

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 U.S. Department of Education (ED) supports a wide range of discretionary grants to eligible applicants including State Education Agencies, Local Education Agencies, Indian Tribal Governments, Institutions of Higher Education, Non-Profit Organizations, Faith-Based Organizations, Businesses, Hospitals and Individuals. Discretionary grants are awarded on the basis of competitively reviewed applications, and ED is requesting an extension for the Generic Application Package that numerous ED discretionary grant programs use to provide to applicants the forms and information needed to apply for new grants under those grant program competitions. The EDGAR selection procedures and criteria have been amended since the last time this generic application package ICR was approved, so changes have been made to this supporting statement to reflect the updated regulations. See: 34 CFR 75.209 as revised, 78 FR 49338, at 49353, August 13, 2013.

The Department will use this Generic Application package for discretionary grant programs that: (1) Use the standard ED or Federal-wide grant applications forms that have been cleared separately through OMB under the terms of this generic clearance as approved by OMB and (2) use selection criteria from the Education Department General Administrative Regulations (EDGAR); selection criteria that reflect statutory or regulatory provisions that have been developed under 34 CFR 75.210, 34 CFR 75.209, or a combination of EDGAR, statutory or regulatory criteria or other provisions, as authorized under 34 CFR 75.200 and 75.209. The use of the standard ED grant application forms and the use of EDGAR and/or criteria developed under §§75.200 and 75.209 promotes the standardization and streamlining of ED discretionary grant application packages. This request reflects a burden estimate for grant competitions from several program offices including: Office of Elementary and Secondary Education, Office of Innovation and Improvement, Office of English Language Acquisition, Office of Special Education and Rehabilitative Services, Office of Postsecondary Education and the Institute of Education Sciences.

Since approval by OMB in December 2001, the 1894-0006 Generic Grant Application is the most streamlined ED process for OMB approval of discretionary grant application packages, including new or existing discretionary grants. There are no required public comment periods for new individual grant applications since the Master Plan ICR provides the public opportunity to comment.

Program offices may submit any new individual discretionary grant applications for inclusion under this process that can include criteria from EDGAR; criteria from statute; previously approved program specific criteria that received OMB approval through an ICR's comment period. Please refer to the attached OGC memo for generic grant allowances for further detail.

POCs may include NPPs or NIAs with selection criteria with generic allowances; this is acceptable under the generic with EDGAR, statutory or previously approved program specific

criteria. The grant application cannot include program specific forms or additional information requirements outside the generic. Selection criteria established using the GEPA waiver need to be EDGAR or statutory based. New selection criteria would need an accompanying ICR for OMB approval outside the generic.

If an application package involves program-specific forms that are required for an application but are not covered by the standard ED or Federal-wide grant applications forms, the program office may not use the generic application clearance process and must go through the streamlined discretionary grants clearance process

Differences in any new individual grant application packages added under the Generic Application Package collection after this Master Plan request is approved would be reflected in the official application notices for each program competition published in the Federal Register and the information provided about the program in the discretionary grant application packages. Notices of priority and official application notices are cleared through the Department's Division of Regulatory Service in the Office of General Counsel and public comment is sought when required. The information contained in the official application notice and/or application packages may include background information on the program and grant competition, priorities, statutory and regulatory developed under EDGAR, EDGAR selection criteria or combinations of these criteria.

To obtain OMB approval for a new generic grant application not included as part of this Master Plan submission, ED submits the request via the OMB83C (change worksheet) process in ROCIS with the individual added burden hours added to the cumulative total already approved. In addition, a copy of the draft application notice ("Notice Inviting Applications") and any associated notice of priorities are submitted with this request. Based on the original OMB/ED agreement, the clearance time for a new generic grant submission is 10 days at OMB. **(Note that ED suggests using this language as the Terms of Clearance.)**

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.

A listing of the standard ED or Federal-wide grant application forms and relevant EDGAR selection procedures are attached. These application components are necessary to standardize grant applications and to ensure that the information required to process and review them effectively and to make funding decisions is submitted by applicants. The amendments to EDGAR also improved the Department's ability to focus selection criteria on statutory and regulatory provisions while still maintaining the standardization offered by the EDGAR criteria

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.

Grant applications are submitted via Grants.gov.

- 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 information collection is intended to serve as a generic application package for use by numerous discretionary grant programs from across the Department's grantmaking offices. Use of the standard ED or Federal-wide grant application forms and selection criteria that is already established in the Department's EDGAR regulations or based on the existing program statute or regulations encourages ED program offices to utilize standard forms and criteria based on provisions that the public has already had the opportunity to comment on previously and eliminates the need to develop and clear program-specific forms and regulatory selection criteria.

- 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.**

Under EDGAR regulations, all requirements for small entities are minimized. Burden is kept to a minimum by requesting that applicants provide only information required by statute and EDGAR.

- 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 administration, determination and distribution of program funds could not be accomplished if the information was collected less frequently. The frequency of the application is mandated by the respective legislation and program regulations and the availability of ED funding for new grant competitions. In virtually all cases, the competition for each program is conducted only once a year.

- 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.

The information collections submitted under this generic clearance would not implicate any of the standards listed in question 7 and would not be collected in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

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.

A 60-day notice was published in the Federal Register on September 27, 2023 (88 FR 66434). No public comments were received. A 30-day notice will be published.

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 to respondents other than the remuneration of grantees.

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 provided to respondents using 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.

There are no questions of a sensitive nature.

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)

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.

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)
Grantees			9,861	9,861	45	447,089	\$38.61	\$17,262,106.29
Annualized Totals			9,861	9,861		447,089		\$17,262,106.29

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.

The listing of the individual programs that will use the Generic Application Package and their respective burden hours are shown in the supplementary section document entitled, "Discretionary Grant Programs Using the Generic Application Package." The total burden hours for all ED programs using the generic application package are 447,089 hours with a respondent total of 9,861 hours.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and 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 other respondent costs beyond those provided under item 12.

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.**

Review by program staff

(1800 funded grants X 4 hours x \$38.61 per hour (GS-12 hourly rate [fully-loaded])....\$277,992.00

Review by outside reviewers.....\$7,767,115.00

[Based on historical cost data from previous competitions and cost estimates for future competitions.]

Total.....\$8,045,107.00

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.

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

This is an extension of a previously approved information collection request. There are no changes in burden or responses. We will monitor the number of competitions that rely on the EDGAR selection procedures and criteria over the course of time that this ICR is approved and involve OMB as new programs are added to the list of those that rely on this generic ICR. There is some possibility that more program offices will be able to use the EDGAR selection procedures and criteria than in the past due to the recent amendments to 34 CFR 75.209, which we expect would make using the EDGAR procedures and criteria available to more program competitions.

The total number of burden and responses is 9,861 responses and 447,089 hours.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The Department of Education does not publish this data or use statistical methods in this collection of 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.**

OMB approval of this information collection with both the OMB Control Number and Expiration Date will be displayed.

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

There are no exceptions to the Certification Statement.

B. Collection of Information Employing Statistical Methods

Not applicable, this collection does not employ statistical methods.