

## Supporting Statement

### Performance Report for the Robert C. Robert C. Byrd Honors Scholarship Program (ED Form E40-33P)

#### A. JUSTIFICATION

1. The Robert C. Byrd Honors Scholarship Program is authorized under Title IV, Part A, Subpart 6 of the Higher Education Act of 1965, as amended (20 U.S.C. 1070d-31 through 1070d-41) and administered under 34CFR, Part 654.

Under the Robert C. Byrd Honors Scholarship Program, the Department of Education issues grants for states to provide scholarships for postsecondary study to outstanding high school graduates who show promise of continued excellence. The program regulations allow the Department to require any reports deemed necessary to make certain that the functions of the Robert C. Byrd Honors Scholarship Program are carried out. The information collected in the Performance Report ensures that State Education Agencies (SEA) are making scholarships available in accordance with the legislation and regulations that govern the Robert C. Byrd Honors Scholarship Program. The previously approved Performance Report expires on June 30, 2007.

Further, this Performance Report form lends itself to the collection of quantifiable data needed to respond to the requirements of the Government Performance and Results Act (GPRA).

2. Each of the participating SEAs provides information on the Annual Performance Report (APR) about the state's use of program funds in order to demonstrate compliance with the program's statutory and regulatory requirements. The program staff uses the Performance Report data for monitoring program funds distribution and for program evaluation and policy recommendations.

SEAs are held accountable for evidence that scholarship recipients meet all statutory and regulatory requirements. The designated SEA is accountable to the Federal government for the adequate documentation of student eligibility. State maintained fiscal and program records must demonstrate that funds go only to qualified recipients, in appropriate amounts, and in accordance with all the applicable statutes and regulations.

The Performance Report is the only vehicle used by Federal program officials to annually monitor and evaluate the compliance of SEAs. Without this data collection, the Federal program officials would have no means by which to monitor, evaluate, and ensure compliance with the program statute and regulations.

3. SEAs are encouraged to use computer technology when feasible and cost effective. The SEAs use of electronic media for the retention of records for the Robert C. Byrd Honors Scholarship Program is approved under the provisions of EDGAR, Section 80.42.
4. A single designated agency in each state is responsible for the administration of the Robert C. Byrd Honors Scholarship Program. Each SEA annually provides state specific data on its Performance Report that is not collected on any other form. Therefore, there is no duplication of reported information.

Similar information for each state is not available from other sources. There are no other applicable report forms available for carrying out these functions.

5. The collection of information in this program does not impact any small entities. SEAs and ministries of education are the only grant recipients of the Robert C. Byrd Honors Scholarship Program. This form requests the information needed to evaluate the performance of the grantees, only. All of the information requested should be collected routinely by a grantee in the normal administration and evaluation of grant activities. Thus, the reporting burden is minimal.
6. Information collection and recordkeeping must be kept on a yearly basis, at a minimum, in order to be accurate. Any lapse in the keeping of required information makes it impossible to determine accountability for use of Federal funds in compliance with statute and regulations.
7. This report form is inconsistent with the general information collection guidelines specified in 5 CFR 1320.6. The record retention period required for this program is 5 years, not the 3 years required under 5 CFR 1320.6. The 5-year record retention period is required by 34 CFR 80.42 (b)(4) which implements the 5-year record retention requirement under 20 U.S.C. 1232f (Section 437 of the General Education Provisions Act (GEPA)). (See attached copies of 34 CFR 80.42 (b)(4) and Section 437 of GEPA).
8. When the program was established, a committee of State Agency Officials representing the National Association of State Scholarship and Grant Programs (NASSGP) and other SEA officials were invited to provide the Department with comments and suggestions concerning this information collection. The invitation to make comments was reviewed in the original report. Since that time, members of NASSGP have been extended an invitation to comment on each information collection extension. We will publish 60-day and 30-day Federal Register Notices to allow public comment.
9. No related costs for this state.

10. There is no assurance of confidentiality to state educational agencies.
11. There are no questions of a sensitive nature.
12. There are a total of 57 respondents to this annual information collection. The burden estimated for this information collection is 10.0 hours per respondent. The 114-hour increase in the hour burden is due to the mandatory collection of data addressing the program's performance indicators, namely, percentage of Byrd Scholars graduating within 4 years, as well as, percentage of beginner Byrd Scholars remaining in school at the end of the school year. Previously, collections and reporting of data on graduation rates were optional and the request for data on persistence rates was nonexistent.

Therefore the total annual burden is calculated as follows:

$$10.0 \text{ hours} \times 57 \text{ respondents} = 570 \text{ hours}$$

The hourly estimate includes identifying and collecting the relevant information, formatting and preparing the report response, securing appropriate signatures, and maintaining records.

The total annual cost burden to respondents is:

Professional Staff (10 hours x \$25.00/hr)-----	\$250.00
Support Staff (4 hours x \$15.00/hr)-----	\$ 60.00
Estimated annual total cost for computer usage-----	\$ 70.00
Estimated annual cost per respondent-----	\$380.00

13. No start-up cost required for this information collection.

14. Federal Government Costs:

The annual cost of the Federal government for the processing of this Performance Report is estimated to be \$16,300.00. This cost includes staff time in: (1) preparing, printing, and mailing the reports; (2) processing the reports submitted by the states; (3) recording and analyzing the data for funding decisions to ensure state compliance with the program statute and regulations; and (4) preparation and posting of the Performance Report on the Institutional Development and Undergraduate Education Program Service WebPages.

The annual costs of the Federal government are calculated, as follows:

Professional Staff (300 hrs x \$40.00/hr) -----	\$12,000.00
Support Staff (200 hrs x \$12.00/hr) -----	\$ 2,400.00
Computer time, Miscellaneous (Printing of document & mailing)	\$ 1,000.00
World Wide Web preparation and posting -----	\$ 900.00
(One Professional Staff x 30 hrs x \$30.00/hr)	_____

Total estimated cost of the Federal Government ----- \$16,300.00

15. There is an adjustment of 114-hours since this collection form has been modified. The 114-hours increase in the hour burden is due to the mandatory collection of data addressing the program's performance indicators. Previously, collection and reporting of these data were optional or non-existent.

Therefore, the total annual burden is calculated as follows:

$$10.0 \text{ hours} \times 57 \text{ respondents} = 570 \text{ hours}$$

The hourly estimate includes identifying and collecting the relevant information, formatting and preparing the report response, securing appropriate signatures, and maintaining records.

16. Results are not intended for statistical use or publication.
17. The expiration date for OMB approval of the information collection will be displayed on the form.
18. There are none.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection of information does not employ statistical methods.