

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 Comprehensive Literacy State Development (CLSD) program is authorized under the Elementary and Secondary Education Act of 1965, as amended (ESEA) [Public Law 115–224], Sections 2222-2225 of the ESEA. The CLSD program awards competitive grants to advance literacy skills—using evidence-based practices, activities, and interventions, including preliteracy skills, reading, and writing—for children from birth through grade 12, with an emphasis on disadvantaged children, including children living in poverty, English learners, and children with disabilities. Eligible entities include the state education agencies (SEAs) of the 50 states, the District of Columbia, and Puerto Rico. Additionally, directed awards are made to four (4) Outlying Areas: American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, and the U.S. Virgin Islands. A portion of funds is also awarded directly to the Bureau of Indian Education.

In fiscal year (FY) 2019, the U.S. Department of Education’s (ED) Office of Well-Rounded Education (OWRE) awarded competitive grants to thirteen (13) SEAs in the following states: Alaska, Arkansas, California, Georgia, Hawaii, Kentucky, Louisiana, Minnesota, Montana, New Mexico, North Dakota, Ohio, and Rhode Island. In FY 2020, eleven (11) competitive grants were awarded to SEAs in Arizona, Colorado, the District of Columbia, Florida, Louisiana, Massachusetts, Michigan, Missouri, Tennessee, Texas, and Wyoming. The CLSD program is requesting approval from the Office of Management and Budget (OMB) for a new information collection request for a program specific CLSD performance report. Currently, OWRE utilizes ED’s OMB-approved generic grant performance report (OMB #1894-0003) to collect annual and final performance data for CLSD. The proposed program specific CLSD performance report will consist of similar metrics as ED’s generic grant performance report, including the following sections: resources, cover sheet, executive summary, project-specific performance measures (PSPMs), state-level activities, subgrantee competition information, subgrantee details, subgrantee activities, and budget information.

CLSD requires that at least 95% of funds awarded to SEAs be distributed to local education agencies through a subgrant award process. However, the current OMB-approved ED generic grant performance report does not include fields to capture program (subgrantee) demographic data or performance measures to ensure grantees are meeting statutory and regulatory requirements and making progress toward meeting the goals and objectives of their approved projects. The proposed performance report metrics reflect the need to collect pertinent grantee- and subgrantee-level data that could be used to guide future program policy and practice and respond to stakeholder, congressional, and agency inquiries. Thus, the CLSD program staff would better understand whom they serve, programmatic needs, strategies to meet those needs, and how collecting program-level data would benefit the students and support their learning. The new CLSD performance report metrics would (a) collect programmatic data that demonstrate aggregate program-level impact; (b) provide subgrantees’ aggregated data, such as the number of

students and professionals served, how funds have been used (e.g., professional learning, curricular materials), and staffing; and (c) provide the CLSD program staff the data to report the performance and outcomes of the CLSD program, at both the grantee and the subgrantee levels. These new measures also would help to add specificity to ED's monitoring efforts.

In addition, the program office is requesting approval the CLSD Project Budget Workbook. This budget tool was created in response to feedback from our grantees who had difficulty completing their budgets in a Word document. The tool will allow grantees to track the budget over the lifecycle of the grant. An additional benefit of the tool is that it allows all grantee budget data, including any budget revisions, to be located in one file. Use of this Workbook will alleviate issues that arise when there is personnel turnover at the State Education Agency (SEA). New project directors will be able to easily locate not just current budget information, but also have historical information as well on changes, approvals, etc. that will allow for a more seamless transition from one project director to the next.

This request represents a major step in the CLSD program's efforts to improve its ability to assess its grantees' impact and use data collected from its discretionary grant portfolio to enhance grantee performance and improve Americans' literacy. Approval of this information collection would help the CLSD program staff continue to meet the reporting requirements—quantifying the effects and accomplishments of its discretionary grant programs, consistent with OMB guidance.

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 gathered as part of the performance report process would be used by CLSD program staff to (1) track the performance, outcomes, and budget expenditures of the grantees receiving CLSD funds; (2) identify the strengths, challenges, and needs of grantees; and (3) gather demographic information about subgrantees. These data would be used by the CLSD program office to inform the design, implementation, and performance of various technical assistance (TA) strategies, such as convenings, communities of practice, products, resources, and web content.

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.**

Since FY 2019, CLSD grantees have used a password-protected knowledge management system (KMS) to enter and manage data such as PSPMs, performance, and budget updates. The rationale for developing the KMS was to create an alternative to submitting performance reports into the G5 system, including the ability to (a) customize or add data elements, (b) provide grantees a regularly scheduled timeline (e.g., quarterly) for entering both performance and budget data to ease annual reporting requirements, and (c) reduce the burden for grantees by

streamlining reporting elements into one reporting hub housed within the larger CLSD website. The KMS will be enhanced and modified to improve the ability for grantees to enter data. The CLSD program office is working with a technical working group to ensure that the KMS will function as a user-friendly system for grantees. For example, it allows information previously entered to be auto-populated in future submissions.

In addition, the Excel budget tool has been created to reduce the burden on grantees when submitting budget information as part of the APR and Ad Hoc APR. Currently grantees must use the Word version of the ED 524B. The program office has noted that, in past Grantee Satisfaction Surveys, respondents complained about using a Word document for a budget. The Excel budget tool uses the same line items but will allow grantees to utilize formulas embedded in the spreadsheet to automatically calculate figures and reduce errors.

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 new CLSD metrics would provide additional grantee data currently not collected and data at the subgrantee level. This would not duplicate any existing data 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.

There are no small businesses or entities involved in this request.

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 program office is seeking additional grantee and subgrantee data necessary for monitoring and compliance. If this information were to be collected less frequently, the program office would not be able to ensure that statutory and regulatory requirements are met.

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.**

This information collection does not have any special circumstances.

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 September 27, 2023 (88 FR 66434) the Department published a 60-day comment notice requesting feedback from the public. During the 60-day comment period we received one comment to which we have responded in a separate document. The Department will publish 30-day notice in the Federal Register.

Eight current grantees served on a working group to provide input on the proposed information collection. Selection considerations for grantees in the working group included grantee cohort; total number of students enrolled (K-12); percentage of students who are served by special education programs; percentage of students who are English learners; number of subgrantees; and the region of the United States. Table 1 illustrates the extent of broad representation across the category groups named above. These grantees reported a higher than average (compared to other grantees) percentage of students for at least two of the following: student population size, special education, English learners, and state size. In addition, most grantees had combination geographical makeups reflecting a mix of rural, suburban, and urban communities and varied by region of the United States. The 2019 and 2020 CLSD cohorts were represented equally on the working group.

Table 1. Demographics of States Represented on the Working Group

State	Total Student Population*	Percentage of English Learners*	Percentage of Students Served by Special Education Programs*	Geographic Size (sq. mi.)**
1	1,111,500	7	13	113,990
2	89,883	12	16	68
3	693,150	4	13	52,378
4	872,083	9	17	86,936
5	146,252	2	13	147,040
6	1,645,412	4	16	44,826
7	139,184	12	17	1,545
8	5,372,806	20	12	268,596

Source:

*U.S. Department of Education, National Center for Education Statistics, Common Core Data (<https://nces.ed.gov/ccd/>)

**U.S. Census Bureau (<https://www.census.gov/geographies/reference-files/2010/geo/state-area.html>)

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

There is no monetary compensation for participants.

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.**

Confidentiality is not assured as part of this information collection.

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 would be asked in the updated performance report metrics.

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-**

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)

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.

The number of participants in subsequent years is estimated to be the same, resulting in the same annual burden estimate for those years. Grantees use the KMS to input project-specific performance measures, targets, and performance data. The PSPM Chart in the KMS will be completed one-time by grantees at the start of the project. Annual performance targets and performance reporting data are submitted annually.

The Excel Budget Tool will be updated twice per year by all grantees and uploaded with the APR and Ad Hoc APR.

The table below highlights that grantees submit annual data for PSPMs, which demonstrate progress in project implementation in the spring, and reporting data, largely based on results on statewide assessments, in the late fall. The estimates reflect the maximum annual burden for the proposed revised annual performance report (APR). The annual burden for each respondent to complete the APR is based on an estimated eight (8) hours to collect data for each entry and one (1) hour to complete each APR form, and an estimated two (2) hours to complete the Excel budget tool.

The estimates, based on current program expectations and plans for FY 2024, were calculated based on the working groups described in section A8.

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 (APR)	N/A	2	29	58	9	522	\$35.69	\$18,630.18
Excel Budget Tool	N/A	2	29	58	2	116	\$35.69	\$4,140.04
Annualized Totals		2	29	58	11	638	\$35.69	\$22,770.22

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	:\$500
Total Annual Costs (O&M)	:\$500
Total Annualized Costs Requested	:\$1,000

This estimate is based on the annual cost to maintain Google workspace tools which several working group participants indicated is the method they use to gather and house data from subgrantees.

- 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 cost to add the new fields would be approximately \$10,000 of contractor time, which is aligned to the projected statement of work in the current contract. There would be an annual maintenance or operating cost of \$3,000.

- 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.

This is a new collection that will provide more data about our grantees and subgrantees (at least 95% of all CLSD grant funds must be subgranted). With this information the CLSD program

staff will be able to better (1) track the performance, outcomes, and budget expenditures of the grantees receiving CLSD funds; (2) identify the strengths, challenges, and needs of grantees; and (3) gather demographic information about subgrantees. These data would be used by the CLSD program office to inform the design, implementation, and performance of various technical assistance (TA) strategies, such as convenings, communities of practice, products, resources, and web content.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden		638	
Total Responses		58	
Total Costs (if applicable)		\$1,000	

- 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.**

Data are only reported to ED for use by the CLSD Program staff. Any information shared with grantees or the wider field will be presented in the aggregate by cohort and will not name specific SEAs/grantees.

- 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 for OMB approval is to be displayed on all data collection instruments.

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

This collection of information involves no exceptions to the Certification for Paperwork Reduction Act Submissions. The certifications are included in this submission.