

U.S. Department of Education's Response to OMB's Questions on

1890-0004 (ED 524B) and 1890-NEW (ED 524)

January 31, 2008

ED 524B

OMB Question 1: When a program uses this form, is there a standard process for approving the performance measures (or any revisions to them over time), especially for programs that have not been PARTed, and for ensuring those measures are built into grant notices?

ED Response: The ED 524B is a post-award performance reporting form. Grantees are asked to report in the ED 524B on performance measures for the program that were published in the Federal Register in the application notice for the grant competition. This ensures that grant applicants are aware of the program's performance measures that they will be required to report on, prior to the grants even being made. It is also ED policy that program offices include the program performance measures in the grant application package for the program competition. The web-based version of the application package must include a hyperlink to the reporting form that will be used for the program. Further, performance measures and expected performance outcomes are topics that are addressed by the ED program staff member responsible for monitoring the grant during the "Post-Award Performance" conference. This conference (held by phone, at workshops, in person, via email or in writing) is conducted with the grantee's project director or other authorized representative after a new grant is made.

Regardless of whether the program uses the ED 524B or another OMB approved program-specific performance reporting form, the program is still required to follow the same process for informing potential grant applicants of the program performance measures in the Notice Inviting Applications, in the application package and later in the post-award performance conference for grantees.

ED program offices, in consultation with ED's Budget Service, are responsible for developing the program's performance measures. The Budget Service obtains OMB's approval of the performance measures. These measures are then included in the application notice in the Federal Register for the program's grant competition.

In rare cases where performance measures have not been established for the program at the time of the grant competition (e.g., for a brand new program), the application notice indicates that successful grantees will be informed of the performance measures as soon as they have been developed.

Additionally, in rare cases where a program revises its performance measures during the course of the project period for current grantees, ED will inform the grantees in writing regarding the change and indicate expectations regarding data collection and reporting on the revised measures. In the case of programs that have been assessed using the PART, ED cannot change the performance measures without OMB approval. In the case of other competitive grant programs, Budget Service staff consult OMB about changes in performance measures.

Grantees are reminded of the program's performance measures that they are required to report on in the "Dear Colleague Letter" that accompanies the ED 524B. However, as noted earlier, in most cases, grantees are *first* informed of the performance measures for the program that they will be required to report

on in the ED 524B in the Federal Register application notice and the application package for the grant competition.

OMB Question 2: How will OMB be made aware of the adoption or revision of performance measures when the standard form is used?

See response to Question 1 above regarding ED consultation with and/or approval by OMB of new or revised performance measures for discretionary grant programs. Except where noted, the process outlined above applies to the adoption and revision of performance measures for programs using either the ED 524B performance report or another OMB-approved program specific performance report.

OMB Question 3: What percentage of filers are anticipated file electronically?

ED Response: We anticipate that 60% of filers will file the form electronically (Also, please refer to item 16 on the “Information Collection Submission Worksheet, Part 1: Information Collection Request” for this collection.)

OMB Question 4: Is the burden less for electronic filers because of the pre-populated fields?

ED Response: The burden is slightly less (perhaps by a few minutes) for electronic filers because of the pre-populated fields. The pre-populated fields in the current e-Reports system are related to identifying information only (e.g., Grantee Name; PR/Award Number; Grantee Address, etc.). These data are readily accessible to grantees from the Grant Award Notification and would take only a few minutes to enter manually if the form was submitted in hard copy.

OMB Question 5: Section A – Because there are only three options under Measure Type, did you consider making this field a check box?

ED Response: The electronic version of the ED 524B in the e-Reports system has a drop down list where the Project Director can quickly select the appropriate measure type. Regarding creating a check box for this field, we would prefer not to redesign the actual hardcopy or electronic version of the form at this time given that we anticipate that ED will transition to the government-wide performance progress report (SF-PPR) format sometime in the near future.

OMB Question 6: Cover Sheet

a. Please insure that there is sufficient space allowed for the data requested. For example, please add additional space for the PR/Number and NCES ID.

ED Response: We agree that insufficient space is provided on the Word version of the ED 524B Cover Sheet and have updated the Word version of the form. Please note there is already sufficient space for these data items in the PDF and PDF fillable versions of the form as well as in the e-Reports system.

b. Please make the headings on the cover sheet consistent with the headings used on the instruction sheet. For example, item 2 should read Grantee NCES ID on both sheets. Please compare all headings for consistency.

c. Please be consistent with the use of periods in parentheses. For example, see item 1 and item 4.

d. Please be consistent with capitalization. For example, see differing treatment of “instructions” and “Instructions” in the bold text.

ED Response to b., c., and d.: Changes made.

e. Item 10 – does “Yes” mean that there is a need for approval or that approval was obtained? Please clarify the question.

ED Response: A “Yes” response indicates that annual certification of IRB approval was obtained. We have clarified the Cover Sheet question and the instructions. Proposed changes to Cover Sheet question 10 and the instructions are in red below. Also see the track changes version of the ED 524B instructions.

Cover Sheet:

Human Subjects (Annual Institutional Review Board (IRB) Certification)

10. Is the annual certification of institutional review board (IRB) approval attached? ___ Yes ___ No ___ N/A

Instructions:

10. Human Subjects (Annual Institutional Review Board Certification (IRB))

-- Annual Performance Reports Only:

Annual IRB certification is required if Attachment HS1, Continuing IRB Reviews, was attached to the GAN. Check "yes" if annual IRB certification is required and attached to the ED 524B as instructed in Attachment HS1. Check "no" if annual IRB Certification is required by Attachment HS1, but is not attached to the ED 524B. Please indicate the reason why the IRB certification is not attached (e.g., the research has been completed) under Section C (Additional Information) of the Project Status Chart. Check "N/A" if annual IRB certification does not apply to your grant (i.e., no human subjects research is being conducted under this grant or Attachment HSI was not attached to the GAN.)

f. Item 11 – are grantees able to provide a specific date? Is a month and year more feasible?

ED Response: It does not seem to be a problem for grantees to provide a specific date. We would like more precise information than just the month and the year, since we often need all of the grantees data submitted to the Department before we can begin to aggregate and analyze the data. A specific date lets us know whether we can expect the data at the beginning of the month or the end of the month, which is a big difference for our planning purposes for data analysis tasks.

OMB Question 7: Instruction Sheet

- a. Bottom of page 1 – There are no instructions for item 6 on the cover sheet.
- b. Top of page 2 – There is an extra comma after “Leave blank”.
- c. Cover Sheet, Item 8 – Please define “match/cost share” in the instructions.
- d. Cover Sheet, Item 11 – Please define “complete” in the instructions.
- e. Section A, Quantitative Data – How would a grantee handle this item if the targets have changed over time? Which target should they use, the most recent?

ED Response: Questions 7. a – d: Changes have been made. Question 7 e.: Revised targets should be used if they have been approved by ED. Changes have been made to the instructions for this item.

f. Section B, first bullet – Does this request duplication of the data submitted on the cover sheet? If so, why?

ED Response: The first bullet, is not a duplication of data, it is just a reminder to the grantees that they must also complete items 8a. – 8c. related to Budget Expenditures on the Cover Sheet, in addition to the applicable questions in Section B – Budget Information.

ED 524

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OMB Question 2: Is the burden less for electronic filers?

ED Response: The burden would be slightly less for electronic filers than for those submitting in hard copy, e.g., photocopying time is eliminated; data for the form can be easily saved and accessed later; and the form can be submitted electronically via Grants.gov along with the entire grant application which saves on mailing time.

(Please note that within the Paperwork Burden Statements for both the ED 524B and ED 524, we updated the last four digits of the zip code for where to send comments on the accuracy of the estimates or suggestions on for improving the form.)