**Talent Search and Educational Opportunity Centers Programs**
**Request for Approval under the Paperwork Reduction Act and 5 CFR 1320**
**Supporting Statement for the TS and EOC Annual Performance Report Form**

## A. Justification

1. The Department of Education (ED) is requesting reinstatement of the previously approved performance report form that expired on November 30, 2006 (OMB No. 1840-0561), with revisions, to collect data under the Talent Search and Educational Opportunity Centers (EOC) programs. No one has used the expired document since November 30.

The Talent Search and EOC programs are two of the eight Federal TRIO programs that provide federal financial assistance in the form of discretionary grants to institutions of higher education and education agencies to increase participation and completion rates of low-income and first-generation college students in the academic pipeline. The specific goal of the Talent Search and EOC programs is to help youth and adults from disadvantaged backgrounds complete secondary education and enroll in programs of postsecondary education (20 U.S.C. 1070a).

The information that grantees submit in the performance report allows TRIO to assess annually each grantee's progress in meeting the project's approved goals and objectives. The performance report data are compared with the project's approved objectives to determine the project's accomplishments, to make decisions regarding whether funding should be continued, and to award "prior experience" points. The regulations for these programs provide for awarding up to 15 points for prior experience (34 CR 643.22 for TS; 644.22 for EOC). During a competition for new grant awards, the prior experience points are added to the average of the field reader scores to arrive at a total score for each application. Funding recommendations and decisions are primarily based on the rank order of applications on the slate; therefore, assessment of prior experience points, based on data in the annual performance report, is a crucial part of the overall application process.

Further, this performance report form is the main source of data for the Department's response for these two programs to the requirements of the Government Performance and Results Act (GPRA). In the Department's FY 2008 Annual Program Performance Plan, the program goal for the Federal TRIO programs is to "Increase the percentage of low-income, first-generation college students who successfully pursue postsecondary education opportunities."

In this revision, the Department has updated the form to reflect the new standard objectives required of all projects beginning new grant periods in 2006–07; these standards were included in the application packages for the programs that OMB approved in 2005. The Department believes that use of the new objectives will result in more accurate and uniform reporting of data.

The Department collects information from Talent Search and EOC grantees under the authority of Title IV, Part A, Subpart 2, Chapter 1, Section 402B and F of the Higher Education Act of 1965, as amended, the program regulations in 34 CFR 643 and 644, and the Education Department General Administrative Regulations (EDGAR), in 34 CFR 74.51, 75.720, and 75.732. Copies of the authorizing statute and the programs' regulations are attached.

2. The Department uses the data collected to (a) evaluate projects' accomplishments, (b) determine the number of prior experience points to be awarded to current grantees, and (c) aid in compliance monitoring (e.g., to determine whether grantees are in compliance with the selection requirements for project participants [34 CFR 643.3 and 644.3]).

In addition, TRIO uses the annual performance reports to produce program-level data for annual reporting, budget submissions to OMB, Congressional hearings and inquiries, and responding to inquiries from higher education interest groups and the general public. Without this data collection, the Federal TRIO programs would be unable to comply with the prior experience component of the law and to respond to GPRA requirements.

With performance report data submitted in fall 2005, TRIO staff members calculated the prior experience points each grantee had earned--a critical element in determining which applicants received grant awards for periods beginning fall 2006. In fall 2006, ED relied exclusively on performance report data to determine, for GPRA purposes, percentages of EOC and Talent Search participants who had enrolled in postsecondary education.

3. Since 1999, Talent Search and EOC grantees have used collected data in computerized data systems and have submitted that data via a Web-based software application that allows them to enter data online and submit the report via the Web. While 56 percent of grantees submitted reports electronically in 1999, now all grantees do so.

The data collected are summary information, not data on individual participants; thus the reports are a low-level security risk. Nonetheless, the Web site is secured to ensure that the data are seen only by authorized individuals and are protected from network hackers. Further, online data edits are in place to ensure the accuracy and integrity of the data submitted.

4. Since the information grantees submit in their performance reports is unique to each project, no duplication exists. No other instrument is available to collect the information that the program needs to assess prior experience or program outcomes. The data collected in the annual performance reports are fundamental to these programs.

5. This information collection does not affect small businesses or other small entities.

6.  As indicated above, if the information were not collected, the Department would be unable to assess grantees' performance, to follow regulations governing award of new grants, and to report on each program as a whole. As grantees' and programs' performance must be assessed annually, so must the reports be submitted each year.

7.  This information collection will not be conducted in a manner cited in item #7 of the instructions for the Supporting Statement (revised 1/97).

8.  Consistent with the requirements of 5 CFR 1320.8(d), the Department of Education solicits comments on this information collection through *Federal Register* notices.   The first notice requesting public comments on the data collection was published on April 16, 2007; the second notice instructing the public to submit comments on the data collection to the Office of Management and Budget (OMB) was published in the *Federal Register* on _________.  A summary of comments appears below in this section.

Since this information collection was last approved, TRIO staff members have attended a number of state, regional, and national meetings at which the Department solicited informal views and comments on reporting requirements from grantees and other interested persons.  Most recently TRIO staff attended the September 2006 annual convention of the Council for Opportunity in Education, a large organization representing most of the TRIO grantees, and a training session for TRIO grantees held in March 2007; at both meetings staff heard about certain issues important to grantees and have made some revisions in earlier drafts of this revision of the annual performance report form.

During the first public comment period (ending June 15, 2007), the Department received 46 formal comments, almost all via e-mail.  An analysis of the comments and of changes in the proposed annual performance report follows, with issues grouped by subject.  Suggestions for minor changes (generally those of a technical nature) and suggestions that are incompatible with statutory authority and/or regulations are not discussed below. However, some clarifications and technical changes have been made to the revised instructions to address the concerns raised.

*Necessity of collecting various kinds of information*

Many individuals thought that a number of items in the annual performance report were not needed for the purposes cited in section 1 of this statement--to allow the Department to assess projects' success in meeting their objectives, to decide whether grants have made substantial progress and thus should receive continued funding within a performance period, to award prior experience points, and to aggregate data from all projects so as to report on the programs' success in reaching goals under GPRA. The individuals who commented on this issue thought that the Department had thus imposed a burden that projects collect data peripheral to the programs' main purposes.  For example, some commentators thought that grantees should not be required to report data on participants excluded from the standard objectives (in 16 April 2007 version, Talent Search, section IV.G; EOC, section IV.F–J) or on the eventuality of a participant's withdrawal from postsecondary education (in 16 April 2007 version, TS, section IV.E; EOC, section IV.D). Some individuals thought that projects should not have to distinguish between participants who had enrolled in postsecondary education for the first time and those who had reenrolled.

Discussion: The Department agrees with most of these comments. In requesting some of the information mentioned by commentators, the Department's intent in part had been to anticipate questions often asked by grantees about the proper place to count participants who do not obviously fit into basic categories (for example, does a student who the project knows enrolled in postsecondary education and then withdrew belong in the "Enrolled in postsecondary education" category?); we agree that this purpose is outweighed by the need to confine the reporting burden to information essential for GPRA and prior experience calculations. **Action taken by ED:** The Department has revised the draft form and instructions to simplify them and to limit the information reported to that needed for purposes cited in section 1 of this statement. Specifically, the Department has:

--consolidated categories (e.g., in Talent Search section III.A, two non "college-ready" categories are now simply "other participants not older than 18 years"; in Talent Search section IV.A, four categories are now referred to as "Not promoted");

--eliminated specific mention of participants who had enrolled in postsecondary education and subsequently withdrew (these participants will simply be counted as having enrolled);

--removed, for all grantees using the new standard objectives, the requirement for grantees to distinguish between first-time enrollments and those who had dropped out of postsecondary education and now want to reenter; and

--eliminated categories designed to collect end-of-budget-period information on participants not included in the standard objectives.

In the interest of consistency with the objectives, as suggested by a commentator the form and instructions now use the term "budget period" rather than "reporting period."

*Burden hours*

A number of individuals wrote that completing the annual performance report would take significantly longer than the six hours. Discussion: As indicated directly above, the Department has revised the draft form and instructions to simplify them and to limit the information reported to data needed for purposes cited in section 1 of this statement. Grantees are required under the programs' regulations to collect the data that are to be entered on the form; the reporting burden, therefore, is that of entering the data on the form, not of originally collecting it. The Department considers six hours realistic for the action of entering already collected data into the form. **Action taken by ED:** None.

*The standard objectives included in the application packages for the programs that OMB approved in 2005*

Some comments raised objections to aspects of the new standard objectives or suggested changes in the objectives (for example, a suggestion was made that a Talent Search participant's limited English proficiency should be sufficient evidence to exclude him or her from "college-ready" status). In addition, several commentators wanted additional information on the definition of "enrollment," "continuing education," or "alternative education" as included in the objectives.

Discussion: The Department points out that the standard objectives were previously published for comment in the *Federal Register* and were used in the 2006 competition; review of the annual performance report is therefore not the forum in which to consider alteration of the objectives. On the other hand, the Department agrees that further clarification of some terms in the objectives would be constructive. **Action taken by ED:** In the revised instructions for the annual performance report, the Department has provided additional discussion of the terms raised.

*Calculating extent to which EOC projects met the standard objectives*

The annual performance report indicated which categories in section III for EOC ("Educational status of participants at beginning of budget period") would constitute the denominator for the objectives. One individual suggested that, for the objectives on EOC participants' applying for student financial aid and postsecondary admissions and on postsecondary enrollment, the denominator should include adults 19 or older who are in continuing education at a level equivalent to a high school senior. Another commentator thought that secondary school dropouts should be added to the denominator for the EOC objective on enrollment in a continuing education program.

Discussion: The Department concurs with these comments. In the first case, the participants suggested for inclusion for these objectives are comparable to the high school seniors currently included in the group relevant to EOC objectives b–d. In the second case, secondary school dropouts are comparable to the current members of the group relevant to the first EOC objective who have neither a diploma nor an equivalency degree. **Action taken by ED:** The notes in the form itself and the instructions to the form now reflect these changes. To accommodate the first suggestion, the Department has added another line to EOC section III.A of the report form.

*Chronological points for determining whether a participant met an objective*

The form as it appeared in the first public comment period contains major sections on educational status of participants at the beginning and end of the budget period (sections III and IV, respectively). The instructions require that, in section III, participants be placed in the category in which they belonged at the beginning of the budget period or, for new participants served after the beginning of the budget period, educational status at the time of first service. One commentator objected to this grouping of participants. This writer thought, for example, that an EOC participant without a GED at the outset of the period who earned his or her equivalency degree over the course of the budget period should be included in calculations for objectives b–d (student financial aid, postsecondary admissions, and postsecondary enrollment); the current instructions would disallow this since the participant would not *at the outset of the period* have been a high school senior or graduate or the possessor of an equivalency degree. Another writer thought that the form should use language identical to that of the objectives, i.e., "during each budget period," not at the beginning and end of the period. A third writer suggested substituting "at the time of first service in the budget period" for the current language "at the beginning of the academic year coincident with the reporting period or, for new participants served after the beginning of the academic year, the educational status at time of first service."

Discussion: The Department will be able to reach determinations on whether objectives have been met only if two chronological points are used to compare a participant's status. Without such clear points, determinations may become confusing and inconsistent. The Department sees no problem in using language other than "during the budget period" since the two points in the form simply refer to the parameters of the period: for example, if a "college-ready" participant in Talent Search applied for financial aid by the end of the budget period, he or she necessarily did so during the budget period. We thus see no conflict between the language used in the form and that used in the objectives. **Action taken by ED:** While the Department has not changed its intent to use comparison at two chronological points, we agree that the language "at time of first service in the budget period" is more concise and workable than previous language and that it would cover both those individuals who were participants at the outset of the budget period and those who joined the project later. The Department replaced the old language with the new.

*Absence of a place to report* "*fifth-year*" *grantees*' "*Other project accomplishments*"

As noted in the form and instructions, some projects whose 2006–07 budget period was part of a grant begun prior to 2006 chose to inform the Department that they would use approved objectives developed for 2002 as the basis for calculating prior experience points. One individual objected that the draft annual performance report provides no opportunity for such grantees to report on objectives that they may have established for themselves in addition to those required by TRIO; in the 2005–06 form, a section of the report entitled "Other Project Accomplishments" accommodated a discussion of such "customized" objectives.

Discussion: In the interest of including in the annual performance report only data needed for the purposes cited in section 1 of this statement, the

Department declines to add this additional requirement. **Action taken by ED:** None.

*Structure of the report*

A number of individuals thought that the report would be easier to use if it were separated into two, one for Talent Search and other for EOC.

Discussion: The Department thought that the data needed for the two programs could be most efficiently requested in one combined report, given that both programs can serve target schools and that each program can, under circumstances stated in the regulations, serve the other program's primary constituency. The sections relevant to only one program are identifiable both in the form and the instructions and can be read separately. For the online version of the report, as soon as the project enters its PR number, the application will take the user only to the relevant sections (for example, a Talent Search project will not see online section III for EOC). **Action taken by ED:** As with the online version of the form, the Department has improved the layout of the form and reordered it so as to make the sections applicable to each program more apparent.

*Students taking postsecondary courses while still in high school*

One commentator asked for more clarity regarding where to count high school students who take postsecondary or Advanced Placement classes. **Action taken by ED:** The Department has added language to the instructions to re-emphasize that such coursework does not constitute enrollment in a program of postsecondary education.

*Further information on types of postsecondary institutions shown for both programs, Section IV*

Two commentators wanted definitions for the types of postsecondary institutions listed in section IV for both programs. **Action taken by ED:** The instructions for the form now refer users to the relevant section of the 1998 Amendments to the Higher Education Act of 1965.

*Scholarships*

Two writers asked whether students who applied for scholarships could be included in the count of participants applying for financial aid. **Action taken by ED:** The Department has amended the instructions to make clear that we do indeed consider applications for scholarships to be one kind of application for financial aid.

*Documentation*

Several commentators wanted to know what documentation should be retained by the grantee for various kinds of data provided in the report; for example, what would the Department consider adequate evidence that a student had applied for financial aid? **Action taken by ED:** Separate from the annual performance report instructions and consistent with the program regulations (34 CFR 643.32(c) for Talent Search and 34 CFR 644.32 (c) for EOC), the Department will provide grantees additional guidance regarding recordkeeping.

9. The Department of Education will not provide payment or gifts to respondents.

10. No assurances of confidentiality are provided to the respondents, except as provided by the Privacy Act. There are no statutory or regulatory requirements for assurances of confidentiality.

11. The 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. Estimated hour burden of this collection of information is six hours (5.5 hours for professional staff to organize the information using computerized technology and 0.5 hours for clerical staff to enter the data into the Web-based form). We estimate approximately 645 respondents (510 Talent Search and 135 EOC). The performance reports are submitted annually.

| | |
|---|---|
| Estimated number of respondents | 645 |
| Estimated preparation time | 6 |
| **Total estimated burden hours** | **3,870** |

Estimated burden: Six hours per respondent.

*Estimated annualized cost to respondents*: 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:

| | |
|---|---|
| Professional staff<br>(645 respondents X 5.5 hours @ $35 per hour) | $124,163 |
| Clerical staff<br>(645 clerical staff members X 0.5 hours @ $18 per hour) | 5,805 |
| **Total estimated cost to respondents** | **$129,968** |

13. There are no other costs to the respondents. Grantees are required by program regulations to collect and maintain this information. The costs to transmit the data electronically via the Web are 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; and collecting, aggregating, and disseminating the information.

Professional staff to update report form and prepare clearance package:

| | |
|---|---|
| $40 per hour X 40 hours | $1,600 |
| Overhead costs (facilities, administration, accrual of leave, and fringe benefits; estimated at 50% of salary) | 800 |

Clerical staff to type, route, and copy report form:

| | |
|---|---|
| $18 per hour X 10 hours | 180 |
| Overhead costs (50% of salary) | 90 |

Other Department staff to review and approve the request:

| | |
|---|---|
| $50 per hour X 6 hours | 300 |
| Overhead costs (50% of salary) | 150 |

OMB review (estimated):

| | |
|---|---|
| $50 per hour X 8 hours | 400 |
| Overhead costs (50% of salary) | 200 |

Posting performance report application to World Wide Web:

| | |
|---|---|
| $40 per hour X 2 hours | 80 |
| Overhead costs (50% of salary) | 40 |

| | |
|---|---|
| Annual updates to Web application, Web site hosting, help desk, and data processing (contractor's costs) | 70,000 |

| | |
|---|---|
| Analyses of data and preparation of national summary reports and individual project data (contractor costs) | 90,000 |

Professional staff to review and edit reports for dissemination:

| | |
|---|---|
| $40 per hour X 40 hours | 1,600 |
| Overhead costs (50% of salary) | 800 |
| Printing and mailing of reports | 10,500 |
| **Total** | **$176,740** |

15. The total burden hours reported in item #16 of Part I: Information Request reflect an increase because of a larger number of respondents than those reported previously; the burden hour per respondent is unchanged.

The estimated cost to the Federal government (item #14) has been revised based on a review of actual contractor's costs for Web-based data collection, data analysis, and report preparation and on salary increases for Government staff.

16. Collected information will be analyzed annually to determine if each grantee is meeting its approved goals and objectives and to award prior experience points. Performance measures and efficiency measures for the two programs, based on data conveyed in grantees' annual performance reports, are disseminated in the Department's Annual Program Performance Plan. While a final schedule is yet to be determined, over the next few years the Department plans to release on the Web data on performance and efficiency measures *at the grantee level*; this more detailed reporting will be possible due to improvements in accuracy that the program anticipates will result from incorporating the new standard objectives into the report form.

The Department has prepared and disseminated three reports on the Talent Search and EOC programs, both printed and on the Web, covering demographic information on grantees and participants and program outcomes (e.g., postsecondary enrollment rates). The purpose for these reports is to share national information at the program level with project staff and, as appropriate, with members of Congress and the larger education community. For the future, TRIO staff members anticipate producing one concise but detailed report per grant cycle that will cover both demographics and outcomes (with comparisons to the previous cycle) and may be released both in print and electronic form. The program also aims to provide timely, annual release, via the Web, of a set of tables conveying the most important data about the program. (The reports published to date are available at http://www.ed.gov/programs/triotalent/resources.html and http://www.ed.gov/programs/trioeoc/resources.html.)

17. This report form and the Web site will display the expiration date for OMB's approval of the information collection.

18. There are no exceptions to the certification statement.

**B. Collections of Information Employing Statistical Methods**

This collection does not employ statistical methods.