

Annual Performance Report for Grants under the
Ronald E. McNair Postbaccalaureate Achievement Program
Supporting Statement for Request for Approval under the Paperwork
Reduction Act and 5 CFR 1320
Supporting Statement

A. Justification

1. The Department of Education (Department) is requesting approval to extend the expiration date of the currently approved Annual Performance Report (APR) form for the Ronald E. McNair Postbaccalaureate Achievement (McNair) Program (OMB No.: 1840-0640) for a period of three months to allow the Department to capture all of the information from the currently funded grantees for the entire grant award period. The extension of the APR until December 30, 2007 will allow the Department to collect consistent project data from all of the grantees funded during the FY 2003 grant award cycle. The currently approved form expires September 30, 2007, three months before the due date of the APR form from the current grantees.

The Department uses the information collected to make decisions on whether to issue non-competing continuation grants to funded grantees under the McNair Program. In addition, the information contained in the reports is used to assess prior experience points during the competitive cycle of the program. The McNair Program provides Federal financial assistance in the form of discretionary grants to institutions of higher education and combinations of those institutions for the purpose of providing academic and other support services to prepare low-income, first- generation college students, and students from groups underrepresented in graduate education for doctoral study.

The McNair Program is authorized by Title IV, Part A, Subpart 2, Section 402E of the Higher Education Act of 1965, as amended (P.L.102-325); the program regulations in 34 CFR Part 647; and the Education Department General Administrative Regulations (EDGAR), Parts 74, 75, and 77, 79, 82, 85, and 86. The authorizing statute is included in the attached application booklet. The respondents under the collection are institutions of higher education or combinations of those institutions.

2. The annual performance report requests statistical as well as student information on individual projects which is used to determine progress in meeting funded objectives and milestones which are integral to the success of the project. Further, the information is used during the assessment of prior experience and up to fifteen additional points may be earned by grantees during the competitive cycle in addition to the score earned by their new application for funding based on the authorizing

legislation, program regulations, and EDGAR. Failure to collect this information would prevent the awarding of appropriated funds since essential information would not be available for evaluating the applications in accordance with the authorizing legislation, program regulations and EDGAR. Further, failure to collect this information would impede the awarding of non-competing continuation grants to grantees due to lack of information needed to determine if the projects are making satisfactory progress toward the achievement of their funded objectives.

In addition, the annual performance reports are used for the purposes of budget submission to OMB; Congressional hearing testimonials; Congressional inquiries; performance measuring; and responding to inquiries from higher education interest groups and the general public.

3. The data being requested allows the grantees to use computerized data systems to collect, retrieve, and report the requested information. A web-based software application has been developed for grantees to enter the data online and submit the entire report via the Internet. The McNair projects have been submitting the annual performance report via the Internet for the past four to five years. For project year 2005-06, 99.5% of the current grantees submitted via the Internet. Our goal for the 2006-07 data collection is to have all projects submit the annual performance report data via the Internet.

The data collected is summary information on project participants and services and poses a low-level security risk. Nevertheless, the web site is secured to ensure the data are only seen by authorized individuals and are protected from network hackers.

4. Since the information submitted in the report is unique to each respondent, no duplication exists as far as can be determined. There is no other collection instrument that is available to collect the information that is being requested.
5. This information collection does not involve small businesses or other small entities.
6. The collection of performance reports is required annually. Collection of information on a less frequent basis is not feasible. These reports are used to determine if the grantee is making satisfactory progress in meeting the goals and objectives proposed in its initial application, prior to awarding continuation funding. In addition, the information is needed to award prior experience points to grantees. Without this data collection, the Federal TRIO Programs will be unable to award non-competing continuation awards, use the data to assess the prior experience provision of the authorizing statute, or respond to the GPRA, PART, and efficiency measures requirements, and developing improved policies for program administration.
7. With one exception, no information will be collected in the manner covered under any of the special circumstances outlined. The exception is that respondents are required to retain participant records for more than three years. In order to assess the impact of the program services on participating students' academic progress, grantees

are required to track the academic progress of all prior-year participants until they attain a doctoral degree, or until they are inactive in the pursuit of their academic objective for five years.

8. We published both 60-day and 30-day Federal Register notices to solicit public comments. Due to the small number of currently funded projects (178 currently funded), project staff are frequently contacted by telephone, at technical assistance workshops, state, regional and national meetings, and during on site monitoring visits.
9. The Department does not provide any payments or gifts to respondents.
10. The Department's disclosure policies adhere to the provisions of the Privacy Act.
11. The annual 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 burden hours for this collection of information is 5 hours. We estimate approximately 178 respondents x 1 report each.

Estimated number of respondents	178
• Estimated preparation time	5 hours
• Total estimated burden hours	890

(Estimated Burden: 5 hours Total -- Number of hours [preparation time] divided by the total number of respondents equals estimated burden hours.)

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:

Estimated annual costs to respondents:

Professional (178 personnel X 4.5 hours @ \$35 per hour)	\$28,035
Clerical (178 clerical X 0.5 hours @ \$16 per hour)	<u>1,424</u>
Total estimated costs to respondents	\$29,459

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

14. Estimated annual cost to the Federal Government	
Professional staff to develop clearance package (GS-14 employee) 40 hrs. @ \$50.00 per hour	\$2,000.00
Overhead cost related to facilities, administration, and other indirect cost plus accrual of leave and fringe benefits @ 50% of salary of \$2,000	\$1,000.00
Clerical staff to type, route, and copy report form \$16 per hour X 5 hours	\$80.00
Overhead costs: \$80 X 50 percent of salary	\$40.00
Other Department staff to review and approve the request: (GS 15 employee) \$60 per hour X 14 hours = \$840.00 (GS 14 employee) \$50 per hour X 20 hours = \$1,000.00 Overhead costs: \$1,840.00 X 50 percent = \$920.00	\$2,760.00
OMB Review (estimated) 8hrs x \$40.00 per hour	\$320.00
Overhead costs: \$320 X 50 percent	\$160.00
Other Administrative Costs	
Posting annual performance report to World Wide Web (2 hours X 1 staff @ \$35 per hour)	\$70.00
Annual updates to web application, web-site hosting, help desk and data processing (contractor costs)	\$100,000.00
Analyses of data and preparation of national summary and individual project reports (contractor costs)	\$125,000.00
Professional staff to review and edit reports for dissemination \$50 per hour X 40 hours	\$2,000.00
Overhead costs: \$2,000 X 50 percent	\$1,000.00
Total Annual Government Cost	\$234,430.00

15. The total burden hours requested are less because of the budget period of one of the McNair grantees that received a five-year award in an earlier competition, ending September 30, 2005.
16. The national profile reports of aggregated data include the following types of information: (1) demographic profiles of project participants; (2) profiles of project services and activities; and (3) project outcomes (i.e., postsecondary persistence and graduation). The purpose of these reports is to share national information on the McNair Program projects with project staff and, as appropriate, members of the Congress and the larger education community. The reports provide descriptive outcome information that currently funded McNair Program projects can use for a variety of purposes, including developing plans to address the requirements of GPRA, PART, and efficiency measures requirements, and developing improved policies for program administration.

The data may also be used to supplement other data collection efforts sponsored by the Department, including a study of the McNair Program conducted by the Department's Planning and Evaluation Service.
17. The Department will display on the form the expiration date for the OMB approval as required.
18. There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods statement.

The collection of information does not employ statistical methods.