Upward Bound Programs: Upward Bound, Upward Bound Math-Science, and Veterans Upward Bound
Request for Approval under the Paperwork Reduction Act and 5 CFR 1320
Supporting Statement for the Upward Bound Programs' Annual Performance Report

A. Justification

1. The Department of Education (ED) is requesting reinstatement of the previously approved performance report form that was discontinued on December 31, 2007 (OMB No. 1840-0762), with revisions, to collect data under the Upward Bound programs. No one has used the discontinued document since December 31, 2007.

The Upward Bound programs are part 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 goal of the Upward Bound programs is to increase the academic preparedness and motivation of low-income individuals (both youth and veterans) who are potentially first-generation college students so as to help them complete their secondary education, enroll in programs of postsecondary education, and successfully pursue those programs (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 645.32). 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 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 2007–08; these standards were included in the application packages for the programs that OMB approved in 2006. The Department believes that use of the new objectives will result in more accurate and uniform reporting of data and in more efficient determination of results. The form also allows the Department to determine to what extent projects met the absolute priority of the 2007 grant competition in Upward Bound (Upward Bound Math-Science and Veterans Upward Bound were not included in the priority). This priority was intended to increase the proportion of students in the program (ninth- and tenth-graders, particularly ninth-graders at high risk of academic failure) who research suggests would benefit the most from sustained exposure to Upward Bound.

The revised annual performance report also reflects TRIO's intent to reduce burden on grantees. TRIO staff members made every effort to identify fields that had not been needed for the purposes cited above. A significant number of fields involving specific services offered by projects were eliminated (a few remain for Upward Bound and Upward Bound Math-Science), while other expendable fields were identified as well. Overall, the number of fields for Upward Bound and Upward Bound Math-Science has been reduced from 100 to 56, and from 65 to 39 in Veterans Upward Bound.

The Department collects information from the Upward Bound programs' grantees under the authority of Title IV, Sections 402A(c)(2) and 402C of the Higher Education Act of 1965, as amended, the program regulations in 34 CFR 645, 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 645.3]).

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.

Using performance report data submitted in 2004–06, TRIO staff members calculated the prior experience points each grantee had earned--a critical element in determining which applicants were to receive grant awards for periods beginning fall 2007. In fall 2007, ED also relied exclusively on performance report data to calculate GPRA performance and efficiency measures. In spring 2007, the Department released on the Web performance data for 2004–05 *at the grantee level* based on Upward Bound and Upward

Bound Math-Science grantees' annual performance reports; the next year's grantee-level data should be posted by June 30, 2008.

3. The annual performance report is designed to allow grantees to use computerized data systems to collect, retrieve, and report the requested information. Since 2001, grantees of the Upward Bound programs have used collected data in computerized data systems and have submitted that data via a Web-based software application that allowed them to enter data online and submit the report via the Web.

The proposed revision of the collection represents an improvement on previous versions' use of technology. A new Web-based data collection system is being developed in conjunction with the clearance and approval of the new version of the annual performance report. The new system will allow grantees to download data from the previous year's annual performance report; grantees may then update and add data. The new system will also utilize online validations and error checks to increase the accuracy and completeness of the data at the time of submission.

Since the data that will be submitted contain confidential information on participants, the secured Web site meets the Department of Education's data security standards for sensitive data, including improved password and site access procedures. Further, to ensure that the data are accessible only to authorized individuals and protected from unauthorized uses, a grantee must submit the participant level data via the Web application.

After completing the entire report on the Web, the grantee is instructed to print a copy of the completed report form. Section I of the printed report form includes signature lines for the project director and the certifying official for the grantee institution. The grantee must submit, via fax, a signed copy of Section I of the report form to certify that the information submitted electronically is accurate, complete, and readily verifiable.

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; appropriate notices have been published in the *Federal Register.* A summary of comments received is attached.

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. TRIO staff attended the September 2007 annual convention of the Council for Opportunity in Education, a large organization representing most of the TRIO projects, and participated by conference call in two interactive training sessions for TRIO grantees held in October 2007 and April 2008. Most recently, in May 2008, TRIO staff made presentations on annual performance reporting to approximately 300 Upward Bound project directors at a technical assistance workshop convened by TRIO. At all of meetings staff heard about certain issues important to grantees that have aided TRIO in knowledgeably revising the annual performance report form.

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. A Privacy Impact Assessment is in place (and posted to the Department's Web site); ED is currently preparing a System of Records Notice.

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. Given the significantly reduced number of fields in the annual performance report (see section #1 above), the estimated hour burden has been reduced from 15 to nine hours (8.5 hours for professional staff to organize the information using computerized technology and 0.5 hours for clerical staff to enter the data electronically). We estimate approximately 1,143 respondents (971 Upward Bound, 126 Upward Bound Math-Science, and 46 Veterans Upward Bound).   The performance reports are submitted annually.

Estimated number of respondents	1,143
Frequency of response	Annual
Annual hour burden	9
Total estimated burden hours	**10,287**

Estimated burden: Nine 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
(1,143 respondents X 8.5 hours @ $37 per hour) $359,474

Clerical staff
(1,143 clerical staff members X 0.5 hours @ $19 per hour) 10,859

Total estimated cost to respondents **$370,333**

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:

$42 per hour X 80 hours $3,360
Overhead costs (facilities, administration, accrual of leave, and fringe benefits; estimated at 50% of salary)
1,680

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

$19 per hour X 15 hours 285
Overhead costs (50% of salary) 143

Other Department staff to review and approve the request:

$52 per hour X 10 hours 520
Overhead costs (50% of salary) 260

OMB review (estimated):

$52 per hour X 8 hours 416
Overhead costs (50% of salary) 208

Posting performance report application to World Wide Web:
$42 per hour X 2 hours 84
Overhead costs (50% of salary) 42

Development of new Web functionality, Web site hosting, help desk, and data processing (contractor's costs)*
200,000
Analyses of data, calculation of PE points, and preparation of national summary reports and individual project data, etc. (contractor's costs)

400,000

Professional staff to review and edit reports for dissemination:

$42 per hour X 40 hours	1,680
Overhead costs (50% of salary)	840
Printing and mailing of reports	10,500
Total	**$620,018**

* Because new Web applications will be developed in conjunction with the new annual performance report, contractor costs for Web development will be higher for the 2008 data collection than in subsequent years (2009 and 2010). The estimated costs for Web site hosting, help desk support, and data processing will not increase in 2009 and 2010. The estimated annual contractor costs for the Web development shown above represent an annual average for the three years.

15. The program change of 10,287 hours reflects the previous collection's expiration on December 31, 2007. TRIO staff anticipated the expiration and allowed it to occur because grantees will not need to submit data under the instrument until the end of November 2008. It should be noted that, for the previous collection, the total hours requested were 14,250; despite an increase in respondents, the total hours have now decreased by 3,963 due to the significant reduction in the number of fields in the collection instrument. 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 programs, based on data conveyed in grantees' annual performance reports, are disseminated in the Department's Annual Program Performance Plan. Based on the annual performance reports, ED will release on the Web 2005–06 *grantee-level* performance and efficiency measures for Upward Bound and Upward Bound Math-Science in 2008.

In 2004 and 2005, the Department prepared and disseminated detailed "profile" reports on the three Upward Bound programs, covering demographic information on grantees and participants and program outcomes (e.g., postsecondary enrollment rates). These reports were intended to share national information at the program level with project staff and, as appropriate, members of Congress and the larger educational community. More concise reports on the programs will be published in 2008; similar reports are to be released in print and electronic form biannually.

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.