

Supporting Statement for Paperwork Reduction Act Submission

Graduate Assistance in Areas of National Need (GAANN) Performance Report

A. Justification

1. The Department of Education is requesting a revision of the previously approved GAANN performance report that expires on May 31, 2009. The overall goal of the program is to increase the number of students with superior academic ability and financial need that receive graduate degrees in areas of national need.

There are two versions of the performance report that are part of this package: the annual report and the final report. GAANN grants are awarded for a period of three years. Grantees are required to submit an annual performance report in April for each budget period of the grant, and a final performance report 90 days after the grant expires. The annual performance report asks for information specific to the budget year for which the report is being submitted. The final performance report asks for information specific to the third budget year of the grant, and also requires the grantee to update the educational status of all students who have received a GAANN fellowship at anytime during the project period. This information allows the Department to track the number of GAANN fellows who obtain their graduate degree during the grant period.

Both performance reports collect race and ethnicity data from an aggregated level. All grantees will be in full compliance with OMB Race/Ethnicity data collection Guide requirements issued in October 2007. They will be in full compliance with the Final Guidance on Maintaining, Collecting, and Reporting of Racial and Ethnic data to the U.S. Department of Education, by 2010.

The information is collected under the authority of Title VII, Part A, Subpart 2, Section 711 of the Higher Education Act of 1965, as amended; the program regulations in 34 CFR 648; and the Education Department General Administrative Regulations (EDGAR) in 34 CFR 74.51. ***(Copies of the authorizing statute and the program regulations are attached)***. Further, the performance report form lends itself to the collection of quantifiable data needed to respond to the requirements of the Government Performance and Results Act (GPRA).

2. The Department uses the data collected from the performance reports to: (a) monitor grantee compliance with program regulations (34 CFR 648) in administering grant funds and selecting GAANN fellows; (b) collect the quantifiable data needed to evaluate project outcomes; and (c) assist in providing technical assistance to strengthen individual projects.

The performance reports are used to collect programmatic data for purposes of annual reporting, budget submissions to OMB, Congressional hearings,

Congressional inquiries, and to respond to inquiries from higher education interest groups and the general public.

3. Grantees use a web-based system to electronically retrieve and submit the requested information in the performance report. The electronic version of the performance report automatically saves grantee information and student level data entered in one year for use in the following year. Therefore, the data does not need to be re-entered, only updated when changes occur. This assists in reducing the burden to grantees, particularly with regard to the final report, which requires updates to the educational status of all students that have been funded over the life of the grant.
4. Since the information submitted in the performance reports is specific to the GAANN grant project, there is no duplication. There is no other collection instrument available to collect the information necessary to meet the purposes described in item 2 above.
5. Institutions of higher education are the sole recipients of GAANN grants. There is no impact on small businesses or small entities.
6. Collection of information is annual. Collection of information on a less frequent basis would impede the Department's ability to determine if the grantee is making satisfactory progress in meeting the goals and objectives proposed in its initial application for funds.

Further, failure to collect this information would hinder the Department's ability to carry out its required responsibility to perform an overall assessment of the GAANN Program and its impact.

7. There are no special circumstances that would cause this information collection to be conducted in such a manner, except for the five year record-keeping retention period, which is necessary since the statute requires that the grantee provide five years of support to students, only three years of which is funded by the GAANN grant.
8. Comments and feedback regarding the frequency, clarity of instructions, reporting format, and data elements included in the performance report have been received from Program Oversight and grantee institutions. The feedback received was the impetus for the changes that have been incorporated into the performance report. The changes made in the report since the last OMB submission are primarily for the purpose of streamlining and clarifying the intent of the questions. We will publish 60-day and 30-day Federal Register Notices to allow public comment.
9. The Department will not provide any payment or gifts to respondents.
10. There is no program regulatory requirement for assuring confidentiality, except as provided by EDGAR (34 CFR 75.740 – Privacy), and the Family Educational Rights and Privacy Act of 1974.

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. The estimated total reporting burden for this data collection is 2,475 hours. This includes a total of 225 respondents, each with an estimated response time of 11 hours. The burden hours have not been reduced since the previous collection package was submitted for clearance. Comments and feedback regarding the frequency, clarity of instructions, reporting format, and data elements included in the performance report have been received from Program Oversight and grantee institutions. The feedback received was the impetus for the changes that have been incorporated into the performance report. The changes made in the report since the last OMB submission are primarily for the purpose of streamlining and clarifying the intent of the questions.

Estimated number of respondents	_____	225
Estimated response time		
Annual report	_____	11 hours
Final report	_____	12 hours
Average response time	_____	$[(10.5 \times 2) + 12] / 3 = 11$ hours
Frequency of collection	_____	1 annually
Total estimated burden hours	_____	2,475

The burden to each individual respondent, established at 10.5 hours, is based on feedback from respondents during previous competitions.

The estimated annual cost to a single respondent is as follows:

Professional staff (1 personnel x 8 hours x \$35 per hour)	_____	\$280
Clerical staff (1 clerical x 2 hours X \$8 per)	_____	\$16
Total estimated cost per respondent	_____	\$296
Total estimated cost to all 225 respondents (225 respondents x \$296)	_____	\$66,600

13. There are no other costs to the respondent except those that would be customary and usual business practices.
14. Estimated cost to the Federal Government:

Task	Cost	Hours	Number of Staff	Hours Total	Total Cost
Securing OMB approval once every 3 years.	\$42/hr	15	4	60	\$2,520
Other Departmental staff to review and approve the request	\$42/hr	5	3	15	\$630
Estimated OMB review	\$42/hr	8	3	24	\$1,008
Review of reports and analysis of data	\$42/hr	120	2	240	\$10,080
Total Annual Cost					\$14,238

15. Question #12 reflects an update in the dollar amounts.
16. The information collected from the performance reports will be analyzed to determine if each grantee is meeting the approved goals and objectives for the project. Further, the information will be aggregated into a single program report and evaluated to determine if the program as a whole is meeting its purpose. The aggregated data in the report will include demographic profiles of project participants, interim and final project outcomes (such as progress towards and attainment of the Masters or Doctoral degrees), and program profiles of types of services provided.

The data will be reported at the conclusion of the three-year grant period. Grants are scheduled to expire in August of the third year of funding. Final reports are then due to the program office 90 days after the expiration of the grant. Program staff will analyze the data for reporting in January. No complex analytical or statistical techniques will be used.

17. The instrument will display the expiration date for the OMB approval of the information collection as required.
18. There are no exceptions to the certification statement.