Tracking and OMB Number: 1810-new

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 request is for a new OMB approval to collect the Grant Profile data from Charter School Programs (CSP) Developer grantees.

The Charter School Programs (CSP) was originally authorized under Title V, Part B, Subpart 1, Sections 5201 through 5211 of the Elementary and Secondary Education Act (ESEA) of 1965, as amended by the No Child Left Behind (NCLB) Act of 2001. For fiscal year 2017 and thereafter, ESEA has been amended by the Every Student Succeeds Act (ESSA), (20USC 7221-7221i), which reserves funds to improve education by supporting innovation in public education and to: (2) provide financial assistance for the planning, program design, and initial implementation of charter schools; (3) increase the number of high-quality charter schools available to students across the United States; (4) evaluate the impact of charter schools on student achievement, families, and communities, and share best practices between charter schools and other public schools; (5) encourage States to provide support to charter schools for facilities financing in an amount more nearly commensurate to the amount States typically provide for traditional public schools; (6) expand opportunities for children with disabilities, English learners, and other traditionally underserved students to attend charter schools and meet the challenging State academic standards; (7) support efforts to strengthen the charter school authorizing process to improve performance management, including transparency, oversight and monitoring (including financial audits), and evaluation of such schools; and (8) support quality, accountability, and transparency in the operational performance of all authorized public chartering agencies, including State educational agencies, local educational agencies, and other authorizing entities.

The U.S. Department of Education (ED) is requesting authorization to collect data from CSP grantees within the Developer program through a new online platform. In 2022, ED began development of a new data collection system, the Charter Online Management and Performance System (COMPS), designed specifically to reduce the burden of reporting for users and increase validity of the overall data. This new collection consists of questions responsive to the actions established in the program's final rule published in the Federal Register on July 6, 2022, as well as the Developer program Notice Inviting Applications (NIA). This collection request is a consolidation of all previously established program data collection efforts and provides a more comprehensive representation of grantee performance.

OMB Reporting History and Legislative Authority
The legislative authority for ED to collect the data contained within the Annual Performance Reports (APR) and the Education Department's General Administrative Regulation (EDGAR). Data collected for the Developer Grant Profile will be used as a baseline to measure grant performance in grantees' APRs.

Based on the goals and objectives of the CSP, ED is seeking approval to collect information to better track implementation and ensure compliance with program statute and other relevant authorities. ED seeks to collect descriptive information about program operation from each grantee.

Grant Profile Data Collection
Developer grantees will complete the following sections of the Grant Profile:

- Assurances
- Key Program Activities
  - Competition Priorities
  - Racially and Socio-Economically Diverse Schools
  - Project Objectives and Performance Measures
- Governance and Management
- Enrollment Projections
- Lottery
- Charter Approval and Management Organization Relationships
- Indirect Costs
- Approved Budget
- Waiver Requests

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.**

Data collection activities are designed to capture quantitative and qualitative data that represent grantees' baseline data from which to measure program implementation and performance outcomes in subsequent APRs. The purpose of the information collected is to capture a snapshot of grantees' grant project proposed activities and goals that were included in their approved grant application.

The audiences for these data include:

- ED program staff, to obtain descriptive information about the use of the CSP funds and respond to data calls from ED decision makers and Congress.
- Congress, to monitor program progress.

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.

COMPS is a web-based system. Authorized grantee users submit their Grant Profiles using this system once at the beginning of their grant. Only if grantees seek and receive approval for modifications to their grant project as approved in their original grant application will they need to make updates to the Grant Profile. Data captured within the Grant Profile are fed into grantees' APRs. This process allows the Grant Profile to serve as the single source of truth for grantees' APRs, and eliminates the need to update grant project information in multiple places.

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 COMPS reporting system collects all performance data from grantees and is the only mechanism by which data are collected to produce an APR to Congress on the status of all CSP programs. Information captured in the Grant Profile will be pre-populated in grantees' APRs, reducing the burden of grantees' APR submissions. The information is not collected by any other means to report to the Federal government; therefore, there is no duplication.

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.

The collection does not impact 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.

Without the data collection, ED could not report accurate and reliable program-level data to Congress or approve continuation funding for individual grantees. The Grant Profile serves as the baseline for subsequent APRs that provide data on the status of the funded project that corresponds to the priorities and requirements 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.**

None of these special circumstances are applicable.

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 facilitates several channels of consultation with stakeholders and authorized system users on the availability of data, frequency of collection, the clarity of instruction and recordkeeping, disclosure, and reporting format (other than that which is required by Congress). The Department hosts regular listening sessions and technical working group meetings each year to consult with stakeholders. In addition, the Department sponsors a help desk where authorized users can submit questions and suggestions for reduced burden and improved efficiency.

The CSP also held four targeted feedback webinar discussions with the pilot cohort of grantees and that allowed them to provide input on the Grant Profile content. Based on the given feedback, adjustments were made to the content questions and platform to make them more user-friendly.

On August 30, 2023, a Federal Register Notice requesting public comment was published (Vol. 88, No. 167, page 59881). No comments were received during the 60-day comment period. The Department is publishing the applicable 30-day Federal Register notice to request public comment.

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

There are no payments or gifts provided to respondents.

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.

Under the COMPS PTA/PIA (signed 3/22/2023), we submitted and received approval for the following PII: Name, email address, phone number (optional), username, and password. These data are self-reported by CSP Federal employees, contractors, and grantees, and captured when new accounts are added to the system. The information is

[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)

necessary in order to create unique logins for authorized Department staff, contractors, and grantee users. Grantees are responsible for following their Federal and State laws. Grant Project Directors, who will use COMPS, are made aware of privacy rights, expected consent, and the use of PII in G5.

The COMPS system will provide a privacy notice when they log into the application. The language below is the excerpt that will be provided:

> **Privacy Act Information**
> You must read the statement below and click "Continue' to access the Department of Education's COMPS website. Some users may need to scroll to the bottom of the screen to see the "continue" button. This is a United States Department of Education computer system, which may be accessed and used only for official Government business by authorized personnel. Unauthorized access or use of this computer system may subject violators to criminal, civil, and/or administrative action. This system contains personal information protected under the provisions of the Privacy Act of 1974, 5 U.S. C 552a as amended. Violations of the provision of the Act may subject the offender to criminal penalties.
>
> Please reference the Department's privacy notice for more information: https://www2.ed.gov/notices/privacy/index.html

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 are asked in this system.

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.

Grantees will be required to submit their Grant Profile information in a web-based format.

The average respondent burden for the Grant Profile module is estimated to be 8 hours per grantee, including 4 hours preparing the data and 4 hours entering the data. The preparation of data entails readying it for entry into COMPS. COMPS entry includes reading instructions; entering all required data; and completing and submitting the online forms. We estimate that grantee staff will earn, on average, $40 per hour. The total burden is estimated as follows:

40[2] grantees x 8 hours per grantee = 320 hours
Total estimated cost for grantee time = $12,800 (320 x $40 per hour)

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)
Complete Grant Profile			40	40	8	320	40	$12,800
Annualized Totals			40	40	8	320	40	$12,800

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.

[2] The number of current active Developer grantees is 36.

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 costs that meet the criteria for inclusion under this item.

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.

Records Management	$150,929.00
Compliance with ED IT Security Policy	$177,028.00
Internet Protocol version 6 (IPv6) And Transport Layer Security	$6,187.00
Reporting of Data Security Breaches	$13,858.00
IT Accessibility Requirements	$15,472.00
Managing Controlled Unclassified Information (CUI) Requirements	$8,476.00
Safeguarding Personally Identifiable Information (PII) Requirements	$8,476.00
TOTAL ESTIMATED COSTS	**$380,426**[3]

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.

ED's authorized development of a new data collection system, COMPS, is designed specifically to reduce the burden of entry for users and increase validity of the overall data. The program changes are a result of updated priorities and requirements for the CSP. This new collection will result in a total new burden of 320 hours and 40 responses from the public.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden		**320**	
Total Responses		**40**	
Total Costs (if applicable)			

[3] These estimated costs are inclusive of the Grant Profiles and APRs for the State Entity (SE), Developer, and CMO program data collected within COMPS.

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.

Developer Grant Profile data will be collected once during the post-award process in the beginning of a grantee's grant project. If grantees' projects receive approval for amendments during their performance period, grantees will make updates to their baseline data in the Grant Profile as necessary.

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.

Approval to not display the expiration date for OMB approval is not sought.

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

There are no exceptions to the certification statement.