

# **Paperwork Reduction Act Submission Supporting Statement**

## ***Rural Education Achievement Program (REAP) Information Collection to Support Grant Funding Process***

**October 30, 2008**

### **Introduction**

This data collection is pursuant to the Secretary's authority under Part B of Title VI of the Elementary and Secondary Education Act (ESEA), to award funds under two grant programs designed to address the unique needs of rural school districts – the Small, Rural School Achievement Program (ESEA Section 6212) and the Rural and Low-Income School Program (ESEA Section 6221).

Under the Small, Rural School Achievement Program, the Secretary awards grants directly to eligible local educational agencies (LEAs) on a formula basis. Under the Rural and Low-Income School Program, eligible school districts are sub-recipients of funds the Department awards to (State educational agencies) SEAs on a formula basis. For both grant programs, the Department awards funds based on a determination of the eligibility of individual school districts and the calculation of the allocation each eligible district should receive according to formula prescribed in the statute.

The Department has devised a two-tier strategy to accomplish the funding process for the REAP program: (1) the Department collects from SEAs the information the Department needs to make eligibility and funding allocation determinations, and (2) LEAs submit applications for grant funding.

This submission requests a three-year extension of the current approved two-tier collection package (OMB #1810-0646). The application and spreadsheet are the same as the previously approved collection. Minor changes in wording have been made to the instructions for Form 1 to improve clarity. There are no other changes except to dates and contacts.

#### A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

Part B of Title VI of the Elementary and Secondary Education Act (ESEA), as

amended by the No Child Left Behind Act (P.L. 107-110), authorizes the Secretary of Education to award funds under two grant programs that are designed to address the unique needs of rural school districts – the Small, Rural School Achievement Program (ESEA Section 6212) and the Rural and Low-Income School Program (ESEA Section 6221).

The Department awards funds for both grant programs based a determination of the eligibility of individual school districts and calculating formula allocations for each eligible district. An extension of this two-tier collection is needed to provide the information necessary for the Department to make the grant awards.

The first tier consists of a data collection from SEAs through the Rural Education Achievement Program (REAP) Spreadsheet and Instructions for SEAs. Through that instrument, the Department is collecting eligibility and allocation data for this program from SEAs.

The other part of this collection addresses the second tier of the Department's strategy for completing the funding process for this program. The second tier consists of an application form for eligible LEAs, and it will collect the minimum amount of information needed by the Department's Grants Administration and Payment System (GAPS) to make grant awards for this program. This form will serve as the application package for LEAs under the REAP Small, Rural Schools Achievement Program (CFDA #84.358A).

Under the Small, Rural School Achievement Program, the Secretary awards grants directly to LEAs on a formula basis. Eligibility for this program is based on rural status and average daily attendance (ADA) for the district by December 1<sup>st</sup> of each year. To be eligible, an LEA must: 1) (a) have a total ADA of less than 600 students, or (b) serve only schools located in counties with a total population density of fewer than 10 persons per square mile; and 2) (a) serve only schools that have an NCES school locale code of 7 or 8, or (b) be located in an area of the State defined as rural by a governmental agency of that State. Allocations are based on the ADA numbers for eligible LEAs and the LEA's previous year's allocations under the following ESEA provisions: 1) subpart 2 of Title II (Teacher and Principal Training and Recruiting); 2) section 2412(a)(2)(A) of Title II (Technology Grants); 3) section 4114 (Safe and Drug Free Schools); and 4) Part A of Title V (Innovative Programs).

The Department collects only information that is essential to making the awards in the SRSA application form. As a result, the SRSA application form is only one page. In addition, the Department has required eligible LEAs to apply once during their initial funding year; the applications are retained and used for each succeeding fiscal year for which the LEA remains eligible for a grant under the SRSA program.

- 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 collected through Form 1, the eligibility spreadsheet, which collects eligibility and allocation data, is used by the program office in coordination with Budget Service to determine school district eligibility for the program and to allocate funds to eligible districts.

The information from Form 2 (the application package) is used to process grant awards under the SRSA 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. Also describe any consideration of using information technology to reduce burden.**

LEAs submit their applications through the Department's electronic submission system. SEAs submit eligibility spreadsheets via email.

For the past three years, the program office has collaborated with the Department's ED Facts staff to align REAP data definitions and elements with ED Facts data collection protocols and in an effort to shift a number of data elements from the REAP spreadsheet to the ED Facts annual data collection, thus decreasing the annual reporting burden that REAP imposes on States. However, at this point in time, the data that REAP requires and the timelines within which those data are needed to make eligibility determinations and allocation decisions are not identical to the ED Facts data element definitions and timelines for data collection. The program office will continue to re-visit these issues and to devise ways to reduce the burden to SEAs.

- 4. Efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.**

The Application Package requests a subset of the information requested in Standard Form 424 (Application for Federal Financial Assistance), which consists of the minimum needed to make grant awards. The only information that is common to Form 424 and the Form 1 (Eligibility Spreadsheet) of this collection is the NCES LEA ID number, which will be used to link allocation and application data to make awards. We would not be able to make this link without the ID number.

- 5. Information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.**

Neither small businesses nor small entities are affected by this collection.

**6. 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.**

Small LEAs are affected by this program. In order to minimize burden for these small entities, the Department proposes an application package that contains minimal request for data- a subset of the information requested in Standard Form 424 and information required by the statute. The Department also intends to make these applications available as electronic applications, which will also minimize burden.

If the information requested is not collected, the Department will be unable to make grant awards, because the formula allocations cannot be calculated without data from SEAs and LEAs.

**7. Special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320. 5.**

This collection is consistent with the paperwork burden regulations of 5 CFR 1320.5.

**8. 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.**

The Department consulted with 9 SEAs and asked them to estimate the burden for these collections at the district level. The burden estimates in this document are based on those responses. The Department has not received comments from SEAs or LEAs on the issue of data collection and burden during the past two years that the collection package has been in use.

**9. Payment or gifts to respondents, other than remuneration of contractors or grantees.**

No payment or gifts will be provided.

**10. Assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulations, or agency policy.**

There is no assurance of confidentiality.

**11. Justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

This collection does not ask questions of a sensitive nature.

**12. Estimates of the hour burden of the collection of information and the annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The total annual reporting and recordkeeping burden for the collection is estimated to be 4,830 hours.

For Form 1 (the REAP Spreadsheet) the maximum number of respondents is 52 SEAs. The average burden per respondent is 40 hours and number of responses per applicant is one per annum. The total estimated burden to SEAs is estimated to be 2,080 hours per annum. In addition, LEAs will review and verify the data entered by the State at an estimated burden of 15 minutes per LEA for 5,000 LEAs. The total LEA burden is approximately 1,250 hours. The total estimated burden hours for Form 1 for SEAs and LEAs combined is 3,330 hours.

For Form 2 (the REAP Small Rural School Achievement Program Application Package, the subject of this clearance), the maximum number of respondents is 4,500. The average burden per response is 20 minutes and total number of responses per applicant is one. The data collection occurs annually. Based on 4,500 responses, which will take an average of 20 minutes per applicant to complete report, the total burden is approximately 1,500 hours.

**Estimate of the total annual cost burden to respondents or record keepers for capital expenses resulting from the collection of information.**

The total annual cost burden to respondents is estimated at \$77,790.

For form 1 (the REAP Spreadsheet previously cleared), primary costs to respondents fall into the following categories: collection of data, filling in information in the spreadsheet, review of data, and e-mailing the form. Based on an estimate of 52 forms prepared and submitted annually, costs to respondents are estimated to be the following:

<u>Collecting data</u>						
52 forms	X	38 hours /form	X	\$25/hour	=	\$ 49,400
<u>Filling in information</u>						
52 forms	X	1.5 hours /form	X	\$10/hour	=	\$ 780
<u>Review of data</u>						
5,000 LEA reviews	X	.25 hours/review	X	\$10/hour	=	\$12,500
<u>E- mailing report</u>						
52 forms	X	.5 hours /form	X	\$10/hour	=	\$ 260
<b>Total cost to respondents</b>						<b>\$62,940</b>

For form 2 (the REAP Small Rural School Achievement Program Application

Package, the subject of this clearance), primary cost to respondents is for filling in the electronic application form. Based on an estimate of 4,500 applications prepared and submitted annually, costs to respondents are estimated to be the following:

$$4,500 \text{ applications} \times .33 \text{ hours /application} \times \$10/\text{hour} = \mathbf{\$ 14,850}$$

**13. Estimate of the total annual cost burden to respondents or record keepers for capital expenses resulting from the collection of information.**

This information collection does not require the use of any capital equipment, start-up costs or record keeping not included in the response to question # 12.

**14. 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.**

For form 1 (the REAP Spreadsheet, previously cleared), program costs entail reviewing completed spreadsheets for completeness; downloading data submitted electronically; calculating allocations; and notifying States of allocations for the State and districts.

Downloading data submitted electronically	.5 hours/form X 52 forms X \$40/hour =	\$1,040
Reviewing completed spreadsheets for completeness:	1.5 hours/form X 52 forms X \$40/hour =	\$ 3,120
Calculating allocations	.5 hours/form X 52 forms X \$40/hour =	\$ 1,040
Notifying States of allocations for the State and districts.	.5 hours/form X 52 forms X \$40/hour =	\$ 1,040
	.5 hours/form X 52 forms X \$12/hour =	\$ 312
<b>TOTAL</b>		<b>\$ 6,552</b>

For form 2 (the REAP Small Rural School Achievement Program Application Package), the subject of this clearance), program costs entail screening applications for eligibility; downloading allocation data into GAPS; making grant awards; and mailing award notifications.

screening applications for eligibility	20 hours X \$40/hour =	\$ 800
downloading allocation data into GAPS	8 hours X \$40/hour =	\$ 320
making grant awards	250 hours X \$40/hour =	\$10,000
mailing award notifications	150 hours X \$12/hour =	\$ 1,800

**TOTAL**

**\$1 2,920**

**15. Reasons for any program changes or adjustments.**

There are no changes in the burden hours.

**16. Plans for tabulation and publication.**

The Department will publish the list of grantees under each program and their allocations. Allocations are based on the formulas required by the statute. No complex analytical techniques will be used.

**17. Reasons not display the expiration date for OMB approval.**

The information collection will display the expiration date for OMB approval.

**18. Exception to the certification statement identified in the “Certification for Paperwork Reduction Act Submissions.”**

There are no exceptions to the certification statement.

**19. Collections of Information Employing Statistical Methods**

This information collection will not employ statistical methods.