

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 Bipartisan Safer Communities Act (BSCA) provided \$1 billion in funding to State educational agencies (SEAs) to be distributed under Title IV, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). The BSCA specified that SEAs must make competitive subgrants to high-need local educational agencies (LEAs), as determined by the SEA, for activities that support safe and healthy students under section 4108 of the ESEA. The U.S. Department of Education Department designated BSCA section 4108 funds as the Stronger Connections Grant (SCG) program.

This is a revised information-collection request for the SCG program's performance report requirement. Under the Department's General Administrative Regulations (EDGAR, Section 75.720), grantees must submit annual performance reports unless the Secretary allows less frequent reporting. Accordingly, this information collection request removes the annual reporting requirement and replaces it with a final report.

Additionally, this revised information collection request reduces the number of proposed data items to be collected from grantees in their final report. This change decreases reporting burden by 34,366 hours (from 40,636 previously to 6,270 in this request). This revised request also ensures that SEA grantees provide only the critical information needed, including: 1) the identification of the LEAs awarded SCG funds, and 2) how the SEA and its LEAs used SCG funds. This proposed information collection request balances reducing burden on grantees while collecting the essential information included in Attachment A for non-unitary systems and Attachment B for unitary systems.

This revised information collection reduces grantee burden by requiring only a final report and decreases the number of questions for non-unitary and unitary systems. The revised information collection will only ask for the most critical data, such as the amount of funds used to support subawards to high-need LEAs.

- 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 Department uses the information collection to (1) assess and report on individual program performance; (2) monitor States' implementation of and compliance with the program requirements; (3) identify areas for technical assistance to States and overall program improvement; (4) inform policy and program improvement; and (5) provide information to Congress on the uses of funds and performance of the program.

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 Department will use an Excel file to collect responses.

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 SCG program is a unique grant program and this information collection includes program-specific information that is not publicly available or collected through a different information collection.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

Small businesses or other small entities are not impacted.

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.**

If the information is not collected the Department is unable to meet statutory and regulatory requirements related to oversight of grantees' activities and outcomes.

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.

No special circumstances exist that would cause the information collection to be conducted under any of the circumstances described above.

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 and a 30-day comment period will be conducted to collect comments from the public.

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

No payment or gift of any kind will be 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.<sup>1</sup> 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.**

The data collected through the SCG program does not contain information on students. These data describe how SGA funds are used at the SEA and LEA-levels. These data are not subject to FERPA or the Privacy Act.

There is no assurance 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.**

The information collection does not include questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly

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<sup>1</sup> Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB 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).

considered private. The education data collected will only consist of information about states, LEAs, and schools.

**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.**

The calculation of the estimated annual burden is based on the following assumptions:

- All 50 States, the District of Columbia, Puerto Rico, and Territories will collect and report data.
- SEAs are responsible for awarding grant funds to their LEAs and all SEAs have completed the award process. The number of LEA respondents is approximate.
- There is significant variation in data reporting processes across States. The average burden hours for SEAs and LEAs are approximate.
- The Department collected annual performance reports for SY 2022-2023 only and elected not to collect any for SY 2023-24 and 2024-25. Instead, the Department intends to collect a final report with fewer questions. Thus, the average burden hours per response are lower in the final collection due to greater familiarity with

the requirements and fewer questions. The table below reflects estimates for the final report.

**Estimated Annual Burden and Respondent Costs Table**

| Information Activity or IC (with type of respondent) | Sample Size (if applicable) | Respondent Response Rate (if applicable) | Number of Respondents | Number of Responses | Average Burden Hours per Response | Total Annual Burden Hours | Estimated Respondent Average Hourly Wage | Total Annual Costs (hourly wage x total burden hours) |
|------------------------------------------------------|-----------------------------|------------------------------------------|-----------------------|---------------------|-----------------------------------|---------------------------|------------------------------------------|-------------------------------------------------------|
| State Educational Agency – Reporting                 | N/A                         | N/A                                      | 56                    | 56                  | 5                                 | 280                       | \$38.91                                  | \$10,895                                              |
| Local Educational Agency – Reporting                 | N/A                         | N/A                                      | 2995                  | 2995                | 2                                 | 5,990                     | \$38.91                                  | \$233,071                                             |
|                                                      |                             |                                          |                       |                     |                                   |                           |                                          |                                                       |
| Annualized Totals                                    |                             |                                          | 3,051                 | 3,051               | 7                                 | 6,270                     |                                          | \$243,966                                             |

\*Note: The May 2021 mean hourly wage for an SEA Data Program Office personnel is estimated at \$38.91 per hour (SOC code 15-1251, Computer Programmer), Bureau of Labor Statistics (BLS) website, <https://www.bls.gov/oes/current/999201.htm>, accessed May 25, 2022. There is a wide range of hourly salaries associated with the professionals that provide data, making this estimation approximate.

***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 | : 0       |
| Total Annual Costs (O&M)              | : 0 _____ |
| Total Annualized Costs Requested      | : 0       |

There are no record keeping costs for this collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annual cost to the Federal government is \$52,282. The Department estimates the following: four staff members (GS-13), 4 hours x 56 = 896 hours x \$58.35 per hour = \$52,282. The number of hours includes the following tasks: development of Excel files (one for unitary and one for non-unitary systems), outreach to States to review the forms, and collection and tabulation of data collected.

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.**

We estimate that this data collection will result in 6,270 burden hours. This is a reduction of 34,366 hours from the previous estimated burden hours of 40,636. In addition, we estimate that this data collection will result in 3,051 responses from the public. This is a reduction of 7,002 hours from the previous estimated responses of 10,053. The revised request estimates the following burden hours and costs below:

|                                    | <b>Program Change Due to New Statute</b> | <b>Program Change Due to Agency Discretion</b> | <b>Change Due to Adjustment in Agency Estimate</b> |
|------------------------------------|------------------------------------------|------------------------------------------------|----------------------------------------------------|
| <b>Total Burden</b>                |                                          | -34,366                                        |                                                    |
| <b>Total Responses</b>             |                                          | -7,002                                         |                                                    |
| <b>Total Costs (if applicable)</b> |                                          |                                                |                                                    |

- 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 is still determining its publication plan for these data; however, the Department confirms that all data collected from performance reports will be released in a machine-readable format.

- 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.**

Not Applicable.

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

Not Applicable.