service to applicants and meeting the ED's goal for discretionary grants. If this collection of information were conducted less frequently, it could impair the department's ability to manage grant programs effectively.

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 above listed special circumstances apply to this information collection request.

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 December 18, 2018 (83 FR 64568). There were no public comments. A 30 day comment period notice will be published.

In the proposed rule, there was no provision covering dissemination. A public comment period was provided to determine whether there should be such a provision in the final rule. Final §3474.20(d) was added as a compromise to the divergent comments, some of which wanted a specific dissemination requirement and others did not want the rule to cover dissemination at all.

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

No payment or gift will be provided to the respondents.

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

No assurance of confidentiality is provided to the respondents.

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.

No questions of a sensitive nature will be asked.

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 not be included in Item 14.

One (1) burden hour will be assigned to this information collection request as a "placeholder". The actual burden estimates for each discretionary grant information collection covered under this plan will be provided in the individual PO submission packages. The addition of the dissemination plan under §3474.20(d) adds no additional burden to this ICR.

The addition of the Effectiveness of Standard Form provides a framework for capturing data contained in the narrative of an application. It is estimating that it will take on average 2 hours to complete this form.

The total number of burden hours and responses is 1 response and 3 burden hours.

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
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Total Annualized Costs Requested	\$ .00

There is no annual cost burden to respondents as a result of this information collection request.

*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 streamlined clearance process does not constitute a significant change in ED's operations. Thus, there will be no additional cost to the Federal government as a result.

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

This is an extension of a previously approved information collection request. There are no changes in burden and responses. The total number of burden and responses is 1 response and 3 burden hours.

*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 results of this information collection request will not be published.

*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 Department is not seeking this approval.

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

There are no exceptions to the certification statement.

## **B. Collection of Information Employing Statistical Methods**

This collection does not employ statistical methodology.