

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 collection of this information is part of the government-wide effort to improve the performance and accountability of all federal programs, under 34 CFR 75.210, the Uniform Guidance, and the Education Department General Administrative Regulations (EDGAR). A process for using performance indicators to set program performance goals and to measure and report program results was established. The U.S. Department of Education (ED) developed performance measures at every program level to quantify and report program progress required by the Elementary and Secondary Education Act of 1965, as amended (ESEA). Under the Uniform Guidance and EDGAR, recipients of federal awards are required to submit performance and financial expenditure information. The program-level measure (established under Section 4625(4)(C) of ESEA), the 13 additional program indicators (established through a Notice of Final Priorities, Requirements, Definitions, and Selection Criteria published in the Federal Register on July 13, 2022 (87 FR 41675)), and budget information for the Full-Service Community Schools (FSCS) Program are reported in the Annual Performance Report (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 FSCS 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 one or more local educational agencies (LEAs) or the Bureau of Indian Education (BIE) and one or more community-based organizations, nonprofits organizations, or other public or private entities. 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 the one performance measure and the 13 performance indicators, as

outlined below. Distributing the APR to all FSCS grantees will enable the collection of responses and data concerning these 13 measures and indicators.

FSCS Performance Measure: Provision of services to students, families, and community members and individuals

FSCS Performance Indicators:

1. Student chronic absenteeism rates;
 2. Student discipline rates, including suspensions and expulsions;
 3. School climate information, which may come from student, parent, or teacher surveys;
 4. Staff characteristics, including information on the number, qualifications, and retention of school staff, including the number and percentage of fully certified teachers, disaggregated by race and ethnicity, rates of teacher turnover, and teacher experience;
 5. Changes in school spending information;
 6. Graduation rates;
 7. Provision of integrated student supports and stakeholder services;
 8. Expanded and enriched learning time and opportunities;
 9. Family and community engagement efforts and impact;
 10. Collaborative leadership and practice strategies, which may include building the capacity of educators, principals, other school leaders, and other staff to lead collaborative school improvement structures, such as professional learning communities;
 11. Regularly convening or engaging all initiative-level partners, such as LEA representatives, city or county officials, children's and youth's cabinets, nonprofit service providers, public housing agencies, and advocates;
 12. Organizing school personnel and community partners into working teams focused on specific issues identified in the needs and assets assessment; and
 13. Regularly assessing program quality and progress through individual student data, participant feedback, and aggregate outcomes to develop strategies for improvement.
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.**

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 for 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 ED 524-B. 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, 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.**

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 performance 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 performance 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 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 is no special circumstance that would require the collection to be conducted in a manner inconsistent with OMB guidelines.

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.

On June 8, 2023, ED published a 60-day notice in the *Federal Register* (88 FR 37522) and will publish a 30-day notice in the *Federal Register* notice. During the 60-day comment period we received six comments. Responses to those comments are in a separate document. ED will also hold a feedback session on the published reporting guidance at the National Community Schools and Family Engagement Conference on June 9, 2023, which included FSCS grantees and other stakeholders.

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

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. 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.

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.

There are no questions of a sensitive nature on the APR. Respondents are asked to report on project measures, indicators, and objectives; identify participating school districts and schools; identify project partners; describe the evaluation of their project;

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)

report on project activities and progress during the reporting period; and report on budget expenditures.

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.

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.

Forty-two grantees will be required to report annually on their progress through the 2027-2028 school year. As additional grants are awarded in fiscal years 2023 and future years, we expect an estimated 100 grantees will submit annual reports using these forms and guidance.

We estimate that it will take a FSCS grantee project director a total of 9 hours to complete the form. This estimate includes 2 hours to complete the online reporting

form. We also include time needed to review the FSCS Performance Reporting Guidance, estimated at one hour. We expect the remaining 6 hours of project directors' time to consist of the following: (1) organizing information about project progress and expenditures, estimated at 1 hour; (2) preparing a description of the project; (3) providing contact information about the project; and (4) corresponding with partner staff to obtain information, estimated at 5 hours.

Assuming an hourly rate of \$47.99², the estimated annual cost per respondent to complete the online reporting form is \$431.91 during the reporting periods.

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)
Annual Performance Report Nonprofit, BIE, or LEAs			100	1	9		\$47.99	\$431.91
Annualized Totals			100	1		900	\$47.99	\$43,191.00

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;**

²²The mean hourly wage for Education Administrators, All Others was \$47.99 as reported in May 2022 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.

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.

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 FSCS 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. 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).

This is a new collection of information that will result in 100 responses and 900 burden hours annually.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden		900	
Total Responses		100	
Total Costs (if applicable)			

- 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 number and expiration date will be displayed on the data collection 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.