

Annual Performance Report for Grants under the
Ronald E. McNair Postbaccalaureate Achievement Program

***Supporting Statement for Request for Approval under the Paperwork
Reduction Act and 5 CFR 1320***

Supporting Statement

A. Justification

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 Department of Education (Department) is requesting approval to extend the expiration date of the currently approved Annual Performance Report (APR) form for the Ronald E. McNair Postbaccalaureate Achievement (McNair) Program (OMB No.: 1840-0640) for a period of three years to allow the Department to collect consistent project data from all of the grantees funded during the FY 2007 grant award cycle and the last year of the extended grant award period from current McNair grantees, who were given a one-time, one-year extension due to the negotiated rulemaking process. The currently approved form expires November 30, 2010.

The Department uses the information collected to make decisions on whether to issue non-competing continuation grants to funded grantees under the McNair Program. In addition, the information contained in the reports is used to assess prior experience points during the competitive cycle of the program. The McNair Program provides Federal financial assistance in the form of discretionary grants to institutions of higher education and combinations of those institutions for the purpose of providing academic and other support services to prepare low-income, first-generation college students, and students from groups underrepresented in graduate education for doctoral study.

The McNair Program is authorized by Title IV, Part A, Subpart 2, Section 402E of the Higher Education Act of 1965, as amended (P.L.102-325); the program regulations in 34 CFR Part 647; and the Education Department General Administrative Regulations (EDGAR), Parts 74, 75, and 77, 79, 82, 85, and 86. The authorizing statute is included in the attached application booklet. The respondents under the collection are institutions of higher education or combinations of those institutions.

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 annual performance report requests statistical as well as student information on individual projects which is used to determine progress in meeting funded objectives and milestones which are integral to the success of the project. Further, the information is used during the assessment of prior experience and up to fifteen additional points may be earned by grantees during the competitive cycle in addition to the score earned by their new application for funding based on the authorizing legislation, program regulations, and EDGAR. Failure to collect this information would prevent the awarding of appropriated funds since essential information would not be available for evaluating the applications in accordance with the authorizing legislation, program regulations and EDGAR. Further, failure to collect this information would impede the awarding of non-competing continuation grants to grantees due to lack of information needed to determine if the projects are making satisfactory progress toward the achievement of their funded objectives.

In addition, the annual performance reports are used for the purposes of budget submission to OMB; Congressional hearing testimonials; Congressional inquiries; performance measuring; and responding to inquiries from higher education interest groups and the general public.

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 given to using technology to reduce burden.

The data being requested allows the grantees to use computerized data systems to collect, retrieve, and report the requested information. A web-based software application has been developed for grantees to enter the data online and submit the entire report via the Internet. The McNair projects have been submitting the annual performance report via the Internet for the past five years. For project year 2008-09, 100% of the current grantees submitted via the Internet.

The data collected is summary information on project participants and services and poses a low-level security risk. Nevertheless, the web site is secured to ensure the data are only seen by authorized individuals and are protected from network hackers.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Since the information submitted in the report 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. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.

This information collection does not involve 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.

The collection of performance reports is required annually. Collection of information on a less frequent basis is not feasible. These reports are used to determine if the grantee is making satisfactory progress in meeting the goals and objectives proposed in its initial application, prior to awarding continuation funding. In addition, the information is needed to award prior experience points to grantees. Without this data collection, the Federal TRIO Programs will be unable to award non-competing continuation awards, use the data to assess the prior experience provision of the authorizing statute, or respond to the GPRA, PART, and efficiency measures requirements, and developing improved policies for program administration.

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

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that 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 that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, 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.

With one exception, no information will be collected in the manner covered under any of the special circumstances outlined. The exception is that respondents are required to retain participant records for more than three years. In order to assess the impact of the program services on participating students' academic progress, grantees are required to track the academic progress of all prior-year participants until they attain a doctoral degree, or until they are inactive in the pursuit of their academic objective for five years.

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.

A 60 day notice was published on August 11, 2010. A 30-day Federal Register notice was published to solicit public comments. Due to the small number of currently funded projects (200 currently funded), project staff are frequently contacted by

telephone, at technical assistance workshops, state, regional and national meetings, and during on site monitoring visits.

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

The Department does not provide any payments or gifts to respondents.

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

The Department's disclosure policies adhere to the provisions of the Privacy Act – PL 95-379, 5 USC 552a. There is no assurance of confidentiality with respect to grant-required reports; however, grantees are instructed to insure that program participants are informed of their rights under the Privacy Act with respect to the disclosure of social security numbers. A disclosure statement is provided to students at intake or involving other activities that occur during their time with the McNair project.

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

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. 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 estimated 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 16 of IC Data Part 1.

- 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.

Estimated burden hours for this collection of information is 5 hours. We estimate approximately 200 respondents x 1 report each.

•	Estimated number of respondents	200
•	Estimated preparation time	5 hours
•	Total estimated burden hours	1,000
	o 200 hours – Reporting	
	o 800 hours - Recordkeeping	

(Estimated Burden: 5 hours Total -- Number of hours [preparation time] divided by the total number of respondents equals estimated burden hours.)

The burden hours allotted for recordkeeping and reporting burden includes activities related to the update and review of data, responses to inconsistencies in the data reported, and data entry into the web portal.

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:

Estimated annual costs to respondents:

Professional (200 personnel X 4.5 hours @ \$35 per hour)	\$31,500
Clerical (200 clerical X 0.5 hours @ \$16 per hour)	<u>1,600</u>
Total estimated costs to respondents	\$33,100

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 acquiring and maintaining 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.

Total Annualized Capital/Startup Cost	:	
Total Annual Costs (O&M)	:	

Total Annualized Costs Requested	:	

There are no other costs to the respondents.

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.

The largest portion of the Government’s cost is borne directly by the Department of Education in designing the report form, securing clearance of the form, and in collecting, aggregating and disseminating the information.

14. Estimated annual cost to the Federal Government	
Professional staff to develop clearance package (GS-14 employee) 40 hrs. @ \$50.00 per hour	\$2,000.00
Overhead cost related to facilities, administration, and other indirect cost plus accrual of leave and fringe benefits @ 50% of salary of \$2,000	\$1,000.00
Clerical staff to type, route, and copy report form	\$80.00
\$16 per hour X 5 hours	\$40.00
Overhead costs: \$80 X 50 percent of salary	
Other Department staff to review and approve the request: (GS 15 employee) \$60 per hour X 14 hours = \$840.00 (GS 14 employee) \$50 per hour X 20 hours = \$1,000.00 Overhead costs: \$1,840.00 X 50 percent = \$920.00	\$2,760.00
OMB Review (estimated) 8hrs x \$40.00 per hour	\$320.00
Overhead costs: \$320 X 50 percent	\$160.00
Other Administrative Costs	
Posting annual performance report to World Wide Web (2 hours X 1 staff @ \$35 per hour)	\$70.00
Annual updates to web application, web-site hosting, help desk and data processing (contractor costs)	\$100,000.00
Analyses of data and preparation of national summary and individual project reports (contractor costs)	\$125,000.00
Professional staff to review and edit reports for dissemination \$50 per hour X 40 hours	\$2,000.00
Overhead costs: \$2,000 X 50 percent	\$1,000.00
Total Annual Government Cost	\$234,430.00

15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.

The total burden of 1,000 hours and 200 responses requested are increased because of the additional 16 new grants funded in FY 2009 with set aside funds for new McNair grants.

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.

Results of the collected information 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 Department will display on the form the expiration date for the OMB approval as required.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods statement.

The collection of information does not employ statistical methods.