

# **U.S. Department of Education**

## Foreign Language Assistance Program for Local Educational Agencies: Grantee Performance Report

### Section A

*Office of Management and Budget  
Clearance Package Supporting Statement  
And Data Collection Instrument*

June 28, 2011

**TABLE OF CONTENTS**

	Introduction.....	1
<b>SECTION A. Justification</b>		
A.1	Circumstances Making the Collection of Information Necessary.....	1
A.2	Purposes and Uses of the Data.....	2
A.3	Use of Technology to Reduce Burden.....	2
A.4	Efforts to Identify Duplication.....	2
A.5	Methods to Minimize Burden on Small Entities.....	2
A.6	Consequences of Not Collecting Data.....	2
A.7	Special Circumstances.....	2
A.8	<i>Federal Register</i> Comments and Persons Consulted Outside the Agency.....	3
A.9	Payments or Gifts.....	3
A.10	Assurances of Confidentiality.....	3
A.11	Justification of Sensitive Questions.....	3
A.12	Estimates of Hour Burden.....	3
A.13	Estimates of Cost Burden to Respondents.....	3
A.14	Estimate of Annual Cost to the Federal Government.....	4
A.15	Program Changes or Adjustments.....	4
A.16	Plans for Tabulation and Publication of Results.....	4
A.17	Approval to Not Display the OMB Expiration Date.....	4
A.18	Explanation of Exceptions.....	4
Appendix A.	<i>Elementary And Secondary Education Act of 1965, as Amended, Title V, Part D, Subpart 9</i>	
Appendix B.	<i>Government Performance Results Act (GPRA) of 1993, Section 4</i>	
Appendix C.	Foreign Language Assistance Program (FLAP) LEA Grantee Performance Report Form	
Appendix D.	LEA Grantee Performance Report B1.xls	

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**INTRODUCTION**

The Foreign Language Assistance Program (FLAP) for Local Educational Agencies (LEAs) provides grants to establish, improve, or expand innovative foreign language programs for elementary and secondary school students. The primary focus of projects funded under FLAP is foreign language learning.

**A. JUSTIFICATION**

**A1. Circumstances Making the Collection of Information Necessary**

Information in the FLAP for LEAs Annual Performance Report (APR) is being collected in compliance with *Elementary and Secondary Education Act of 1965*, as amended, Title V, Part D, Subpart 9, Secs. 5491-5493; 20 U.S.C. 7259 - 7259(b) (shown in appendix A), the *Government Performance Results Act (GPRA) of 1993*, Section 4 (1115) (shown in appendix B), and the Education Department General Administrative Regulations (EDGAR), 34 CFR 75.253. EDGAR states that recipients of multi-year discretionary grants must submit an APR demonstrating that substantial progress has been made towards meeting the approved objectives of the project. In addition, discretionary grantees are required to report on their progress toward meeting the performance measures established for the U.S. Department of Education (ED) grant program.

The overall goal of FLAP is to assist local and state educational agencies in establishing, improving or expanding foreign language study for elementary and secondary school students. There are three GPRA performance objectives for FLAP LEAs and five performance measures associated with the objectives. They are:

*Objective 1: To expand foreign language study in non-critical languages for students served by FLAP.*

**Measure 1.1 of 2:** The number of students participating in foreign language instruction in the non-critical language(s) in the schools funded by FLAP.

**Measure 1.2 of 2:** The average number of minutes per week of foreign language instruction in the non-critical language(s) in the schools funded by FLAP.

*Objective 2: To expand foreign language study in critical languages for students served by FLAP.*

**Measure 2.1 of 2:** The number of students participating in foreign language instruction in the critical language(s) in the schools funded by FLAP.

**Measure 2.2 of 2:** The average number of minutes per week of foreign language instruction in the critical language(s) in the schools funded by FLAP.

*Objective 3: To improve the foreign language proficiency of students served by FLAP.*

**Measure 3.1 of 1:** The number of students in FLAP projects who meet ambitious project objectives for foreign language proficiency. (For grants awarded 2008 onward)

A customized grantee performance report (and accompanying Excel file) that goes beyond the ED 524B APR is requested to facilitate the collection of more standardized and comprehensive data to address the program's GPRA measures, to improve the overall quality of data collected, and to increase the quality of data that can be used to inform policy decisions.

## **A2. Purposes and Uses of the Data**

In 1993, GPRA was passed that requires federally funded agencies to develop and implement an accountability system based on performance measurement. Grantees are required to report on their progress toward meeting the objectives and goals established for each ED grant program.

The purpose of this data collection is to obtain the data necessary for GPRA reporting and project monitoring. FLAP LEA grantees will submit these data semi-annually to the OELA program office. In the first data collection, grantees will provide targets for their performance data and progress towards reaching their targets. In the second collection, grantees report actual performance data. The same form will be used for each data collection.

The program office staff will aggregate and report the actual GPRA performance data to ED's Budget Service. The Budget Service will use this information when making program budget recommendations to Congress. The aggregated actual performance data will also be included in ED's annual Program Performance Report.

The program office staff will also examine each grantee's performance data against project objectives and targets to determine the grantee's progress toward meeting its own goals. Grantees are also to report budget information at both collections, which the program office uses for monitoring purposes. The proposed data collection form will facilitate the collection of more standardized and comprehensive data for project monitoring. For grantees in their final year of funding, the proposed data collection form also serves as their final performance report.

## **A3. Use of Technology to Reduce Burden**

The grantee performance report (and accompanying Excel file) will be available to be completed and submitted electronically.

## **A4. Efforts to Identify Duplication**

There is no duplication of reporting. The information requested for this reporting is not collected or reported elsewhere.

## **A5. Methods to Minimize Burden on Small Entities**

The data collection does not involve small businesses or other small entities.

## **A6. Consequences of Not Collecting Data**

*Annual or periodic performance reporting* is stipulated in GPRA 1993, Section 4. Currently, the FLAP grantees provide information semi-annually on the previously approved grantee performance report (OMB #1885-0554). Semi-annual reporting via the proposed data collection form (and accompanying Excel file) will continue to provide a standardized means for grantees to report on project activities and outcomes as described in their grant proposal and reduce variation in data provided on program outcomes.

## **A7. Special Circumstances**

There are no special circumstances that would require the collection to be conducted in a manner inconsistent with OMB guidelines.

**A8. Federal Register Comments and Persons Consultants Outside the Agency**

We published the 60-day and 30-day *Federal Register* notices.

FLAP project directors were contacted to review the previously OMB-approved grantee performance report, for feedback on the availability of data, frequency of data collection, the clarity of instruction, and recordkeeping. The project directors were:

- Evangeline Jordan, Houston Independent School District
- Jack Hayes, Fayette County Public Schools
- Michael Hibbeln, Rockford Public Schools
- Donna Podgorny, Union County School District

**A9. Payments or Gifts**

There are no payments or gifts to grantees in support of the data collection.

**A10. Assurances of Confidentiality**

There are no assurances of confidentiality to grantees.

**A11. Justification of Sensitive Questions**

There are no questions of a sensitive nature.

**A12. Estimates of Hour Burden**

In 2008, the new collection received OMB approval of 127 total annual respondents with 50 total annual burden hours. What should have been were 127 total annual respondents for a burden estimate of 50 hours per response for 6,350 total annual burden hours. In ROCIS input, an error was made by placing 127 total annual respondents for burden estimate of 0.3149 per response for 50 total annual burden instead of placing 127 total annual respondents for burden estimate of 50 hours per response for 6,350 total annual burden hours.

In 2009, a change request was made (due to forms modifications) that reduced the burden by 10 hours per respondent and reducing the total by 1,270 hours. This reduced the total annual burden hours to 5,080.

In this renewal collection request, we are requesting a reduction in the number of respondents to 114 and increase in the burden per respondent to 41 hours, and a reduction in the annual burden to 4,674. Note: Due to the error in 2008, this request will actually be an increase in the annual burden from 50 to 4,674.

Exhibit A-1 below presents a summary of estimated response burden for the data collection requested in terms of both total estimated hours and total estimated cost.

<b>Data Source</b>	<b>Estimated Number of Respondents</b>	<b>Estimated Burden per Respondent (in Hours)</b>	<b>Estimated Annual Burden (in Hours)</b>	<b>Total Estimated Annual Cost (in Dollars)<sup>1</sup></b>
<b>1<sup>st</sup> data collection</b>				
Grantees	114	21	2,394	\$107,730
<b>2<sup>nd</sup> data collection</b>				
Grantees	114	20	2,280	\$102,600
<b>Total</b>	114	41	4,674	\$210,330

<sup>1</sup>Based on an estimated hourly rate of \$45

Exhibit A-2 below presents a summary of estimated response burden for the data collection previously approved in terms of both total estimated hours and total estimated cost.

<b>Data Source</b>	<b>Estimated Number of Respondents</b>	<b>Estimated Burden per Respondent (in Hours)</b>	<b>Estimated Annual Burden (in Hours)</b>	<b>Total Estimated Annual Cost (in Dollars)<sup>1</sup></b>
<b>1<sup>st</sup> data collection</b>				
Grantees	127	40	5,080	\$228,600
<b>Total</b>	127	40	5,080	\$228,600

<sup>1</sup>Based on an estimated hourly rate of \$45

### **A13. Estimate of Cost Burden to Respondents**

There are no additional costs to respondents or record-keepers resulting from each collection other than that already reported in A12 and A14, including capital or start-up costs, or operation, maintenance, or purchase of services.

### **A14. Estimate of Annual Cost to the Federal Government**

The FLAP program office staff will conduct the data collection for the grantee performance report (and accompanying Excel file). There are currently 114 grantees. It should take one hour of program office staff time to review the submitted report (and accompanying Excel file) for completeness. Given that each hour of program office staff time (including overhead) costs the federal government about \$48 (grade 13, step 5), the annualized federal cost will be approximately \$10,994.

### **A15. Program Changes or Adjustments**

This is a program revision to the previously approved OMB form. Based on grantees feedback, we made modifications to clarify the instructions, however, these changes to the form did not increase overall burden.

We also have an adjustment as we provided a history of the collection in #A12. ED is calculating the burden more accurately. The increase in 4,634 total annual burden is primarily to correct the burden hours to reflect the total annual burden hours rather than estimated hours per response with increase in 1 hour per respondent and decrease in 13 respondents.

### **A16. Plans for Tabulation and Publication of Results**

There are no plans for publication beyond reporting results to ED's Budget Service for compliance with *GPRA*. Should this opportunity arise, the program office will follow OMB recommended steps to ensure information quality. Following this, the program office will engage in peer review by Education Department colleagues as well as experts in the field for any publication of analyses resulting from data collected through the Grantee Performance Report.

### **A17. Approval to Not Display the OMB Expiration Date**

The OMB number and expiration date will be displayed on the data collection form (and accompanying Excel file).

### **A18. Explanation of Exceptions**

There are no exceptions to the certification statement.