

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.**

This is a request to extend approval of an information collection request that solicits applications from eligible entities for Performance Partnership Pilots for Disconnected Youth (P3).

P3, authorized by section 524 of Title III, Division H of the Consolidated Appropriations Act, 2021 (Pub. L. 116-260), permits the Departments of Education, Labor, Health and Human Services, and Justice; the Corporation for National and Community Service; and the Institute of Museum and Library Services (the Agencies) to enter into up to 10 Performance Partnership Agreements with State, local, or Tribal governments to provide additional flexibility in using certain of the Agencies' FY 2021 discretionary funds. The Act further authorizes the Agencies to grant waivers of Federal requirements (with certain safeguards) in order to support the projects proposed by the entities with which the Agencies will enter into these agreements. Entities that seek to participate in these pilots are required to commit to achieving significant improvements in education, employment, and other key outcomes for disconnected youth in exchange for this new flexibility. Programs that may be included in pilots are limited to those that target disconnected youth or are designed to prevent youth from disconnecting from school or work, that provide education, training, employment, and other related social services. The statute defines "disconnected youth" as "individuals between the ages of 14 and 24 who are low-income and either homeless, in foster care, involved in the juvenile justice system, unemployed, or not enrolled in or at risk of dropping out of an education institution."

P3 was originally recommended in President Obama's budget request for FY 2014 as a strategy to promote innovation and improve coordination in delivering services to disconnected youth. It was included in the FY 2014 appropriations statute and has been included in every subsequent appropriations statute since that time. The appropriations for FY 2022 is currently pending. The Department intends to publish a notice inviting applications if the authority is extended.

- 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 will be used in several ways. First, it will be used by peer reviewers and ED to assess the extent to which an applicant meets the priorities, requirements, and selection criteria of the P3 competition. ED will generate a rank-order list of applications based on the average scores awarded by peer reviewers. The information provided in the top-ranked applications will then be assessed by the applicable agencies to determine

whether the waivers sought by these applicants may be granted. Once the entities with which agreements will be established are identified, the information will be used to inform the development of these performance agreements. In addition, the agencies will use the information obtained through this collection to prepare summaries of the projects that will be carried out for dissemination to members of Congress and the general public. Finally, the agencies will use this information to monitor the progress of each entity awarded P3 authority.

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.**

Applicants will be required to submit their applications electronically.

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.**

This is a unique information collection request. It does not duplicate any other collection.

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.**

Small entities that may apply for the P3 authority include local governments from rural areas and small towns and Indian tribes. The efforts to reduce burden described in response to the Question 8 benefit 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.**

The agencies would be unable to implement the P3 authority if this collection is not carried out.

**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.**

None of the special circumstances listed above apply. This collection is consistent with 5 CFR 1320.5(d)(2).

**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 published a notice of proposed priorities, requirements, definitions, and selection criteria (NPP) in the Federal Register on October 22, 2015 (80 FR 63975). Eleven parties submitted comments on the proposed priorities, requirements, definitions, and selection criteria. ED published a notice of final priorities, requirements, definitions, and selection criteria (NFP) in the Federal Register on April 28, 2016 (81 FR 25339). In response to public comment, in the NFP we reduced burden on applicants by removing several application requirements that had been proposed in the NPP. We further reduced burden on applicants by declining to use several of the application requirements established in the NFP in notices inviting applications for FYs 2018 and 2019 so that applications need not be any longer than 15 double-spaced pages. In the FY 2021 notice inviting applications, we reduced burden on applicants and we recommended that applications be no longer than 5 double-spaced pages.

We received no public comments during the the 60-day comment period that ended on May 9, 2022 after publishing a notice in the Federal Register on March 10, 2022. No changes have been made to this information collection request. We are submitting the collection request to the Federal Register for a 30-day public comment period.

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

Respondents will not be provided any payments or gifts for 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.<sup>1</sup> If the collection is subject to the Privacy Act,**

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<sup>1</sup> 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

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.

The Department is not requesting any confidential information, so no assurances of confidentiality are necessary.

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.**

There are no questions of a sensitive nature.

12. **Provide estimates of the hour burden for this current information collection request. The statement should:**

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **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. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. 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. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

**Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.**

We anticipate that 15 entities will submit applications for P3 authority for each of the next three fiscal years and that preparing these applications will take each applicant, on average, 80 hours at a cost of \$63.96, the mean hourly compensation cost for State and local government workers who were in management, professional, and related occupations in September 2021. We thus estimate that the total number of hours for all respondents to prepare applications to be 1,200 hours and the total annual cost of doing so to be \$76,752. Over the course of the next three years, the estimated burden is 3,600 hours and the estimated cost is \$230,256.

**Estimated Annual Burden and Respondent Costs Table**

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)
state, local or tribal governments			15	15	80	1200	\$63.96	\$76,752
Annualized Totals			15	15		1200		\$76,752

***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.***

- 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 start-up costs for this collection.

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 Federal costs will involve providing technical assistance to prospective applicants, screening the applications, carrying out the peer review of applications, assessing the merits of the waivers sought by the top-ranked applicants, and negotiating performance agreements. The Department estimates that conducting these activities will require the following for each of the three years that competitions will be carried out:

<b>Federal Staff</b>	<b>Estimated Hours Required</b>	<b>Rate</b>	<b>Estimated Annual Cost</b>
Grade 14	400	\$66.54	\$26,616
Grade 15	400	\$78.27	\$31,308
<b>Annualized Total</b>			<b>\$57,924</b>

The total cost to the Government over the course of three years is thus anticipated to be \$173,772.

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.**

	<b>Program Change Due to New Statute</b>	<b>Program Change Due to Agency Discretion</b>	<b>Change Due to Adjustment in Agency Estimate</b>
<b>Total Burden</b>			<b>-10</b>
<b>Total Responses</b>			<b>-800</b>
<b>Total Costs (if applicable)</b>			<b>0</b>

The previously approved annual burden was 2,000 hours with an estimate of 25 respondents. There is a reduction in total burden hours a result of a reduction in the agency estimate of the number of respondents. Based on the Department's experience administering this authority, an estimate of 15 respondents annually is more likely than the earlier estimate of 25 respondents annually. In the previous three competitions (FYs 2015, 2016, and 2017), the numbers of respondents were 45, 14, and 20, respectively. In response to the FY 2021 notice inviting applications, the Department received two applications.



- 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 Department may publish on its website the applications of the entities with which performance agreements are established.

- 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 expiration date will be displayed on the 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 identified in the "Certification for Paperwork Reduction Act Submissions" Form.