OMB Forms Justification Package

Learn and Serve America Program and Performance Reporting System (LASSIE)

PART A: JUSTIFICATION

A1. 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 Learn and Serve America Program was established by the National and Community Service Trust Act of 1993 (PL 103-82) to support efforts in schools, higher education institutions and community-based organizations to involve young people in meaningful service to their communities while improving academic, civic, social and career-related skills. The Learn and Serve America program is administered by the Corporation for National Service (CNCS or 'the Corporation'), which distributes approximately $40 million in grants annually to state agencies; institutions of higher education; nonprofit organizations; K12 local educational agencies and schools; and US Territories and Indian tribes. Funding is allocated for three broad streams of programs:

- K-12 school-based service-learning programs, which support school and school district efforts to promote service-learning among school-aged youth;
- higher education grants, which support efforts to involve students in colleges and universities in service-learning; and
- innovative and community-based service-learning and research grants, which support efforts to involve youth in community-based service-learning activities.

Under the legislation authorizing the Learn and Serve America Program (42 U.S.C. 12639) and the Government Performance and Results Act of 1993 (P.L.103-62; GPRA), the Corporation is required to regularly evaluate its programs and to report to Congress annually on progress towards meeting its goals. As part of this effort, the Corporation launched, in 2004, an on-line Learn and Serve America Program and Performance Reporting System (www.lsareports.org), more commonly referred to as LASSIE. The system collects annual data on the activities supported by Learn and Serve America grant funds. The purpose of this submission is to request the renewal of the data collection system. The data collection instrument includes minimal modifications that respond to changes instituted with the 2009 Edward M. Kennedy Serve America Act, improve question clarity, and reduce burden, while simultaneously ensuring consistency with data collected in previous years to the greatest extent possible.

The Learn and Serve America grant program is highly decentralized, with the majority of funds subgranted (and in some cases sub-subgranted) to local schools, school districts, higher education institutions, and nonprofit organizations, which then are responsible for carrying out service-learning activities. Due to this decentralization and based on the recommendation from a

2001 audit by the Office of Inspector General, the LASSIE system is designed to collect program data directly from those grantees and subgrantees that directly manage Learn and Serve America-funded programs. The LASSIE system tracks the distribution of grant funds by asking grantees to provide information through the system on those organizations that receive Learn and Serve America subgrants. The data collection process is described in detail in Section B3 of this submission.

A2. Indicate how, by whom, and for what purposes 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 LASSIE system is designed to collect information on program-related outputs and outcomes from institutions that are operating service-learning programs using Learn and Serve America funds. Data collected through the system fall within five basic types of information: characteristics of institutions receiving Learn and Serve America funding; characteristics of program participants and service-learning activities; community partnerships; policies, practices, and supports for service-learning programs; and training and technical assistance activities. The survey instrument is modified to contain program-appropriate questions for the various funding streams within the Learn and Serve America grant program. The current submission proposes a different process by which survey versions are assigned to respondents. Previously, the survey version was determined by the grantee, subgrantee and sub-subgrantee organizational type; however, because there are situations in which organizational type is not consistent with the grant types, the survey questions were not always relevant to the activities carried out under the grant type. As a result of these issues, as well as the introduction of new initiatives under the 2009 Edward M. Kennedy Serve America Act, we propose a modular approach. Under this approach, the survey is broken up into three sections (Program Participants and Activities; Institutional Supports for Service-Learning; and Training Technical Assistance Activities). The section on Program Participants and Activities is determined by grant type (K-12 School-Based, Higher Education, and Innovative and Community-Based); the section on Institutional Supports for Service-Learning is based on the respondent’s organizational type (K-12 school, K-12 school district, higher education institution, and community-based organization); and the section on Training and Technical Assistance Activities is common to all grant and organizational types. Given the uniqueness of some of the new program initiatives under the Serve America Act, entirely separate survey instruments have been developed for Summer of Service and Youth Engagement Zones grant programs. The on-line system will automatically determine the appropriate versions of the survey based on the respondents’ grant type and responses to the system’s grant profile. Access to hard copies of the survey via the on-line system’s help page will include an interactive function to help respondents identify the appropriate versions.

The data collected through the LASSIE system is used by the Corporation for several major purposes. The first is to meet its obligations to report on the operations of the Learn and Serve America program and the program’s progress towards meeting its goals. In that regard, the data from the system is used by the Corporation in reporting on the operation and outcomes of the Learn and Serve America program in its annual *Performance and Accountability Report* to Congress and its annual *Congressional Budget Justification*. In addition, data collected through the system has been used to fulfill data requests from the Administration and Congress on the types of activities operated using Learn and Serve America funds.

The second major use of the data is to inform the Corporation's efforts to continually improve the effectiveness of its programs. The data from these reports, along with evaluation data generated by other Corporation-funded studies, has been used in assessing the degree to which Corporation policies are promoting growth and expansion of service opportunities and in examining such policy-related questions as the relationship between grant size and program growth, institutionalization among the different types of grantee organizations, the relationship between specific institutional supports (such as the presence of a coordinator, or the integration of service-learning into professional development) and the extent to which staff and students at an institution are involved in service-learning.

Finally, the Corporation has designed the on-line system to provide individual-level data to each institution and to their grantors, as well as aggregate-level data for all users of the system (grantees, subgrantees, etc.) through an on-line reporting function. For grantees, the data (particularly the on-line data) may be used in documenting the performance of their subgrantees and to support their own reporting to the Corporation. Data may also be used at both the grantee and subgrantee level to place local programs in a state or national context (for example, comparing local outcomes with those of all programs in the state or nation) as part of their own reporting and/or program improvement efforts. The Corporation also provides a public use data with individual-level responses without any organizational- or grant-identifying information, which is made available to the general public through the public-interface portion of the website.

The data collection activity is carried out by staff at the Corporation in conjunction with a reporting system team from two external research organizations and one media technology company. The primary contractor is Abt Associates, based in Cambridge, Massachusetts, which is currently under a task order contract with the Corporation and has been the primary contractor since the system was initially implemented in 2004. Abt Associates is being assisted on this project by the Center for Youth and Communities at Brandeis University in Waltham, Massachusetts and RelyOn Media LLC in Shelburne Falls, MA. Together, the three organizations bring extensive experience in the design and operation of data collection systems with Learn and Serve America grantees and programs.

A3. Describe whether and to what extent the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The primary data collection mechanism for the LASSIE system is a web-based, online data collection system. The web-based system, which is located at **http://www.lsareports.org**, is designed to provide several key features aimed at promoting compliance and accuracy of reporting. These include: (a) an online registration process that creates a data file of grantee and subgrantee organizations; (b) an online reporting management function that allows grantee and subgrantee organizations to review submissions and manage subgrantee reporting; (c) the capacity to automatically review program and performance reports for missing or out-of-range responses; (d) electronic worksheets (eWorksheets) for collecting program data via the Internet; and (e) a data reporting function that will allow real-time reporting of aggregate results for use by all the organizations participating in the reporting system (the Corporation, grantees, and subgrantees). In addition, grantees and subgrantees are able to enter and update information throughout the program reporting period, which simplifies the data collection and reporting process. The web-based system provides for a substantial increase in quality control and responsiveness for the system. Since the 2004-2005 reporting cycle, the survey has had response rates of over 90 percent, with 98 percent of programs reporting in the last data collection cycle (2009-2010).

The Corporation continuously seeks to maximize ease of use and minimize the reporting burden for grant recipients. User comments are collected each year and adjustments to the system are made in response to this feedback. The system provides a number of features to assist with survey completion, including downloadable versions of the survey instruments, an on-line tutorial, quick start guide, on-line instructions and 'pop-up' definitions to assist with completion of the survey. A help desk is also available to users during the data collection period; users can contact the help desk by phone or email and receive a response within one business day.

A4. Describe efforts to identify duplication. Show specifically why similar information already available cannot be used or modified for use for the purpose described in item 2 above.

This reporting system represents the only national collection of data on Learn and Serve America programs. While some individual CNCS grantees collect data from their Learn and Serve America subgrantees as part of their program reporting, there is no other source of consistent national data for the Learn and Serve America program.

A5. If the collection of information impacts small businesses or other small entities, describe any methods to minimize burden.

The reporting system does not impact small businesses or other small entities.

A6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacle to reducing burden.

The LASSIE system is the primary source of program and outcome data for the national Learn and Serve America program. No other source of information is available to permit the Corporation to respond to its measures determined under GPRA-related requirements or to the general requirement to evaluate its programs under its authorizing legislation (i.e., 42 U.S.C. 12639). Because the Corporation is required to report on Learn and Serve America program activities on an annual basis, this basic program reporting data needs to be gathered every year.

A7. Explain any special circumstances that would cause an information collection to be conducted in a manner that (a) required respondents to report information to the agency more often than quarterly; (b) requires respondents to prepare written response to a collection of information in fewer than 30 days after receipt of it; (c) requires respondents to submit more than an original and two copies of any document; (d) requires respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax record for more than three years; (e) in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study; (f) requires the use of a statistical data classification that has not been reviewed and approved by OMB; (g) includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or (h) requires respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that will require information to be collected in a manner that is not consistent with the requirements outlined above.

A8. 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 the notice and describe actions taken by the agency in response to the 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 instructions and recordkeeping, 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 three 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.

The initial 60-day Federal Register notice was published on March 30, 2010 and ended June 1, 2010 (Volume 75, no. 60, pages 15692-15693). A copy is attached. No comments were received.

As part of the review process, the Corporation and its contractors consulted with a portion of Learn and Serve America new and continuing grantees during the annual grantee conference in October of 2009 and several of the program subgrantees, both new and continuing, at the National Service-Learning Conference in March of 2010. During these sessions, grantees and subgrantees provided the Corporation with their perspectives on the accessibility of data, clarity of instructions, types of data requested and ease of use. In addition, the Corporation has reviewed comments and questions submitted from the system users to the LASSIE help desk and program office over the previous three years.

The final versions of the forms being submitted reflect the input we received.

A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There will be no payments or gifts to respondents.

A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The LASSIE system includes a privacy policy based on the Privacy Act of 1974 (5 U.S.C § 552a). The policy holds that the information collected is made available to the Corporation, any intermediary grantor (if applicable), and federal, state, or local agencies pursuant to lawfully authorized requests. Organizational contact information for those that receive Learn and Serve America funds is provided through the National Service-Learning Clearinghouse. In addition, all non-personally identifiable information may be provided to the public; personally identifiable information will not be provided to any other organizations without prior written permission.

The LASSIE system is password protected, limiting access to different levels of the system. The Corporation has completed and received acceptance of a System Security Plan and updates the system and System Security Plan as necessary to comply with FISMA requirements.

A11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other behaviors that are commonly considered private.

The proposed data collection contains no questions of a sensitive nature.

A12. Provide estimates of the hour burden of the collection of information. The statement should: (a) indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of expected hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. (b) if this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in line 13 of OMB Form 83-1. (c) provide estimates of annualized costs to respondents for 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.

The total hour burden for the Program and Performance Reporting Form is estimated at 1800 hours, based on an average of 1 hour for approximately 1800 respondents to gather information and complete the form. The time needed to complete the form can vary from approximately 30 minutes for an organization that primarily subgrants all of its funds to approximately 2 hours for sites operating multiple programs and who need to aggregate data from those programs.

These estimates are based on experience from prior years and have been deemed accurate and reasonable by users consulted. The response time includes time for brief review of project files as well as the time needed to complete the survey itself. The following table summarizes the number of respondents for the LASSIE survey and associated burden estimates and annualized costs to respondents.

Form	Respondents	Estimated Number of Respondents	Estimated Burden per Respondent (Hours)	Total Burden Estimate (hours)	Annualized Cost Estimate
LASSIE Survey	Grantees (state agencies, higher education institutions, nonprofits organizations, K12 local education agencies and schools, and US territories and Indian tribes) and subgrantees (schools and school districts, individual higher education institutions, and community-based organizations).	100 grantees and 1700 subgrantees	.5 hours to 2 hours, with an average of 1 hour	1800 hours	0
TOTAL		1800		1800	$0

A13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. Do not include the cost of any hour burdens shown in Items 12 and 14.

No additional data gathering or recordkeeping is required of respondents for this information collection activity.

A14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annual cost to the Federal government for the implementation of the LASSIE system is estimated at an average of $260,000, which includes costs associated with modification and maintenance of the on-line system and the collection, analysis, and reporting of data collected. The estimate is based on the cost for implementing the system for the previous six years.

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

There is an adjustment to Item 13 of OMB Form 83-I due to a decrease in the number of grants made under the Learn and Serve America program. The number of respondents has been adjusted based on the number of average number of respondents for the past two years.

There is no adjustment to Item 14 of OMB Form 83-I.

A16. 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.

Analyses of the data include basic descriptive analyses aimed at addressing questions related to the overall growth and performance of the Learn and Serve America program, and analyses aimed at identifying effective practices and institutional supports within the Learn and Serve America community. Analyses break out the results by grant type to identify differences between K-12 school-based, higher education-based and innovative and community-based service-learning grant programs.

The primary analysis consists of basic frequencies and cross tabulations to examine differences between different types of programs and/or the relationship between particular program characteristics; however, in some cases more sophisticated analyses including measures of association, multivariate analyses, and factor analysis may be used to examine the relationships between program or institutional characteristics and program outcomes. As part of the on-line reporting function, users of the system, including grantees, subgrantees, and public users have access to on-line reports with basic data provided; they also have the ability to download the data in order to develop their own cross tabulations and breakdowns so that they can identify patterns that will best serve their reporting needs.

The data from the LASSIE system are reported on an annual basis through several mechanisms, including the Corporation's Congressional Budget Justification and annual performance report. In addition to these formal reports, the Contractors and the Corporation conduct more focused analyses to answer specific policy and programmatic questions (i.e., those related to effective strategies) on an as-needed basis. While the major purpose of those reports is to inform internal Corporation decision-making, versions of those analyses may be disseminated to grantees and others (for example, as background papers) as part of a broader set of policy discussions. In those instances, the papers will include a discussion of the data sources and the analysis methods in a technical appendix to the papers.

Project Schedule

The schedule for the project is as follows:

Project Subtasks	Schedule
Receive OMB Approval	August 2010
Update on-line system based on modifications to the instruments approved by OMB	September – November 2010
Open up system for grantee reporting and eWorksheets data collection for the 2011 program year	Fall 2010
Conduct data collection for 2010 Summer of Service program	October – December 2010
Conduct data collection for the 2011 program year (K-12 Formula, Higher Education, and remaining Innovative and Community Based Service-Learning programs)	March 1, 2011-July 15, 2011
Clean and analyze 2011 program year data	July-September 2011
Prepare indicators for congressional reporting	Fall 2011
Provide data files for public use	September 2011
Open up system for grantee reporting and eWorksheets data collection for the 2012 program year	Fall 2011
Conduct data collection for 2011 Summer of Service program	October-December 2011
Conduct data collection for the 2012 program year (K-12 Formula, Higher Education, and remaining Innovative and Community Based Service-Learning programs)	March 1, 2012-July 15, 2012
Clean and analyze 2012 program year data	July-September 2012
Prepare indicators for congressional reporting	Fall 2012
Provide data files for public use	September 2012
Open up system for grantee reporting and eWorksheets data collection for the 20131 program year	Fall 2012
Conduct data collection for 20120 Summer of Service program	October – December 2012
Review instruments and data collection systems for necessary modifications; begin OMB clearance renewal process	Winter 2013
Conduct data collection for the 20131 program year (K-12 Formula, Higher Education, and remaining Innovative Service-Learning programs)	March 1, 2013-July 15, 2013
Clean and analyze 20131 program year data	July-September 2013
Receive OMB approval for renewal; initiate necessary modifications for future reporting	August 2013
Prepare indicators for congressional reporting	Fall 2013
Provide data files for public use	September 2013

A17. 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 expiration date will be displayed as required on the web-based and downloadable versions of the forms.

A18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submission,” of OMB Form 83-1.

There are no exceptions to the certification statement in Item 19.