

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

U.S. Department of Education Green Ribbon Schools Application Package

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Elementary and Secondary Education Act of 1965 authorizes the Secretary of Education (Secretary) to establish national recognition awards to improve academic achievement and community engagement, such as the existing Blue Ribbon Schools Program and the U.S. Department of Education Green Ribbon Schools, expected to award its first cohort in spring 2012. The authorizing statute is Public Law 107-110 (January 8, 2002), section 501, Innovative Programs and Parental Choice Provisions, which created Part D—Fund for the Improvement of Education, Subpart 1, Sec. 5411(b)(5), of the Elementary and Secondary Education Act of 1965 (20 U.S.C. § 7243(b)(5)).

U.S. Department of Education-Green Ribbon Schools (ED-GRS) is a recognition award that will recognize public and private elementary, middle and high schools that save energy, reduce costs, protect health, foster wellness, feature environmentally sustainable learning spaces, and offer effective environmental education.

In order to select the first cohort of ED-Green Ribbon Schools by the end of the 2012 school year, ED will need to collect data from state education agency nominating authorities regarding their evaluation of top achieving schools in their state. State education authorities will serve as the first line of data collection in the recognition award school selection process. State education authorities nominating schools to ED will be asked to evaluate and select schools based on their energy efficiency, environmental health and environmental education, as well as their compliance with federal civil rights and federal, state and local health, safety and environmental statutory and regulatory requirements.

State agencies were provided a sample application for their adaptation to state needs by a third-party non-profit organization supporting ED's new initiative, which came about after this initial request was submitted. Most states adapted the sample application that the organization aligned to our framework and criteria. That same non-profit has created a mechanism for states to use, adapt and intake the sample application online for their state contests, though they will not be able to submit through an online interface to us. State agencies are selecting whether and how to make use of the third party technical assistance, which is completely optional.

The burden varies greatly from state authority to authority and how they chose to approach the award. The more rigorous development processes are actually indicative of the kind of change we were looking to encourage at the state level with this award.

Environmental Protection Agency (EPA) Administrator Jackson, White House Council on Environmental Quality (CEQ) Chair Sutley, and Secretary Duncan announced the recognition award in April 2011 at a joint ceremony, indicating their shared support for the initiative. The recognition award is part of a larger Administration priority to increase workforce preparedness, and economic and energy security, as well as efficiency, in government and schools.

The Secretary believes that ED-GRS will be effective at achieving this objective, in part because it is the first comprehensive and coordinated federal policy in the three institutional areas of schools related to environment and health. Unlike other environment-related policy mechanisms relating to schools, the award acknowledges and validates the hard work of students, staff, families and communities in reaching high levels of achievement under three areas: 1) environmental impact and energy efficiency; 2) healthy environment; and 3) environmental literacy.

As for efficiency, education authorities must provide documentation that nominated schools comply with federal civil rights and federal, state, tribal and local health, environmental, and safety statutory and regulatory requirements through documentary assessment by state or local health, environmental, or safety authorities. This will ensure proper subject matter expertise, compliance and collaboration at the state level on cross-cutting issues, analogous to the inter-agency effort put forth at the federal level, demonstrated by ED, EPA, CEQ and a host of other federal partners with equities in environmental programs and STEM education. In addition, with regard to school efficiency, national studies of existing green schools programs have linked energy savings to schools' overall cost savings.

So that the Administration can receive state nominations to ED to award a first cohort in spring 2012, ED seeks to provide the Presentation Form for Evaluations of State Nominated Schools – essentially a cover sheet for states' evaluation of their nominees to ED.

Simultaneously with this request for full three-year approval, ED used the ED-GRS blog (<http://www.ed.gov/blog/2011/09/ed-encourages-public-comment-on-plans-for-green-ribbon-schools-award/>) as a public comment forum by posting pertinent documents for public comment.

ED asks for approval of this collection request because the Secretary believes that the recognition award can improve facility cost efficiency, school occupant health and productivity, student engagement in science, technology, engineering and mathematics (STEM) subjects, and critical and innovative thinking skills that are essential to students' workforce preparedness and the nation's ability to compete in

the 21st century economy. The initiative supports the President’s call for an “all hands on deck” approach to raising STEM proficiency and graduates.

The Nominee Presentation Form and Framework provide essential information to states for their evaluation of schools for participation in this recognition award. This participation will support the Administration’s effort to improve education so as to improve the nation’s ability to compete in the technology-driven economy.

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.

ED will request data from nominating authorities that have evaluated schools according to the following categories: 1) environmental impact and energy efficiency; 2) healthy environment; and 3) environmental literacy. This information will be used at the Department to conduct final review to ensure schools meet eligibility requirements, and meet high college- and career-ready academic standards, and then rate the finalists to select the awardees.

A nominating authority is any one of the following:

- a Chief State School Officer (CSSO);
- the Department of Defense Education Activity (DoDEA); and
- the Bureau of Indian Education (BIE)

In the pilot year, two methods will be offered to the nominating authority to collect this data, depending on the authority’s preference and technical capacity:

- Conversion to a pdf form and emailing to the Department; or mailing by expedited mail or a courier mail service.

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.

In the pilot year, ED-GRS will allow email service submission only. ED is considering more sophisticated methods for information collection to reduce the burden on nominating authorities and schools for ED-GRS’ second and future years.

4. Describe 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.

ED-GRS is the first comprehensive and coordinated federal policy in the three institutional roles of schools related to environment, health and education. The award acknowledges the work of schools in reaching high levels of achievement under three areas:

- Environmental impact and energy efficiency;
- Healthy environment; and
- Environmental literacy.

Put another way, ED-GRS looks at:

- schools' and their occupants' impact on the environment;
- schools' environmental and behavioral impact on the students, teachers and others in the facility; and
- how schools teach students about the environment and sustainability to better prepare them for citizenship and employment in the 21st century.

The initiative developed from a 75-entity signatory public request to EPA and ED, as well as from these agencies' interest in a coordinated, coherent federal policy regarding environment, health and education. It is the first of its kind.

Both the non-profit third party and the first states to sign on to the award helped avoid duplication by providing templates of applications, scoring rubrics and press releases to newer states. State education agencies built off the work of each other.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

In a pilot year of a recognition award program, it is difficult to know how many state authorities will evaluate whether to participate and then decide to conduct a selection process in order to nominate schools to ED, and how many schools will apply, particularly those in school districts with a population of less than 50,000. Accordingly, in an effort to minimize burden ED has simplified a range of requirements to be addressed in the applications from among the wide range of potential requirements and provided technical assistance to support the information collection request. These efforts include:

- The nominating authorities will be provided a support framework, on Green Ribbon Schools' webpages, describing possible metrics to gauge the performance of schools in the three categories requested. ED expects that the authorities will use the framework in evaluating schools within their jurisdiction, and that the schools will respond more efficiently as a result of the framework structure.

- ED will also provide a sample application for nominating authorities, should they wish to have model infrastructure on which to base their call for submissions, review and selection of nominees within their jurisdiction.
 - Nominating authorities will be required only to show quantified achievement, not a baseline assessment and show of improvement or nominees' comprehensive green school plans.
 - Nominating authorities are asked to provide only documentary assessment, not on-site verification, by state or local health, environmental, or safety authorities of compliance with federal, state, tribal and local health, environmental, and safety statutory and regulatory requirements; this will avoid a time-and-effort burden on school that would be associated with such on-site verification.
 - ED-GRS will provide technical assistance to schools and states to support the dissemination of best practices and established metrics regarding energy efficient and cost effective, healthy and environmentally sustainable learning spaces and educational programs, including resources, frameworks, analyses and examples.
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 ED cannot collect information regarding the evaluation of schools nominated to ED, it will have no basis for judging or recognizing which schools are Green Ribbon Schools. If the collection is not conducted, the program and first coordinated policy in the three institutional roles of schools become unfeasible.

In order that schools may apply based on their most recent record, ED must collect information for each award cycle, this frequency cannot be reduced. ED expects to make awards each year, so the information collection is expected to occur each year by applicant schools and nominating authorities participating on a voluntary basis.

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 which 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.

Not applicable. There are no special circumstances for this collection. Respondents submit information on a voluntary basis. Respondents are not required to retain records or submit statistical or confidential information or proprietary trade secrets.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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.

Public comment will be sought during the regular OMB clearance process, as well as through the ED-GRS blog page (URL above), where comments will be solicited in response to the posting of these documents.¹

ED received significant public comment on the substance of the award, though not the public burden estimate. It adapted the structure of the award for input received during public comment.

Since the concept launch by the heads of the three core collaborating agencies (ED, CEQ and EPA) behind the initiative on April 26, 2011, the ED-GRS team has consulted with and heard from the major education associations e.g. teachers, principals, school boards; states, e.g. chief state science officers and existing state green schools programs; national NGOs e.g. US Green Building Council, Earth Day Network, National Wildlife Federation, locally-based initiatives; schools and school communities e.g. private, charter, tribal; technical experts e.g. architects and designers, academics, environmental and occupational health specialists; public, e.g. parents, teachers; and other federal agencies, including the Department of the Interior, National Oceanic and Atmospheric Administration, the Department of Defense, the Fish and Wildlife Service, Department of Energy, and US Department of Agriculture, among others.

From the feedback ED has received thus far, interest is high for this new recognition award and the Department expects schools, communities and other stakeholders to urge their state education authorities to develop or refine state green school recognition infrastructures and/or run a concurrent recognition award within their jurisdictions in order to provide nominees to ED.

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

Not applicable. This information collection does not involve payment or gifts of any kind.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Not applicable. Confidential information will not be collected.

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.

¹ Vol. 76, FR 56408

Not applicable. This information collection will not include sensitive and/or private questions.

12. Provide estimates of the hour burden of the collection of information. The statement should :

Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-I.

Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should not be included in Item 14.

Annual Burden Hours

As this is the pilot year of the recognition award, ED provides its best estimate of burden hours. The Department plans to solicit feedback via its blog page (URL above) during the public comment and following pilot year submissions from Nominating Authorities and schools in order to better estimate and address by reducing the burden on Nominating Authorities and schools.

The burden is on two sectors, the Nominating Authorities and schools; the activities they will conduct are described below, the estimated burdens for each provided separately, and the total burden then presented.

The Nominating Authorities will develop their state-specific (or comparable authority-specific, etc.) application and nomination process, solicit applications, review applications, select nominees and submit documentation of evaluation of the nominees, along with a presentation form to ED. The schools will review the state-specific application form, collect information to complete the form, obtain documentary reviews of their regulatory compliance status by state environmental and health officials, and complete and submit documentation to the Nominating Authority. Nearly all states benefited from the sample application provided by a third

party and were not creating their application from the ground up, but rather adapting a template.

ED didn't elect to require a standardized application because during the summer consultation period prior to this submission the community indicated that state education agencies needed some flexibility on their evaluation of nominees to ED. For this reason, so long as state education authorities documented evaluation in all three Pillars and all ten Elements of the award, ED did not mandate state applications look a certain way. States have appreciated the flexibility and, in some cases, adapted their award to local needs, going deeper and broader than what we requested. Furthermore, in the pilot year, there is nothing in our criteria that requires them to run a competition with application process, though nearly all are selecting nominees to ED through a competition that requires some sort of application.

While some states may choose not to participate, the burden estimate below assumes that all will choose to do so. The number of schools that will choose to apply cannot be known in advance. We have estimated high, as it is unlikely in the pilot year of a recognition award that all will participate. ED has also included in its estimate the work of those who will review the application in depth and decide not to apply.

Processing Step	<u>Annual Hour Burden on Nominating Authorities</u>				
	Responses	Hours Per Step	Annual Hours	Cost/Hour	Annual Cost
Develop Nomination Authority-specific application and nomination process	58	80	4,640	\$45.99	\$213,394
Solicit applications	58	20	1,160	\$27.31	\$31,680
Complete sample application	58	25	1,450	\$27.31	\$39,599
Review applications from schools	58,000	0.25	14,500	\$27.31	\$395,995
Select nominees	58	6	348	\$45.99	\$16,005
Submit applications of nominees to ED	58	2	116	\$32.73	\$3,797
Totals	58,058		22,214		\$671,958
Averages			7,404		\$223,986

Processing Step	Responses	Hours Per Step	Annual Hours	Cost/Hour	Annual Cost
Review nomination form	2,000	2	4,000	\$45.99	\$183,960
Collect information to complete the form	1,000	6	6,000	\$32.73	\$196,380
Complete and submit form to	1,000	4	4,000	\$45.99	\$183,960

Nominating Authority			
Totals	4,000	14,000	\$748,260
Averages		4,666	\$249,420

	<u>Annual Total and Average Burden</u>		
Total burden on Nominating Authorities	58,058	22,214	\$660,869
Total burden on schools	4,000	14,000	\$748,260
Total burden	62,058	36,214	\$1,409,129
Average burden	28,686	12,071	\$469,710

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 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.

Total Annualized Capital/Startup Cost : \$.00
 Total Annual Costs (O&M) : \$.00
 Total Annualized Costs Requested : \$.00

See cost burden in item 13 table.

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.

There is no start-up or maintenance cost to this collection of information. At some point in the future ED may create an IT infrastructure to collect the nominating authorities' evaluations of schools in a more efficient manner. However, this is not feasible within the timeframe of the first year.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a new collection, therefore all burden is new. This program change results in an increase in burden and responses of 38,746 hours and 61,108 responses.

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.

For schools selected for the award, excerpts from their summaries of achievements may be shared with other schools, candidates for next year, the press, and the public. The Summary of Achievement in Part II of the collection form (attached) requests a 600-800 word "snapshot" that describes how the school is representative of the state's highest achieving green school efforts.

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. The OMB control number, expiration date, and related information will be displayed on the Nomination Presentation Form.

18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

Not applicable. No exceptions are requested for this submission.

B. Collection of Information Employing Statistical Methods

Not applicable. The information collected will not employ statistical methods for gathering or analysis.