

**Student Support Services Program
Request for Approval under the Paperwork Reduction Act and 5 CFR 1320
Supporting Statement for the Annual Performance Report Form**

A. Justification

1. The Department of Education (Department) is requesting approval for a revised collection that is currently active. The SSS annual performance report will expire on January 1, 2008 (OMB No.: 1840-0525) for the SSS Program. The SSS Program provides Federal financial assistance in the form of discretionary grants to institutions of higher education for the purpose of providing academic and other support services to low-income, first-generation or disabled college students. These support services are intended to increase students' retention and graduation rates, facilitate their transfer from two-year to four-year colleges, and foster an institutional climate supportive of the success of low-income and first generation college students and individuals with disabilities.

The SSS Program is authorized by Title IV, Part A, Subpart 2, Chapter 1, Section 402A(c)(2) of the Higher Education Act of 1965, as amended; and is governed by the Program regulations in 34 CFR 646.22; and EDGAR Parts 34 CFR 74.51,75.720, and 75.732

The data provided in the annual performance report is compared with the grantee's approved project objectives to determine the grantee's accomplishments and used as a tool for awarding prior experience points. During a competition for new awards, the prior experience points are added to the average of the field readers' scores to derive a total score for an application. A slate of all applicants is developed on the basis of the total scores of the applications. Funding recommendations and decisions are primarily based on the rank order of applicants on the slate. Therefore, the assessment of prior experience points is a crucial part of the overall application process.

In addition, during non-competitive years, the reports are used to verify that grantees are making substantial progress towards the achievement of approved objectives prior to issuing the non-competing continuation awards.

Further, this annual performance report form collects quantifiable data needed to respond to the requirements of the Government Performance and Results Act of 1993 (GPRA). In the Department's Annual Performance Plan, the overall objective for the Federal TRIO Programs is to: "to increase the percentage of low-income, first

generation college students who successfully pursue postsecondary education opportunities.”

The collection will also assist OMB with the Performance Assessment Rating Tool (PART) used to improve program effectiveness and to ensure public accountability.

2. In addition, the annual performance reports are used to collect programmatic data for purposes of annual reporting; budget submissions to OMB; Congressional hearing testimonials; Congressional inquiries; performance measuring; and responding to inquiries from higher education interest groups and the general public.
3. The data being requested allows the grantees to use computerized data systems to collect, retrieve, and report the requested information. A web-based software application has been developed for grantees to enter the data online and submit the entire report via the Internet. The SSS projects have been submitting the annual performance report via the Internet for six years. For project year 2000-2001, 88% of the projects submitted via the Internet; for 2001-2002, 96% submitted via the Internet, for 2002-2003, 99.67% submitted via the Internet, for 2003-2004, 99 % submitted via the Internet and for 2004-2005, 99.5% submitted via the Internet. Our goal for the 2005-2006 data collection is to have all projects submit the annual performance report data via the Internet.

The data collected is summary information on project participants and services, and poses a low-level security risk. Nonetheless, the web site is secured to ensure the data are only seen by authorized individuals and are protected from network hackers.

4. Since the information submitted in this report is unique to each respondent, no duplication exists as far as can be determined. There is no other collection instrument available to collect the information that is being requested.
5. This information collection does not involve small businesses or other small entities.
6. The collection of performance reporting is required annually. The information provided in these reports is needed to award prior experience points to grantees. Without this data collection, the Federal TRIO Programs will be unable to use the data to assess the prior experience provision of the authorizing statute, or respond to the GPRA, PART, efficiency measures requirements, and develop improved policies for program administration.
7. With one exception, no information will be collected in the manner covered under any of the special circumstances outlined. The exception is that respondents are required to retain participant records for more than three years. In order to assess the impact of the program services on participating students’ academic progress,

grantees are required to track the academic progress of all prior-year participants as long as they remain enrolled at the grantee institution.

8. The Department's Regulatory Information Management Group will solicit public comments on this information collection in the Federal Register pursuant to 5 CFR 1320.8(d), after submitting the collection to OMB. A summary of any comments received will be shared with OMB.

Program staff continue to attend a number of state, regional, and national meetings and solicit informal views and comments on the reporting requirements from grantees and other interested persons. In addition, the SSS Program grantees frequently send staff suggestions and recommendations regarding the annual performance report form; some of which are reflected in this collection. For this information collection, Department sent materials about proposed revisions in the performance report to leaders of the Council for Opportunity in Education (CEO); Department staff engaged in a 90-minute conference call with a group of eight to nine SSS project directors and an official of COE and obtained feedback on proposed revisions in the performance report form. Consideration was given to all recommendations and suggestions received from the working group. In addition, staff apprised a larger group of SSS project directors of the changes during the April 12, 2006 COE conference. Grantees were encouraged to comment during the announced public comment periods.

We received comments from 58 commenters on the proposed changes to the APR. Individuals submitted 56 of these; one was submitted by the national umbrella organization for the Federal TRIO Programs and one by one of the regional associations. The majority of the commenters supported the proposed changes and offered suggestions for further clarification. However, because of the concerns raised regarding our proposal that grantees provide specific information on the services/activities provided each participant, including contact hours, we decided to delete all fields from Section III pertaining to services/activities.

9. The Department will not provide payment or gifts to respondents.
10. The Department's disclosure policies adhere to the provisions of the Privacy Act.
11. The annual performance report form does not include questions about sexual behavior and attitudes, religious beliefs, or other items that are commonly considered sensitive and private.
12. The estimated burden hours for this collection of information are 6 hours. We estimate approximately 960 respondents x 1(one) annual performance report each. Annual Performance Reports will be submitted once a year (annually).

Estimated number of respondents	960
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Estimated preparation time	6 hours
Total estimated burden hours	5,760

Most of the costs of this data collection are those of the Federal Government, since the respondents are project staff paid for the most part with Federal grant funds. Nonetheless, the annual cost to the grantee to respond to this data collection is estimated as follows:

Estimated annual costs to respondents:

Professionals (960 personnel X 5.5 hours @ \$30 per hour)	\$158,400
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Clerical (960 clerical X 0.5 hours @ \$16 per hour)	\$ 7,680
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Total estimated cost to respondents	<u>\$166,080</u>
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13. There are no other costs to the respondents. Grantees are required by the program regulations to collect and maintain this information. The costs to electronically transmit the data via the World Wide Web are within customary and usual business practices.

14. Estimated annual costs to the Federal Government:

The largest portion of the Government’s cost is borne directly by the Department of Education in designing the report form, securing clearance of the form, and in collecting, aggregating and disseminating the information.

14 . Estimated annual costs to the Federal Government:	SSS
Professional staff to update report form and prepare clearance package (GS 14 employee) \$50 per hour X 80 hours	\$4,000.00
Overhead costs related to facilities, Administration and other indirect costs, plus accrual of leave and fringe benefits, estimated at 50% of salary \$4,000 X 50 percent	\$2,000.00
Clerical staff to type, route, and copy report form \$16 per hour X 10 hours Overhead costs: \$160 X 50 percent	\$160.00 \$ 80.00
Other Department staff to review and approve the request (GS 15 employee) \$55 per hour X 20 hours=\$1,100.00 (GS 14 employee) \$50 per hour X 30 hours=\$1,500.00 (GS 14 employee) \$50 per hour X 30 hours=\$1,500.00 (GS 13 employee) \$45 per hour X 30 hours=\$1,350.00 total salary \$5,450	\$5,450.00
Overhead costs related to facilities, Administration and other indirect costs, plus accrual of leave and fringe benefits, estimated at 50% of salary costs: \$5,450 X 50 percent	\$2,725.00
OMB review (estimated)	
\$42 per hour X 8 hours Overhead Costs: \$336 X 50 percent	\$336.00 \$168.00
Other Administrative Costs	
Posting annual performance report to World Wide Web (2 hours X 1 staff @ \$35 per hour)	\$70.00
Annual updates to web application, web-site hosting, help desk And data processing (contractor costs)	\$150,000.00
Analyses of data and preparation of national summary and individual project reports (contractor costs)	\$175,000.00
Professional staff to review and edit reports for dissemination \$50 per hour X 40 hours	\$2,000.00
Overhead Costs: \$2,000 X 50 percent	\$1,000.00
Total Annual Government Cost	\$342,989.00

15. A difference of 4 rows from the previous collection exists because section II and III of the current performance report was removed. The aggregated data that was collected in these sections has been eliminated

16. Results of the collected information will be analyzed to determine if each grantee is meeting its approved goals and objectives.

The national profile reports of aggregated data include the following types of information: (1) demographic profiles of project participants; (2) profiles project services and activities; and (3) project outcomes (i.e. postsecondary persistence and graduation). The purpose for these reports is to share national information on the SSS Program projects with project staff and, as appropriate, members of the Congress and the larger education community. The reports provide descriptive outcome information that currently funded SSS Program projects can use for a variety of purposes, including developing plans to address the requirements of the GPRA.

The data may also be used to supplement other data collection efforts sponsored by the Department, including an ongoing national evaluation study of the SSS Program conducted by the Department's Planning and Evaluation Service.

16. This report form and the web site will display the expiration date for the OMB approval of the information collection.

18. There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

The collection of information does not employ statistical methods.