Supporting Statement for Paperwork Reduction Act Submissions

Application for Annual Performance Report for Titles III & V Grantees

A. Justification

1.) Under Titles III & V of the Higher Education Act of 1965 (HEA), as amended, discretionary grants are awarded to eligible institutions of higher education and organizations (MSEIP-Title III, E only) to support improvements in educational quality, institutional management and fiscal stability. The office of Institutional Development and Undergraduate Education Services (IDUES) awards one-year planning grants, five-year individual development grants and five-year cooperative arrangement development grants to institutions with low per-student expenditures that enroll large percentages of minority and financially disadvantaged students.

The communities served by Titles III and V of the HEA include: Historically Black Colleges and Universities (HBCUs); Historically Black Graduate Institutions (HBGIs); Hispanic-Serving Institutions (HSIs); American Indian Tribally Controlled Colleges and Universities (TCCUs); Alaskan Native and Native Hawaiian-Serving Institutions (ANNH); and other institutions that serve a significant number of minority and financially disadvantaged students and have low educational and general expenditures per student.

The driving force for these changes to the Annual Performance Report (APR) is the Government Accountability Office (GAO). The Government Accountability Office's audit, GAO-03-900 "Distance Education: More Data Could Improve Education's Ability to Track Technology at Minority Serving Institutions," found that, "the Department of Education can further refine its programs for monitoring technology usage at minority serving institutions." The GAO recommends that, "the Secretary of Education direct managers of the Title III and Title V programs to further improve their annual performance report for Historically Black Colleges and Universities and Tribal Colleges by including areas such as student access to computers and the number of distance education courses that can be offered."

For the past five years, IDUES has focused on collecting relevant grantee performance data based on allowable activities for distance education authorized by Title III and Title V of the Higher Education Act of 1965, as amended. In response to GAO's recommendation, IDUES will amend the APR for HBCUs and TCCUs to include distance education data elements currently collected for the Strengthening Institutions Program (SIP) and Developing Hispanic-Serving Institutions Program by adding a new section (Section 5). This section will meet GAO's recommendation for improvement, provide more complete program information, and improve our ability to measure impact consistently across programs that serve minority institutions. These technology-related data elements, which are currently covered by Section 3 of the APR for the SIP and Developing Hispanic-Serving Institutions Program, are included in the TCCU and HBCU sections of the performance report form as follows:

Creating or improving facilities for Internet or other distance learning academic instruction capabilities, including purchase or rental of telecommunications technology equipment or services.

Was student access to the Internet increased?
   If yes: Start # of students _____   End # of students _____
      Application objective _____

Was faculty access to the Internet increased?
   If yes: Start # of faculty _____   End # of faculty _____
      Application objective _____

Was the number of computers available to students outside of the classroom increased?
   If yes: Start # of computers _____   End # of computers _____
      Application objective _____

Was the number of computers available to faculty outside of the classroom increased?
   If yes: Start # of computers _____   End # of computers _____
      Application objective _____

Did the number of faculty trained in technology increase?
   If yes: Start # of faculty _____   End # of faculty _____
      Application objective _____

Did the number of students taking courses using technology increase?
   If yes: Start # of students _____   End # of students _____
      Application objective _____

Did the number of courses using technology increase?
   If yes: Start # of courses _____   End # of courses _____
      Application objective _____

Were distance-learning facilities established?
   No standardized data elements

Did the number of students using the distance-learning facilities increase?
   If yes: Start # of students _____   End # of students _____
      Application objective _____

Did the number of faculty trained in teaching distance-learning courses increase?

   If yes: Start # of faculty _____   End # of faculty _____
      Application objective _____

Did the number of faculty teaching distance-learning courses increase?
   If yes: Start # of faculty _____   End # of faculty _____
      Application objective _____

Did the number of distance-learning courses under development increase?
   If yes: Start # of courses _____   End # of courses _____
      Application objective _____

Did the number of distance-learning courses increase?
   If yes: Start # of courses _____   End # of courses _____
      Application objective _____

Did the number of students taking distance-learning courses increase?
   If yes: Start # of students _____   End # of students _____
      Application objective _____

Other: _____
   If yes: Start _____   End _____   Application objective _____

Other: _____
   If yes: Start _____   End _____   Application objective _____

Authorization for the collection of information is consistent with
Education Department General Administrative Regulations (EDGAR) parts 74.51,
75.118, 75.253, 75.590, and 75.591.

2.) The information gathered by the APR has been used to: (1) monitor the yearly
   progress of Title III and V grantees; (2) assist in the decision making process in
   regard to making non-competing continuation awards to grantees for the following
   year; (3) collect management performance and GPRA data to report to
   policymakers; (4) meet Office Of Management and Budget (OMB) program
   assessment reviews; and (5) meet corrective actions outlined in previous audits by
   the Office of Inspector General (OIG). Project directors compile the information for
   the report and submit it to the Department of Education via a secure web-based
   report. Once received, the Title III and V program office and other applicable entities
   at the Department of Education (OIG, Policy, Planning, and Innovation (PPI), Budget
   Service, etc.) analyze resulting APR reports. The results of the reports have played
   and will continue to play a central role in approving continuation funding.

   Grantees must have demonstrated that they have made substantial progress
   towards meeting the goals of their project objectives in order to receive continuation
   awards. The APR records the accomplishments or progress of a project, provides

grantees with an opportunity to articulate why grant objectives were or were not met, and documents their planned and actual federal expenditures. The APR provides a brief narrative section that allows grantees to communicate important information that is harder to capture in the quantitative sections of the report, such as unexpected outcomes from their Title III or Title V projects.

The APR is structured to provide varying levels of analyses, the most expansive of which is the collection of performance measurement data. The most detailed and individualistic level of analysis focuses on the specific grant activities identified in the grantee's original application. As the grantees provide responses to the status of their activities, the configuration of the APR allows for broader inquiry by grouping activities into categories that are identified in the legislation governing Titles III and V. The flexible structure of the APR is further conducive to a program-wide analysis and allows us to measure the targeting of Federal resources, the effectiveness of program outcomes, and, subsequently, the success of the programs as a whole. Profile and Trend Reports for each authorized program are developed as a result of data from the APR as well. This level of analysis is central to IDUES' ability to meet OIG and OMB reporting requirements.

3.) The APR is a web-based report maintained by Caliber, ICF, IDUES consultant on the technical development of the report. Our grantees overwhelmingly favor a web-based report for ease of completion, general convenience, and efficiency. The respondents upload data, save and return to the report before submitting it to IDUES, print out the report at any time, and benefit from the latest in web security.

The advantages of a web-based APR for IDUES are significant. For the clarity of completing the report, a web-based version displays only the relevant portions of the APR to the grantee, based on the program in which the grantee is participating and the type of institution the grantee represents. Given that the APR is intended to serve multiple programs and diverse institutions, if the report is viewed in its entirety, there are an overwhelming number of options. **Based on the information that a grantee provides when they log in to the system (creating a profile), only the pertinent sections of the report are selected and displayed to the grantee.** For example, a 2-Year Institution does not see questions about enrollment at 4-Year Institutions, making the report easier to understand and complete.

The web-based APR further employs technology in data management. Once the reports are complete, in order to make use of the data, the responses need to be entered into a database. The web-based format enables us to automatically download the responses (as a Comma Separated File) into a database, making the analysis accessible and manageable.

We initially expected a 95% completion rate from grantees for completing the APR via the Internet. The web-based report has yielded a completion rate in excess of 99% for grantees. The APR is accessible by all personal computers with Internet access and is supported by any standard Internet browser.

To ensure a successful transition from the paper to web-based report, training was provided in key locations throughout the country for program staff and grantees. A technical assistance phone number and customer service/help desk are available while grantees are completing the APR.

To view a web-based version of the APR, please go to www.calib.com/education . The website is used extensively as a training site for IDUES staff and grantees. Use the following information to access the training site:
PR Award #   - 125pr
Unit ID #   - 125u
Password   - 125pw

4.) There is no duplication of data caused by this change. Duplications found in the report deal solely with the Institutional Profile (Section Two) data collection in the APR. As noted in the instructions, the tables correspond to surveys from the Integrated Postsecondary Education Data System (IPEDS), which is administered by the National Center for Education Statistics (NCES), located within the U.S. Department of Education. IPEDS is a comprehensive system of surveys designed to collect institution-level data in such areas as enrollments, program completions, faculty, staff, and finances. More than 9,000 postsecondary institutions complete the IPEDS surveys every year.

The Institutional Profile data that the APR is collecting is essential because it lends relevant context to the report. It is important to make clear the operating conditions of the institutions we serve, especially since so many of them focus on disadvantaged students and underrepresented groups, so-called "at risk" students. Also, this institutional context helps gauge how our programs have institution-wide outcomes. IPEDS offers a meaningful institutional context by providing data regarding student body characteristics, enrollment, and graduation / completion rates.   Rather than create our own method for collecting this data, we resolved it to be less burdensome for the grantee to align our report with the IPEDS survey.

Furthermore, when most grantees log into the APR, the majority of the Institutional Profile section will already be populated with data. IDUES has been working closely with NCES to ensure that this duplication of data will have a minimal burden on institutions. IDUES and NCES have signed a Memorandum of Understanding stating that, when possible, data will be shared between the two groups, so that IDUES can upload the IPEDS data directly into the APR. The grantee will not have to enter in this data, as it will have been pre-loaded into their report. During our consultation with the grantee community, they asked that we display the data on their institution for their review, a request that we will honor.

The exceptions to the aforementioned process will occur when (1) an institution does not report any data to IPEDS; or (2) a branch campus reports data to IPEDS as an aggregated part of a multi-campus system. Our consultation with the grantee community informed us that when a branch campus (which may receive its own Title III or V grant) is part of a multi-campus system that reports to IPEDS as a single

entity, the branch campus data frequently exists in their institutional records. In this case, we will ask the branch campus to disaggregate their IPEDS data and report directly in the APR only their particular branch campus data.

When an institution does not report to IPEDS, the NCES policy is to impute the data based on a number of variables. To maintain regularity, if an institution does not provide the requested information, we will follow NCES policy and use the imputations supplied by NCES. The following year, both the IPEDS surveys and the APR will again provide the institution with another opportunity to provide first-hand data.

In the rare circumstance where an institution or branch campus is unable to provide any IPEDS data (and it cannot be imputed), we will provide a narrative that may be used to explain how providing this data for the purposes of the APR would be far too burdensome or expensive for the institution to absorb. If the institution provides a satisfactory justification, it will be excused from completing the Institutional Profile section; this circumstance has not occurred since inception of the Performance Management System.

Based on the scope of institutions participating in the IPEDS survey and our consultation with the grantee community, we believe that providing the data for this section will be of little burden to the majority of institutions. In regard to the aforementioned exceptions, we will be able to identify those schools in advance and work closely with them to ensure that their participation will not be an excessive burden.

5.) The collection of information will not have a significant impact on small businesses or entities.

6.) Without this change to the APR, IDUES will not be able to comply with GAO's recommendation and our efforts to track the progress and improvements in technology made by minority institutions will be greatly hindered. The addition of a new section will allow us to gain a deeper understanding of our programs with a minimal increase in burden to our grantees.

7.) There are no special circumstances as outlined in #7 of the Supporting Statement Instructions.

8.) There were no public comments to FR Doc 05-2080 Federal Register: February 2005 (Volume 70, Number 22).

9.) No payment or gifts are provided to respondents.

10.) The confidentiality assured to respondents is within the Department of Education's standard policy and is described under the Privacy Act of 1974 (5 U.S.C. § 552A), as amended, and EDGAR Parts 75.740 and 99. If required, additional assurances are provided for Section Two of the APR (Institutional Profile), which collects data

regarding graduation and completion rates (Tables 3-13). Again, the bulk of this data is provided by the NCES and imported into our APR. We follow the NCES standards protecting the confidentiality of individuals, when the disclosure of such information would constitute a clearly unwarranted invasion of personal privacy. This assurance is in accordance with NCES policy as described in Title V, Section 501 (a) of the Education Amendments of 1974 (Public Law 93-380). This title amends Part A of the General Education Provisions Act by adding Section 406 (d) (2) which specifically grants NCES the authority to develop and enforce standards used to protect the confidentiality of individuals.

11.) There are no questions of a sensitive nature in the APR.

12.) Prior to the submission of the FY 2005 package to renew the APR, nine (9) grantees voluntarily reviewed and completed the APR as a "pilot test." In addition to providing valuable insights and recommendations, the grantees were able to supply a reliable burden estimate based on their experiences. The hour burden on respondents is expected to vary by program as the APR is structured around the number of activities that a grantee is undertaking. Typically, projects funded by Title III and V range in the number of activities offered which causes variation in the burden on respondents. The Title III and Title V programs, authorized by the Higher Education Act of 1965 as amended are; 1) Strengthening Institutions Program, Title III, Part A; 2) Tribally Controlled Colleges and Universities, authorized by Title III, Part A, Section 316; 3) Alaska Native and Native Hawaiian-Serving Institutions Program; 4) Historically Black Colleges and Universities Program, Title III, Part B; 5) Historically Black Graduate Institutions, Title III, Part B, Section 326; 6) Minority Science and Engineering Improvement Program, Title III Part E; and 7) Developing Hispanic-Serving Institutions Program, Title V. An additional 150 burden hours are expected from 150 grantees responding to the new Section V, crafted to comply with the GAO audit. Each of the Title III/V programs has been identified in the following table:

	Title III-A	Title III-A Sec. 316	Title III-A Sec. 317	Title III-B	Title III-B Sec. 326	Title III-E	Title V	Total
# of Respondents	267	51	23	99	18	112	192	762
Frequency of Response	Annually	Annually	Annually	Annually	Annually	Annually	Annually	Annually
Annual Hour Burden Per Respondent	20	21	20	25	26	15	20	20 (Average)
Annual Hour Burden Total	5,340	1,071	460	2,475	468	1,680	3,840	15,334

Estimated Cost to Respondents*	$117,480	$23,562	$10,120	$54,450	$10,296	$36,960	$84,480	$337,348

Estimate based on total burden hours x $22.00 estimated hourly wage

- Number of respondents: 762
- Frequency of response: **Once per year for 762**
- Annual hour burden: **Between 15-26 hours per respondent, 20 hours for average response; 15,334 hours total**

- Estimated annualized cost to respondents: **$337,348**
  (Estimate was based on total burden hours X $22.00 estimated hourly wage)

13.) Estimated Total Cost Burden to Respondents:

The new Section V of the annual report requires 150 grantees to respond; each grantee is expected to complete the new section in one hour. The only cost to respondents is that shown in item 12 above. Other expenses reported by consulting grantees fall within customary and usual business practices and are negligible. $337,348.00 is the expected burden.

14.) Estimated Annualized Cost to Federal Government:

Expenses	PY	CY	BY
Consulting Contract: Web/Database Development and Maintenance	$150,000	$150,000	$150,000
Department of Education Staff: 1,524 Hours X $39.31 (BY) and $38.30 (PY) (Hourly rate of a GS-13, Step 2)	$58,369	$59,908	$59,908
Additional Overhead for Support	$500	$500	$500
Totals	$208,869	$210,408	$210,408

15.) The overall burden hours are expected to increase slightly to 15,334. The increase in burden hours from 12,700 is due to this programmatic reporting change and adjustment to past year estimates. 150 hours of burden are attributable to TCCU and HBCU grantees completing the new programmatic requirement and 2,484 new burden hours are attributable to an increase in the number of grantees completing the report.

16.) There are no immediate plans to publish the results of this change in a formal manner. Program trend reports have been drafted based on the entire collection; publication is pending.

17.) There is no request to omit the OMB expiration date.

18.) There are no exceptions to statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.