Talent Search and Educational Opportunity Centers Programs
Request for Approval under the Paperwork Reduction Act and 5 CFR 1320
Supporting Statement for the TS and EOC Annual Performance Report Form

A. Justification

1. The Department of Education (Department) is requesting approval of the current performance report form that will expire on September 30, 2008 (OMB No. 1840-0561), with revisions, to collect data under the Talent Search (TS) and Educational Opportunity Centers (EOC) programs.

In this revision, the Department has updated the form and instructions to reflect the final guidance on maintaining, collecting, and reporting racial and ethnic data. Since the Department is interested in collecting the same type of data for the 4-year project cycle, no major revisions were made to the collection.

The TS and EOC programs are two 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 specific goal of the TS and EOC programs is to help youth and adults from disadvantaged backgrounds complete secondary education and enroll in programs of postsecondary education (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 643.22 for TS; 644.22 for EOC). 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 two 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."

The Department collects information from TS and EOC grantees under the authority of Title IV, Part A, Subpart 2, Chapter 1, Section 402B and F of the Higher Education Act of 1965, as amended, the program regulations in 34 CFR 643 and 644, 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 643.3 and 644.3]).

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.

With performance report data submitted in fall 2005, TRIO staff members calculated the prior experience points each grantee had earned--a critical element in determining which applicants received grant awards for periods beginning fall 2006. In fall 2006, ED relied exclusively on performance report data to determine, for GPRA purposes, percentages of EOC and TS participants who had enrolled in postsecondary education.

3. Since 1999, TS and EOC grantees have used collected data in computerized data systems and have submitted that data via a Web-based software application that allows them to enter data online and submit the report via the Web. While 56 percent of grantees submitted reports electronically in 1999, now all grantees do so.

The data collected are summary information, not data on individual participants; thus the reports are a low-level security risk. Nonetheless, the Web site is secured to ensure that the data are seen only by authorized individuals and are protected from network hackers. Further, online data edits are in place to ensure the accuracy and integrity of the data submitted.

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. 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 also solicits 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 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.

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. Estimated hour burden of this collection of information is six hours (5.5 hours for professional staff to gather the information using computerized technology and 0.5 hours for clerical staff to enter the staff into the Web-based form). We estimate approximately 596 respondents (471 TS and 125 EOC). The performance reports are submitted annually.

Estimated number of respondents	596
Estimated preparation time	6
Total estimated burden hours	**3,576**

Estimated burden: Six 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 (596 respondents X 5.5 hours @ $35 per hour)	$114,730
Clerical staff (596 clerical staff members X 0.5 hours @ $18 per hour)	5,364

Total estimated cost to respondents	**$120,094**

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 in designing the report form; securing clearance; and collecting, aggregating, and disseminating the information.

Professional staff to update report form and prepare clearance package:

$55 per hour X 40 hours $2,200
Overhead costs (facilities, administration, accrual of leave, and fringe benefits; estimated at 50% of salary)
800

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

$18 per hour X 10 hours	180
Overhead costs (50% of salary)	90

Other Department staff to review and approve the request:

$50 per hour X 6 hours	300
Overhead costs (50% of salary)	150

OMB review (estimated):

$50 per hour X 8 hours	400
Overhead costs (50% of salary)	200

Posting performance report application to World Wide Web:

$40 per hour X 2 hours	80
Overhead costs (50% of salary)	40

Annual updates to Web application, Web site hosting, help desk, and data processing (contractor's costs)
70,000

Analyses of data and preparation of national summary reports and individual project data (contractor costs)
90,000

Professional staff to review and edit reports for dissemination:

$40 per hour X 40 hours 1,600

Overhead costs (50% of salary)	800
Printing and mailing of reports	10,500
Total	**$177,340**

15. The total burden hours reported in item #16 of Part I: Information Request reflects a decrease because of a smaller number of respondents than those reported previously; the burden hour per respondent is unchanged. The estimated cost to the Federal government (item #14) is unchanged.

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 two programs, based on data conveyed in grantees' annual performance reports, are disseminated in the Department's Annual Program Performance Plan. Over the next few years, the Department plans to release on the Web, data on performance and efficiency measures *at the grantee level*; this more detailed reporting will be possible due to improvements in accuracy that the program anticipates will result from incorporating the new standard objectives into the report form.

The Department has prepared and disseminated three reports on the TS and EOC programs, both printed and on the Web, covering demographic information on grantees and participants and program outcomes (e.g., postsecondary enrollment rates). The purpose for these reports is to share national information at the program level with project staff and, as appropriate, with members of Congress and the larger education community. For the future, TRIO staff members anticipate producing one concise but detailed report per grant cycle that will cover both demographics and outcomes (with comparisons to the previous cycle) and may be released both in print and electronic form. The program also aims to provide timely, annual release, via the Web, of a set of tables conveying the most important data about the program. (The reports published to date are available at http://www.ed.gov/programs/triotalent/resources.html and http://www.ed.gov/programs/trioeoc/resources.html.)

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.