

## TURNAROUND SCHOOL LEADERS PROGRAM

### SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

#### A. JUSTIFICATION

##### **1. Explain the circumstances making the collection of information necessary.**

The Department is using a portion of the fiscal year (FY) 2013 SIG funds allocated by Congress for national activities to fund the Turnaround School Leaders Program. The Turnaround School Leaders Program supports projects that enhance or develop a leadership pipeline that selects, prepares, places, supports and retains school leaders (including leadership teams) in schools that are currently implementing SIG and in SIG-eligible schools. The TSLP competition focuses on:

- Recruiting promising school leaders to apply to participate in the leadership pipeline and implementing a rigorous selection process to select participants;
- Providing high-quality training to participants to prepare them to successfully lead turnaround efforts in SIG schools and SIG-eligible schools;
- Placing school leaders with the locally adopted competencies of effective school leaders in SIG schools and SIG-eligible schools within the LEA or consortium of LEAs;
- Providing ongoing professional development to placed school leaders that focuses on providing targeted assistance on instructional leadership and school management; and,
- Retaining, using financial and other incentives, or replacing school leaders using data collected through the LEA or consortium of LEAs system for determining leader effectiveness.

The purpose of this information collection is to solicit applications from eligible entities for these Turnaround School Leaders Program grants.

The Turnaround School Leaders Program is carried out under the Elementary and Secondary Education Act of 1965 (ESEA), as amended, Title I, Part A, Section 1003(g) (20 U.S.C. 6303(g)); the Consolidated and Further Continuing Appropriations Act, 2013 (Pub. L. 113-6); and the Consolidated Appropriations Act, 2012 (Pub. L. 112-74).

##### **2. Indicate how, by whom, and for what purpose the information is to be used.**

The data provided through this information collection will be used by application reviewers and the Department to assess the extent to which an applicant meets the priorities, requirements, and selection criteria of the Turnaround School Leaders Program competition and determine which applicants should receive grants.

**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 adoption this means of collection. Also describe any consideration of using information technology to reduce burden.**

The information requested under this collection will be collected via electronic submission through Grants.gov, an Internet-based collection system. An electronic document reduces costs of printing and makes the process of data collection more efficient.

**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.**

The Turnaround School Leaders Program application does not duplicate any other information collection effort.

**5. If the collection of information impacts small businesses or other small entities describe any method used to minimize burden.**

Small entities that may apply for the Turnaround School Leaders Program include small local educational agencies (LEAs) and public or private nonprofit or for-profit organization in partnership with an LEA, or with an LEA and a State educational agency (SEA). Applicants will be required to apply electronically, which will help to reduce the burden. Additionally, the Department will monitor the application and review process to identify any areas where burden can be reduced for future competitions.

**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 Turnaround School Leaders Program is a discretionary grant program. The program could not be implemented without the collection of this information from applicants. Not obtaining this data in the application would leave reviewers without the information required to determine if an applicant fulfills the requirements of the grant application.

**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 that can be generalized to the universe of study;
- Requirement the use of the 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 unnecessary 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.

None of the special circumstances listed apply to this data collection.

**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 CFT 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.

This is a discretionary grant and the Department will publish a 30-day Federal Register notice inviting comments. The application was developed with input from various turnaround school leadership experts and practitioners.

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

No payment or gifts to respondents will be made.

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

ED is not requesting any sensitive or confidential information; therefore no assurance of confidentiality is required.

**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. This 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.

**12. Provide estimates of the hour burden of the collection of information.**

ED estimates that each applicant would spend approximately 150 hours of staff time to address the application requirements and criteria, prepare the application, and obtain necessary clearances. The total number of hours for the estimated 100 applicants is 15,000 hours (100 potential applicants multiplied by 150 hours equals 15,000 hours). We estimate the average total cost per hour of the applicant staff who carry out this work to be \$30.00 an hour (based on the GS salary schedule for a

GS11). The total estimated cost for all applicants would be \$450,000 (\$30.00 X 15,000 hours = \$450,000).

**Eligible Applicant Estimate**

<b>Turnaround School Leaders Program Activities</b>	<b>Number of applicants</b>	<b>Hours/Activity</b>	<b>Hours</b>	<b>Cost/Hour</b>	<b>Cost</b>
Complete TSLP application	100	150	15,000	\$30	\$450,000
<b>Total</b>			<b>15,000</b>	<b>\$30</b>	<b>\$450,000</b>

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There are no startup costs for this information 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 Federal costs will involve screening the applications, managing the grant review, reviewing the budgets, and awarding Turnaround School Leaders Program grants.

<b>Program Staff</b>	
1 GS15 x \$56 x 50 hours	\$2,800
2 GS12 x \$34/hour x 250 hours	\$17,000
2 GS9 x \$24/hour x 150 hours	\$7,200
<b>Total Federal Personnel Costs</b>	<b>\$27,000</b>
<b>Contract Costs</b>	
Firm Fixed Price Logistics Contract	\$78,000
<b>Grand Total</b>	<b>\$105,000</b>

The cost to the Federal government is approximately \$105,000 annually pre- and post- competition efforts.

It is estimated that one full-time GS-15 oversees the competition efforts and represents ED in pre- and post-competition public and governmental meetings, and responds to public questions and concerns. Two full-time GS-12 staff members are the competition managers and are responsible for the day-to-day competition work. Two GS-9 employees review and prepare task specific competition documents. A total of 850 hours is spent on this effort. The total personnel cost for 850 hours of staff time equates to \$27,000.

Contractor costs for the FY 13 competition are set by a firm fixed price logistics contract. The contractor will assist with the application review. The value of the grant review is expected to be approximately \$78,000. The calculation includes the review costs associated with the RTT-ELC competition. The total includes costs for contractual support, conference calls, printing, and mailing expenses, computer and printer rental, reviewer expenses (printing, honoraria, etc.).

The total estimated Federal personnel and contract costs are \$105,000.

**15. Explain the reasons for any program changes or adjustments.**

This request is for a new information collection, there is a program change increase of 15,000 total annual burden 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.**

Some of the information collected in this grant application may be analyzed with performance data and shared on a government website such as Ed.gov.

**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.**

All data collection instruments will include the OMB expiration date.

**18. Explain each exception to the certification statement identified in the "Certification for paperwork Reduction Act Submissions" Form.**

ED is not requesting any exception to the certification statement.