

Application for Grants under the Student Support Services Program, HEA Title IV-A Supporting Statement

A. Justification

1. The U. S. Department of Education (Department) is requesting reinstatement, with changes, of the previously approved application for new grants un the Student Support Services (SSS) Program. The previous application package expired and was discontinued on July 31, 2007 (OMB Number 1840-0017).

The application is used to award new grants under the (SSS) Program. The SSS Program provides grants to institutions of higher education for projects offering support services to low-income, first generation or disabled college students to increase their retention, transfer and graduation rates from programs of postsecondary education.

The Program is authorized by Title IV, Part A, Sections 402A and 402G of the Higher Education Act of 1965, as amended (20 U.S.C. 1070a-11); and governed by the program regulations in 34 CFR Part 646 and the Education Department General Administrative Regulations (EDGAR) 34 CFR Parts 74, 75, 77, 79, 80, 81, 82, 84, 85, 86, 97, 98 and 99. Copies of the authorizing statute and program regulations are attached. The respondents under the collection are institutions of higher education or combinations of institutions of higher education.

2. The application package requests programmatic and budgetary information needed to evaluate new applications and make funding decisions based on the authorizing legislation, program regulations, and EDGAR. Failure to collect this information would prevent the awarding of appropriated funds as essential information would not be available for evaluating the applications in accordance with the authorizing legislation, program regulations and EDGAR.
3. For the first time in fiscal year 2008, as a part of the Department's goal to increase the electronic submission of applications for grants, applications for grants under the SSS Program will be submitted electronically via the Grants.gov portal. We estimate that the Department will receive 99 percent of the applications electronically.

The application package has been prepared in a format that allows easier and faster posting of information on the Web. Prospective applicants will be able to view and download the application through the FIND function on Grants.gov at www.grants.gov.

4. Since the information submitted in the application 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 Department uses this information to make new multi-year grant awards only. Collection of information is every four years. Applicants are only required to respond to this information collection once in each grant cycle. If the information is not collected or is collected less frequently, the Department would not be able to evaluate applications and make funding decisions based on the provisions in the authorizing statute and the program regulations.
7. No information will be collected in the manner covered under any of the special circumstances outlined.
8. The Department's Regulatory Information Management Group will solicit comments on this information collection in the Federal Register, pursuant to 5 CFR 1320.8(d), upon submitting the collection to OMB. A summary of any comments received will be shared with OMB. The Department will also solicit informal views and comments from persons outside the Department during yearly national and regional educational conferences. The Department will publish 60-day and 30-day Federal Register notices to allow public comment on this collection.
9. The Department will not provide any payments or gifts to respondents.
10. The Department's disclosure policies adhere to the provisions of the Privacy Act.
11. The application 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 66,000 hours. We estimate approximately 1500 respondents. Applications are submitted every three years.

Estimated number of respondents.....	1500
Estimated preparation time.....	44 hours
Total estimated burden hours.....	66,000

Estimated Cost to Respondents

Professionals: 1500 personnel X 34 hours X \$30 per hour=\$1,530,000.00 Overhead at 50% of salary=990,000.00	\$2,520,000.00
Clericals: 1500 x 10 hours x 12 per hour-180,000.00 Overhead at 50% of Salary = 90,000.00	\$270,000.00
Total estimated staff costs to respondents	\$2,790,000.00
(a) One time cost to applicant: Use of computer equipment to search for data and generate application in required format. Computer time is \$200 and Printing is \$10.00 (1500 applicants x \$210)	\$315,000.00

(b) Operation Cost Annual cost to applicant to find and maintain application materials is \$100. (1500 applicants x \$100)	\$150,000.00
Estimated annual costs to respondents	\$465,000.00

(Staff Costs: \$2,790,000.00 + Annual Costs: \$465,000.00)=
Total Annual Costs to Respondents: \$3,255,000.00

13. Annual Costs to Respondents (capital/start-up, and operation and maintenance): The total for the capital and start-up cost components for this information collection is zero. This information collection will not require the purchase of any capital equipment nor create any start up costs.

14. Cost to Federal Government:

Professional staff to develop clearance package (GS-14 employee) 160 hrs. @\$55.00 per hour	\$8,800.00
Overhead cost related to facilities, administration, and other indirect cost plus accrual of leave and fringe benefits @50% salary.	\$4,400.00
Application printing (200 copies x \$1).	\$200.00
Application mailing (50 copies x \$2.00)	\$100.00
Other Department staff to review and approve the request GS-15 Employee	\$630.00
Estimated Sub-total	\$14,130.00
Cost for Federally-supervised review of applications	
Outside field reviewers – 525 SSS reader @ \$1,100 each	\$577,500.00
Forms and Web-site development costs for E-Application Process	\$4,200.00
Processing applications – staff (12 staff x 40 hours x \$48 per hours=\$23,040) (Overhead cost: \$23,040 x 50 percent = \$11,520)	\$34,560.00
Contractor logistical support for workshops, achieving prior unfunded applications, application processing, field reading and slate preparation (12 weeks-reading)	\$3,165,727.00
Staff time for conducting supervised review. (4 weeks x 5 control reviews, and 25 panel chairpersons) (30 staff x 160 hours x 4,800 hrs x \$48 per hour=\$230,400) (Overhead cost: \$230,400 x 50 percent=\$115,200)	\$350,400.00
Staff time for generating slate (3 staff x \$48 x 40 hours=\$5,760) (Overhead cost: \$5,760 x 50 percent = \$2,880)	\$8,640.00
Staff time to review and approve funding recommendation (4 hours per grant award x 975 awards) (975 awards x 4 hours per awards x \$48 per hour = \$187,200) (Overhead cost: \$187,200 x 50 per cent = \$93,600)	\$280,800.00
Staff time to generate, approve, and issue grant awards	

(6 hours per award x 975 awards=5,850/12 = 487.5) (12 staff x \$48 x 487.5 hours = \$280,800) (Overhead cost: \$280,800 x 50 percent = \$140,400)	\$421,200.00
Total Estimate Cost to Government (Competitive year)	\$4,857,697.00
Annual Monitoring Cost	
(975 Student Support Services Grants @) (10 hours per project x \$48.00 per hour =\$468,000) (Overhead cost: \$468,000 x 50 percent = \$234,000.00)	\$702,000.00
<i>Total Annual Government Cost</i>	\$702,000.00

15. It should be noted that the previous burden hours estimate was based on 1200 applications and it is expected that a greater number will be received. The current estimate is a reflection of the actual numbers of applications received during the last competition. We also discussed with current grantees the amount of preparation time and discovered that the previous preparation burden hours were seriously insufficient and additional hours were included. A difference of +25,200 burden hours is shown in Item 12 because the previous collection expired.
16. Results of collected information will not be published.
17. This application package will display the expiration date for OMB approval of the information collection.
18. There are no exceptions to the certification statement.
- B. The collection of information does not employ statistical methods.