OMB Forms Justification Package

Learn and Serve America Program and Performance Reporting System (LASSIE)

PART A: JUSTIFICATION

A1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Learn and Serve America Program was established by the National and Community Service Trust Act of 1993 (PL 103-82) to support efforts in schools, higher education institutions and community-based organizations to involve young people in meaningful service to their communities while improving academic, civic, social and career-related skills. The Learn and Serve program is administered by the Corporation for National Service (CNCS or 'the Corporation'), which distributes approximately $37 million in grants annually to states, national organizations, and institutions of higher education for three broad streams of programs:

- school-based service-learning programs, which support school and school district efforts to promote service-learning among school-aged youth;
- community-based programs, which support efforts to involve youth in service through community-based organizations; and
- higher education grants, which support efforts to involve students in colleges and universities in service-learning.

Under the legislation authorizing the Learn and Serve America Program (42 U.S.C. 12639) and the Government Performance and Results Act of 1993 (P.L.103-62; GPRA), the Corporation is required to regularly evaluate its programs and to report to Congress annually on progress towards meeting its goals. As part of this effort, in 2002, the Corporation launched a major initiative to strengthen the accountability and performance of programs funded under the national service laws. As a result of that initiative, the Corporation implemented the Learn and Serve American Program and Performance Reporting System. In addition, Learn and Serve successfully completed the Program Assessment Rating Tool (PART) in 2007. The reporting system was central to providing data for the PART and will continue to collect data to report on measures identified through the PART review.

The purpose of this data collection request is to seek the renewal of the Learn and Serve America Program and Performance Reporting System, also known as LASSIE. As outlined in greater detail below, the primary data collection tool for the new system is an annual *Program and Performance Measurement Report* that is completed once per year by any institution that receives Learn and Serve America grant funds. The Report is administered through an on-line, web-based system (http://www.lsareports.org) that includes a number of reporting management tools that are designed to enhance the accuracy of program reporting and minimize the reporting burden. The system also includes reporting features that allow organizations that report through the Learn and Serve system to access their data, as well as the data of any organization to which they provide subgrants. In addition, the system provides a public use data set for each program year.

The Program and Performance Measurement Report collects information on the characteristics of the reporting institutions, numbers and types of program participants and program partners, service activities, and institutional supports for service-learning. There are three parallel versions of the Report to accommodate differences in terminology and institutional structure among K-12, higher education, and community-based grant recipients. The data generated by the system is used by the Corporation for program management and improvement as well as for reports to Congress.

Program and Performance Measurement Report

The Program and Performance Measurement Report is the primary data collection instrument for the reporting system. The Report is divided into two major parts: a program registration section that is designed to provide a basic listing of the institutions receiving Learn and Serve America funds, and the main Program Reporting Form.

Program Registration Information

The Learn and Serve America program employs a decentralized grantmaking process in which grants are made from the Corporation to direct grantees (generally state education agencies, state commissions, colleges and universities, and national nonprofit organizations) who in turn make subgrants (and, in some cases, these subgrants make sub-subgrants) to local schools, school districts, colleges, and nonprofits to operate service-learning programs. A list of Learn and Serve grantees and subgrantees, including contact information, is acquired from the Corporation's eGrants system. This list is manually downloaded to the program reporting system in February of each year and is used to provide access to grantees and their subgrantees by assigning User IDs and passwords. These user ids and passwords are sent to all grantees and subgrantees via email.

Through the Program Registration section, also referred to as the "grant profile," respondents are asked to verify, and if necessary update, their contact information (contact name, e-mail, address, telephone, etc.), and add contact information for any additional users within their organization. Respondents are asked to provide some basic organizational information, including their organization type, which is used to determine which of the three survey versions that they will receive (K12, higher education, or community-based organization). They also indicate whether they provide subgrants to other institutions or organizations, use Learn and Serve funds to provide training and technical assistance or curriculum development, and/or directly operate Learn and Serve-funded service-learning activities. If the respondent provided subgrants during the relevant program year, they must provide contact information for each institution or organization to which they granted Learn and Serve funds (in the case of Learn and Serve grantees, they are required to update the list of their subgrantees initially provided through eGrants). Those subgrantees and subgrantees reported through the system are automatically sent an email notifying them of the reporting requirement.

If a respondent reports that their institution or organization directly operates Learn and Serve funded service-learning activities, they are required to complete the Program Reporting Form. If a respondent is a subgrantee, but does not directly operate service-learning activities (i.e. they subgrant the funds and/or provide training and technical assistance), they are required to complete only those questions on the Program Reporting Form related to institutional characteristics and training and technical assistance activities.

Program Reporting Form

The Program Reporting Form is designed to collect information on program-related outputs and outcomes from institutions that are operating service-learning programs using Learn and Serve America funds. The Program Reporting Form collects five types of information: characteristics of institutions receiving Learn and Serve funding; characteristics of the Learn and Serve programs and activities; institutional supports for service-learning; training and technical assistance activities and needs; and project descriptions.

The data from the Program and Performance Measurement Report will enable the Corporation to address a number of key program performance and management questions, including questions about the scope and extent of Learn and Serve-funded program activities; key program outputs; and the extent of progress towards institutionalization of service-learning in grantee institutions.

Data Collection Process

The Program and Performance Measurement System reports are designed to be completed by all institutions receiving Learn and Serve America funds, including grantees, subgrantees, and sub-subgrantees. The data collection process is described in detail in Section B3 of this submission.

A2. Indicate how, by whom, and for what purposes the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The data collected through the Program and Performance Reporting System is intended to be used by the Corporation for several major purposes. The first is to meet its obligations to report on the operations of the Learn and Serve America program and the program's progress towards meeting its goals. In that regard, the data from the system is used by the Corporation in reporting on the operation and outcomes of the Learn and Serve America program in its annual *Performance and Accountability Report* to Congress, its annual *Congressional Budget Justification*, and the review of the program through the PART. Data reported through these reports include the numbers of funded programs, numbers of program participants and volunteers, types of service-projects and numbers of service hours, numbers of community partners recruited, the extent of institutionalization of service-learning, and measures of program quality. In addition, data collected through the system has been used to fulfill data requests from the Administration and Congress on the types of activities operated using Learn and Serve funds.

The second major use of the data is to inform the Corporation's efforts to continually improve the effectiveness of its programs. The data from these reports, along with evaluation data generated by other Corporation-funded studies, has been used in assessing the degree to which Corporation policies are promoting growth and expansion of service opportunities and in examining such policy-related questions as the relationship between grant size and program growth, institutionalization among the different types of grantee organizations, the relationship between specific institutional supports (such as the presence of a coordinator, or the integration of service-learning into professional development) and the extent to which staff and students at an institution are involved in service-learning.

The Corporation provides individual-level data to each institution and to their grantors, as well as aggregate-level data for all users of the system (grantees, subgrantees, etc.) both through an on-line reporting function and through publication of an annual report. For grantees, the data (particularly the on-line data) may be used in documenting the performance of their subgrantees and to support their own reporting to the Corporation. Data may also be used at both the grantee and subgrantee level to place local programs in a state or national context (for example, comparing local outcomes with those of all programs in the state or nation) as part of their own reporting and/or program improvement efforts.

Finally, a public use data set is also made available on the website. The public use data set provides individual-level responses for every survey respondent, without any organizational- or grant-identifying information.

The Learn and Serve America Program and Performance Reporting has provided the Corporation and Learn and Serve America with an unprecedented-level of detailed information on the flow of Learn and Serve funds and the scope of service-learning activities that are supported by the program. First implemented to collect data during the 2003-2004 program year, the system has been refined to improve the user-friendliness of the system and ease respondent burden. During the 2004-2005 and 2005-2006 program years, the survey had over 90 percent response rates. The implementation of the web-based reporting system and reporting management tools has also improved the reliability of data collected.

The data collection activity has been carried out by the evaluation and program staff at the Corporation in conjunction with a reporting system team from two external research organizations and one media technology company. The prime contractor is Abt Associates, based in Cambridge, Massachusetts, which is currently under a task order contract with the Corporation and has been the prime contractor since the system was initially implemented in 2004. Abt Associates is being assisted on this project by the Center for Youth and Communities at Brandeis University in Waltham, Massachusetts and RelyOn Media LLC in Shelburne Falls, MA. Together, the three organizations bring extensive experience in the design and operation of data collection systems with Learn and Serve grantees and programs. They have designated experienced professional staff for the oversight and implementation of the system to ensure that the data collection system is implemented in a consistent manner with high regard for standards of accuracy, reliability, and validity.

A3. Describe whether and to what extent the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of

responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The primary data collection mechanism for the LSA Program and Performance Reporting System is a web-based, online data collection system. The web-based system, which is located at **http://www.lsareports.org**, is designed to provide several key features aimed at promoting compliance and accuracy of reporting. These include: (a) an online registration process that will provide a database of grantee and subgrantee organizations; (b) an online reporting management process that will allow grantee and subgrantee organizations to review submissions and prompt nonresponders on a regular basis; (c) the capacity to automatically review program and performance reports for missing or out-of-range responses; and (d) a data reporting function that will allow real-time reporting of aggregate results for use by all the organizations participating in the reporting system (the Corporation, grantees, and subgrantees). In addition, grantees and subgrantees are able to enter and update information throughout the program reporting period, which simplifies the data collection and reporting process. As such, the web-based system provides for a substantial increase in quality control and responsiveness for the system.

The system is also designed to maximize ease of use and minimize the reporting burden for grant recipients. Key elements in this approach include the ability to download copies of the Program Reporting Form items to facilitate data collection and the capacity to add and update information in the system on an ongoing basis. The system also includes an on-line tutorial, quick start guide, on-line instructions and 'pop-up' definitions to assist with completion of the survey. The system also includes worksheets to simplify respondents' data collection tasks. A help desk is also available to users; users can contact the help desk by phone or email and receive a response within one working day.

User comments about the usability and utility of the site have been incorporated into the current design.

A4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purpose described in item 2 above.

This reporting system represents the only national collection of data on Learn and Serve America programs. Contact information for Learn and Serve grantees and subgrantees is currently collected through the Corporation's eGrants system; this information will be downloaded into the Program and Performance Reporting System to avoid duplication of information collection.

While some individual CNCS grantees collect data from their Learn and Serve subgrantees as part of their program reporting, there are no other sources of consistent national data on the Learn and Serve program. Given the reporting and management tools provided through this system, however, we have found that this duplication has been reduced as grantees have made use of the data collected through the national system to fulfill their own data needs. We continue to work with grantees to eliminate duplication whenever possible.

A5. If the collection of information impacts small businesses or other small entities, describe any methods to minimize burden.

The reporting system does not impact small businesses or other small entities.

A6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacle to reducing burden.

The Program and Performance Reporting system is the primary source of program and outcome data for the national Learn and Serve America program. No other source of information is available to permit the Corporation to respond to its measures determined under the PART, GPRA-related requirements or to the general requirement to evaluate its programs under its authorizing legislation (i.e., 42 U.S.C. 12639). Because the Corporation is required to report on Learn and Serve program activities and outcomes on an annual basis, this basic program reporting data needs to be gathered every year.

A7. Explain any special circumstances that would cause an information collection to be conducted in a manner that (a) required respondents to report information to the agency more often than quarterly; (b) requires respondents to prepare written response to a collection of information in fewer than 30 days after receipt of it; (c) requires respondents to submit more than an original and two copies of any document; (d) requires respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax record for more than three years; (e) 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; (f) requires the use of a statistical data classification that has not been reviewed and approved by OMB; (g) 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 unnecessarily impedes sharing of data with other agencies for compatible confidential use; or (h) requires respondents to submit proprietary trade secret, 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.

There are no special circumstances that will require information to be collected in a manner that is not consistent with the requirements outlined above.

A8. 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 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to the notice and describe actions taken by the agency in response to the 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 instructions and recordkeeping, 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 three years even in 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.

The initial 60-day Federal Register notice was published on May 2, 2007 and ended July 2, 2007 (Volume 72, no. 84, pages 24278-24279). A copy is attached.

Two individuals provided written comments to the Corporation in response to this Federal Register Notice. One of the comments requested further clarification for the survey questions gathering data on participant race and ethnicity. The second comment came from a subgrantee that provided training and technical assistance; the commenter requested that the Corporation consider ways for subgrantees that do not directly run service-learning activities to report on their activities. The Corporation has modified the survey instruments to address these comments.

As part of the review process, the Corporation and the contractors working on this project set up two conference calls for those from whom information is obtained and those with extensive knowledge on service-learning programs. The first call, which focused on K12 schools and community-based organizations, was attended by five participants: two K12 grantees, one K12 subgrantee, one CBO subgrantee, and one service-learning researcher. The second conference call, which focused on higher education institutions, was attended by three participants: one from a higher education institution and two from organizations that foster service-learning at the post-secondary level.

Public comments regarding the survey questions and administration called for two types of changes to the survey: additional response options and additional directions. Users felt that some of the response options to questions did not adequately capture the unique nature of their programs or populations served. The Corporation has addressed this issue by adding response options to several of the questions to capture a broader range of program designs and populations served. Second, users felt that some questions needed additional directions or definitions in order to provide an accurate response. The Corporation has added additional directions and definitions to improve the clarity of these questions and reduce confusion.

Public comments were sought regarding the burden estimate of the survey. All individuals offering comments during the federal register period felt that the burden estimate for grantees (.25 hours) and subgrantees (.5 hours to 2 hours with an average of 1 hour) was accurate and reasonable.

The final versions of the forms being submitted reflect the input we received.

A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There will be no payments or gifts to respondents.

A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The data collected through the Program and Performance Reporting System is used by the Corporation for program improvement and management, and grantees use data collected on their subgrantees for program improvement and management. Organizational information for those organizations that receive Learn and Serve funds is provided through the Service-Learning Clearinghouse. However, all survey data provided to the public lacks any institutional, individual, or grant-identifiable information.

A11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other behaviors that are commonly considered private.

The proposed data collection contains no questions of a sensitive nature.

A12. Provide estimates of the hour burden of the collection of information. The statement should: (a) indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of expected hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. (b) if this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in line 13 of OMB Form 83-1. (c) provide estimates of annualized costs to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in item 14.

The total hour burden for the Program and Performance Reporting Form is estimated at 2025 hours, based on an average of .25 hours for grantees and 1 hour for subgrantees for approximately 2100 respondents to gather information and complete the form. The time needed to complete the form can vary from approximately 15 minutes for an organization that primarily subgrants all of its funds to approximately 2 hours for sites operating multiple programs and who need to aggregate data from those programs.

These estimates were initially based on pilot tests of the forms with a small number of subgrantees and reviews of the forms by the project's network of advisors; subsequent usage of the system verifies this response time. The response time includes time for brief review of project files as well as the time needed to complete the survey itself. The cost estimate ($32 per hour) is based on the 2006 hourly wage data for college and public school faculty and staff (who typically will be completing these forms) from the Bureau of Labor Statistics' National Compensation Survey. The following table summarizes the number of respondents for the Program and Performance Report and the Learn and Serve Customer Satisfaction Survey and associated burden estimates and annualized costs to respondents.

Form	Respondents	Estimated Number of Respondents	Estimated Burden per Respondent (Hours)	Total Burden Estimate (hours)	Annualized Cost Estimate (@$32 per hour)
Program and Performance Management Report	Grantees (state education agencies, higher education consortia, national nonprofits) and subgrantees (schools and school districts, individual higher education institutions, local or regional community-based organizations).	100 grantees and 2000 subgrantees	.25 hours for grantees, and .5 hours to 2 hours, with an average of 1 hour, for subgrantees	25 hours for grantees and 2000 hours for subgrantees	$64,800
TOTAL		2100		2025	$64,800

A13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. Do not include the cost of any hour burdens shown in Items 12 and 14.

No additional data gathering or recordkeeping is required of respondents for this information collection activity.

A14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annual cost to the Federal government for the implementation of the Program and Performance Reporting System is estimated at $150,000, which includes costs associated with modification and maintenance of the on-line system and the collection, analysis, and reporting of data collected. The estimate is based on the cost for implementing the system for the previous three years.

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

There is an adjustment to Item 13 of OMB Form 83-I due to an overestimation of burden with the initial clearance package, where there was an overestimation of the number of total respondents. The number of respondents has been adjusted based on the number of average number of respondents over the past three years.

There is no adjustment to Item 14 of OMB Form 83-I.

A16. 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.

Analyses of the data include basic descriptive analyses aimed at addressing questions related to the overall growth and performance of the Learn and Serve program, and analyses aimed at identifying effective practices and institutional supports within the Learn and Serve community. Analyses break out the results by institutional and grant type to identify differences between K-12 schools, school districts, higher education institutions, and community-based organizations.

The primary analysis consists of basic frequencies and crosstabulations to examine differences between different types of programs and/or the relationship between particular program characteristics; however, in some cases more sophisticated analyses including measures of association, multivariate analyses, and factor analysis may be used to examine the relationships between program or institutional characteristics and program outcomes. As part of the on-line reporting function, users of the system, including grantees, subgrantees, and public users have access to on-line reports with basic data provided; they also have the ability to download the data in order to develop their own crosstabulations and breakdowns so that they can identify patterns that will best serve their reporting needs.

The data from the Program and Performance Measurement System are reported on an annual basis through several mechanisms, including *The Annual Performance Report* and the Corporation's *Performance and Accountability Report*. In addition to these formal reports, the Contractors and the Corporation conduct more focused analyses to answer specific policy and programmatic questions (i.e., those related to effective strategies) on an as-needed basis. While the major purpose of those reports is to inform internal Corporation decision-making, versions of those analyses may be disseminated to grantees and others (for example, as background papers) as part of a broader set of policy discussions. In those instances, the papers will include a discussion of the data sources and the analysis methods in a technical appendix to the papers.

Project Schedule

The schedule for the project is as follows:

Project Subtasks	Schedule
Revise and modify instrumentation, web-based data collection technology and obtain OMB forms clearance	Spring-Summer 2007
OMB approval	Fall 2007
Conduct FY 2008 Program and Performance Report data collection	February 1, 2008-July 15, 2008

Clean and analyze FY2008 data	August 2008
Prepare Annual Performance Report	September 2008
Create data files for CNCS for further research	Ongoing
Conduct FY 2009Program and Performance Report data collection	February 1, 2009-July 15, 2009
Clean and analyze FY2009 data	August 2009
Prepare Annual Performance Report	September 2009
Conduct FY 2010 Program and Performance Report data collection	February 1, 2010-Julyl 15, 2010
Clean and analyze FY2010 data	August 2010
Prepare Annual Performance Report	September 2010

A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The expiration date will be displayed as required on the web-based and downloadable versions of the forms.

A18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB Form 83-1.

There are no exceptions to the certification statement in Item 19.