

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**A. Justification**

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

The College Access Challenge Grant Program (CACGP) is authorized by the Title VII, Part E of Higher Education Act of 1965, as amended. A copy of the authorizing statute is attached. CACGP is a formula grant program that is designed to foster partnerships among Federal, State and local government and philanthropic organizations to increase the number of underrepresented students who enter and remain in postsecondary education. CACGP funds are awarded to States based on the relative number of persons between the ages of 5 and 17 and 15 and 44 living below the poverty line within the State. The statute requires States to submit an application to receive grant funding and explicitly outlines what States must include in the application (i.e., the capacity to deliver services and activities, use of funds, required matching contribution, and administrative capacity).

2. Indicate how, by whom, and for what purpose 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 U.S. Department of Education (ED) will use applications to determine if States are capable of implementing quality CACGP grant projects, in accordance with statutory and regulatory requirements. Applications are also used as a basis for monitoring performance, assessing if substantial progress is being made in accomplishing goals and objectives of grant projects. This is a new collection.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

CACGP will require applicants to submit applications electronically to an e-mail mailbox to minimize burden and costs associated with submission. This method of submission will allow ED staff to efficiently and expeditiously review applications to assess the quality of programmatic and budgetary information. If an applicant cannot submit an application electronically, the applicant may seek a waiver in advance to submit the application by mail.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

This information does not duplicate any other information collection effort. The information collection is relevant only to grant applications under CACGP, which is a new grant program. There is no similar information available in other forms or as the result of other information collections.

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

The information collection does not affect small businesses or other small entities.

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

Without the data collection, ED could not comply with the statutory requirements of the CACGP since it specifically requires States to submit a plan to receive funding. Data collection is conducted as infrequently as possible. Data is collected only when there are funds available to award.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- Requiring respondents to report information to the agency more often than quarterly
- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it
- Requiring respondents to submit more than an original and two copies of any document
- Requiring respondents to retain records for more than three years
- 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
- Requiring use of a statistical data classification that has not been reviewed and approved by OMB
- That 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
- Requiring respondents to submit proprietary trade secrets, 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.

No special circumstances exist for CACGP. Information collection will be conducted in a manner consistent with established guidelines.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agencies 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 that notice and describe any actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. We will

ED will publish a Federal Register notice for which the general public will have 30- and 90-day periods to provide comments. The 30-day period will be implemented prior to submission to OMB. ED will assess the validity of all comments and implement suggestions/ideas that enhance the quality of the application.

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

No payments or gifts to respondents have been made and none are planned or contemplated.

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

There are no assurances of confidentiality.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers these questions necessary; the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The data collection contains no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. 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 estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours of customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-1.
- Provide estimates of annualized cost to respondents of 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.

ED estimates that 58 applicants will apply for CACGP funding. The average burden hours per response is 40 hours. The number of responses per applicant is one. The data collection occurs only in years in which funding is available to make new awards. The total burden hours for this

year are 2,320. Fifty-eight applications x 30 hours to prepare application x \$30 per hour = \$52,200. Fifty-eight applications x 10 hours for operation, maintenance and services x \$10 per hour = \$5,800.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting our information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

ED estimates that the total annual cost burden to respondents or record keepers resulting from the collection of information is as follows:

a. Capital/Start Up Cost:

There is no start up costs involved with the CACG program.

14. Provide estimates of annualized cost 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 the collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

ED estimates that the cost to the Federal government is as follows:

Developing application/clearance package (2 staff x 40 hours x \$35/hour) =	\$2,800
Staff time to evaluate applications (3 staff x 80 hours/staff member x \$35)	<u>\$8,400</u>
Total	\$11,200

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

The CACGP is a new program.

16. 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, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There are no plans for publication of this information.

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

ED plans to display the expiration date of the OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions", of OMB Form 83-1.

There are no exceptions to the certification statement.

**A. Collection of Information Employing Statistical Methods.**

This data collection does not employ statistical methods.