Supporting Statement for college.gov℠
Career Tool and I'm Going Guide Features

U.S. Department of Education

December 30, 2008

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 the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Federal Student Aid office in the U.S. Department of Education ("Department") seeks clearance and approval for the Career Tool and the I'm Going Guide features on **college.gov** SM. The collection of information for college.gov is necessary in order to help fulfill the Department's mission to strengthen the Federal commitment to assuring access to equal educational opportunity for every individual. This includes: "to improve service to students and other participants in the student financial assistance programs authorized under title IV, including making those programs more understandable to students and their parents." (P.L. 105-244, Section 101, Part D, Section 141(a)(2)(A)).

The Secretary of Education's Action Plan for Higher Education calls for expanding the accessibility, affordability and accountability of higher education for more Americans. In response to this action plan, and based on input and feedback from students and the higher education community, the Department created **college.gov** SM.

College.gov SM serves as a primary source of information and resources about planning, preparing and paying for postsecondary education, including 2- or 4-year colleges and universities, vocational and career schools. More importantly, college.gov is intended to provide inspiration and hope to all students (with a focus on low income and first generation students), and encourage them to consider and pursue a postsecondary education.

College.gov SM was released on May 25, 2008. For a future release, we would like to add the functionalities that would help connect high school students' individual interests and traits to possible paths of study and careers.

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 target audience ("users") for **college.gov** SM is 9^{th}-12^{th} grade high school students. The site also provides some content for parents/guardians and counselors/teachers. The target audience for this information clearance is college students and graduates with careers.

Within the Career Tool feature, by selecting their interests, students can see college graduates (young adults) who have careers that match those interests. The site would show 24 different college grads at a time, but the goal would be to have about 75 that we could “shuffle” on the tool’s display.

Each college graduate’s profile would provide their first name, major, career field, and advice for students interested in their field of study.

For the I’m Going Guide feature, students can select current college students to view their profiles to see why and how they went to college. The site would show 9 different college students at a time and would change throughout the year.

Each student’s profile would include their first name, a photo, major and a little about the student, such as where they are studying, and tips for other students. The students are being profiled to provide inspiration and motivation to other students, and provide a face students can relate to.

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.

All information is collected in an electronic format through an on-line survey.

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.

The Web site’s collection is not duplicated within the U.S. Department of Education, and, to our knowledge, is unique in government.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The collection of information does not impact 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 Career Tool and I’m Going Guide features, the Department will not be able to provide tools and functionality on the **college.gov** SM Web site that will attract and engage the target audience of 9th-12th grade high school students.

College.gov SM will also lose the peer-to-peer aspect of the site and will not be able to feature students and their inspirational stories that can provide the motivation and hope (particularly to underrepresented populations) that college is possible.

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

The Web site does not collect information in a manner that would invoke special circumstances.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency=s 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 actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

We have published the required Federal Register Notices allowing public comment.

The Secretary of Education’s Action Plan for Higher Education calls for expanding the accessibility, affordability and accountability of higher education for more Americans. In response to this action plan, the Under Secretary held regional summits and embarked on a listening tour where she met with students and representatives of the higher education community to find out what was working, and what wasn’t working or was missing. These discussions identified the need for **college.gov** and provided the foundation for its development. Student discussions also highlighted the need to reach students where they are (on the web) and to provide them with tools and features similar to what is available on sites they currently use. These discussions also formed the basis for the Career Tools and I’m Going Guide features.

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

Respondents will not receive money or gifts of value. They will receive “virtual” money, which can be used to redeem “virtual” items online. Ex. Respondent would receive “Fluff Munny” which can be used to purchase food and clothing for their Fluff Pet, which is a “virtual” pet the respondent, would care for online.

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

The Privacy Act provides protection to Web site users. Our privacy disclaimer follows. ‘…We collect no personal information about you unless you choose to provide that information to us. If you want to know more about how we record non-personal information about your visit or how we use information that you voluntarily submit,…’

Information on the following topics is included in our current privacy policy:

- Non-personal information we record
- Interactive Tools
- Survey
- Security Intrusion and Detection
- Information from E-mail You Send to Us

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. This justification should include the reasons why the agency considers the 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 Web site does not collect information of a sensitive, personal nature (as defined).

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

- hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for 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-I.

- 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.

We estimate that it will take approximately twenty minutes for a respondent to answer the survey questions. We project that there will be 300 respondents for the Career Tool and 100 respondents for the I’m Going Guide in FY09. Therefore, the estimated annual hour burden is 133 hours. (See below)

Career Tool:

Annual Time Estimates for (Individual):
Minutes to Answer Survey Questions: 20 Minutes

Annual Time Estimates (Cohort):
Total Annual Time: 100 hours (20 * 300 = 6,000 / 60 minutes = 100)

I'm Going Guide:

Annual Time Estimates for (Individual):
Minutes to Answer Survey Questions: 20 Minutes

Annual Time Estimates (Cohort):
Total Annual Time: 33 hours (20 * 100 = 2,000 / 60 minutes = 33)

Annual Time Estimate for Career Tool and I'm Going Guide Estimates: 133 hours

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 out 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.

There is no annual cost burden to respondents or record keepers.

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

Current cost to the federal government: The cost to the federal government to develop the Career Tool and I'm Going Guide features is $208,137.

Future cost to the federal government: **college.gov** SM, like most Internet-based products, will incur annual operating costs. The cost for managing, maintaining and moderating the account registration and inspirational message features will be built into the overall site maintenance and operations costs. The annual cost is estimated to be about $300,000. This amount is based upon an independent government cost estimate and may be less.

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

This information collection is new, therefore all burden is considered program change.

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.

Information collected via the Web site will not be published.

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.

The Federal Student Aid office does not seek approval to exclude the expiration date.

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

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 17 on Form OMB 83-I is checked "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe the potential respondent universe (including a numerical estimate) and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, state and local government units, households, or persons) in the universe covered

by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

2. Describe the procedures for the collection of information, including:

- Statistical methodology for stratification and sample selection.

- Estimation procedure.

- Degree of accuracy needed for the purpose described in the justification.

- Unusual problems requiring specialized sampling procedures, and

- Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

3. Describe methods to maximize response and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other persons who will actually collect and/or analyze the information for the agency.

Exemptions to the certification requirement are not requested.