

TO: Rachel F. Potter  
Office of Information and Regulatory Affairs  
Office of Management and Budget

FROM: Marie Buker  
GEAR UP Program

DATE: January 6, 2007

SUBJECT: Response to OMB Comments on Revised Gear Up APR (1840-0777)

I have included your questions with responses following each for ease in reviewing.

1. All of the burden increase has been attributed to a program change and none to an adjustment. However the ROCIS submission states that "The change in burden is due to an increase in the number of Gear Up grantees, from 316 in FY 2003, to 328 in FY 2006 and the fact that it is now submitted electronically. The number of hours per grantee to complete the Annual Performance Report was reduced by one hour as the electronic version totals all federal and non-federal budget information." This would argue for a burden decrease due to the electronic submission (program change) and an increase due to more applicants (adjustment).

The burden rate per grantee was reduced one hour for pre-populated budget information as well as the automatic totaling: this includes federal and non-federal budgets, ethnicity total, participation by gender, total of students served - new and continuing by grade level, totals for tables on student enrollment in advanced courses, course completions, and educational progress.

The program change resulting from a one hour decrease in completion time per APR from 35 to 34 hours is outweighed by the increased number of grantees completing the APR. The number of grantees increasing from 316 to 328 . This results in a final program adjustment of 92 hours.

2. The burden estimate of 34 hours assumes that grantees have maintained computerized service records for students enrolled in the program. How many grantees maintain the information in this format? Also, what is the OMB number for the recordkeeping requirement for this program?

The GEAR UP program does not have a recordkeeping requirement. We do believe that almost all of our grantees keep electronic records for their own purposes. They keep this information for reporting to the local education agency and the state education agency.

3. Please explain how you determined the burden estimate of 34 hours for the new electronic system.

Feedback from grantees on the electronic APR have been very positive, indicating an average reduction of 2 hours in completion time on the APR bringing it down from 35 hours to 33 hours. (This is based on the form that expired 12/31/06). With the additional information in the proposed APR, included in the response to question 4 (below), one hour has been added back into the completion time bringing it up to 34 hours.

4. Has ED added any new questions to this APR that were not included in the previous version of this form?

Yes, we did add:

- Section III, # 11 - the partner table, (response to this question completed only once),
- Section 5, # 2 – in the course completion table, pre-calculus, biology and international baccalaureate courses were added,
- Section V, # 3 – in Educational Progress by Current GEAR UP Students, number of students taking the PSAT was added,
- Section V, # 4 – Baseline High School Graduation and College Enrollment - data is to be completed when the first cohort is in 11<sup>th</sup> grade. (Response to this question completed only once.)

5. In Section III, question 3 asks for information about expenditures and matching contributions in previous budget periods. Don't you already have this information from previous budget years? If this system is electronic, why can't you pre-populate these fields? This question also applies to question 11 on partners.

In section III, # 3 expenditures and matching contributions are carried over and pre-populate the fields, but edit capability is there to allow for revisions due to late invoicing or late documentation from partners relating to a previous year.

The partner table is new, but once it is completed, the table will be pre-populated but can be updated to show additional partners or change in status of existing partners.

6. In Section IV, 1B, do the grantees have data separated by race/ ethnicity? Does it make sense to break Hispanic/ Latino into a separate reporting category, so that

grantees don't have to choose how to report someone who is black and Hispanic (for example)?

In Section IV, 1B, according to OMB guidance at the time this form was last approved, the categories you now see were the ones we were instructed to use. The ethnicity data as currently defined is now being used in long-term evaluations and consistency in reporting is important to this evaluation.

7. Is the burden for administering parent/ student surveys included in the 34 hour burden estimate? If not, it should be added as a separate burden estimate.

Yes, administration of parent and student surveys is included in the 34 hour burden estimate.