Supporting Statement for the
Application for Grants under the
Training Program for Federal TRIO Programs
Higher Education Act of 1965, as amended, Title IV-A

A.   **Justification**

1. The U. S. Department of Education (Department) is submitting a new application package for new grants under the Training Program for Federal TRIO Programs (Training Program). The previous application package was discontinued on April 30, 2009 (OMB Number 1840-0125).

    The application is used to award new grants under the Training Program. The Training Program provides grants to institutions of higher education and other private and public nonprofit institutions and organizations to train the staff and leadership personnel employed in, participating in, or preparing for employment in projects funded under the Federal TRIO Programs to improve the operation of these projects. The respondents under the collection are institutions of higher education or public or private nonprofit institutions and organizations.

    The proposed regulations for the Training Program would amend the selection criteria the Secretary would use to evaluate an application for a new grant to conform to current practice. Further, section 402A(c)(8)(C) of the HEA, as amended by the HEOA, has added requirements for a formal second review process for unsuccessful applicants. Therefore, the proposed regulations would add a new section that establishes processes and procedures for a second review of unsuccessful applications.

    The new application would include the changes to the selection criteria and describe the processes and procedures for the second review of unsuccessful applications. Specifically, an applicant for a Training grant would need to address one of the absolute priorities established in the Federal Register notice inviting applications for the competition. With the absolute priorities, the Department would establish the "need" for the proposed training; thus, it would be redundant to require an applicant to provide data in the application to support the need for the training project. Therefore, the Need selection criterion is no longer necessary. The proposed change would reduce the amount of information an applicant must include in its application.

2. The application package requests programmatic and budgetary information needed to evaluate new applications and make funding decisions. Failure to collect this information would prevent the awarding of appropriated funds as essential information would not be available for evaluating the applications in accordance with the authorizing legislation, program regulations and EDGAR.

3. For Fiscal Year 2010, as a part of the Department's goal to increase the electronic submission of applications for grant award consideration, Training Program applications will be submitted electronically via the Electronic Grant Application System (e-Application) accessible through the Department's e-Grants site. We estimate that the Department will receive 95 percent (%) of the applications electronically.

   Applicants will access the application package in the e-Application system through the Department's e-Grants Web site at: http://e-grants.ed.gov. Applicants will be required to register to use e-Application; instructions for registering will be available on the e-Grants website, and in the application package. After registering, applicants will receive an e-mail with their e-Grants password, which will enable them to use the site.

4. Since the information submitted in the application is unique to each respondent, no duplication exits as far as can be determined. There is no other collection instrument that is available to collect the information that is being requested.

5. This information collection does not involve small businesses or other small entities.

6. The Department uses this information to make new multi-year grant awards only. Collection of information is every two years. Applicants are only required to respond to this information collection once in each grant cycle. If the information is not collected or is collected less frequently, the Department would not be able to evaluate applications and make funding decisions based on the provisions in the authorizing statue and the program regulations.

7. No information will be collected in the manner covered under any of the special circumstances outlined.

8. Ed is seeking public comment as part of the current Proposed Regulations NPRM process.

9. The Department will not provide any payments or gifts to respondents.

10. There is no assurance of confidentiality.

11. The application does not include questions about sexual behavior and attitudes, religious beliefs or other items that are commonly considered sensitive and private.

12. We estimate 1,812 total burden hours are needed for this information collection, based upon 60 respondents needing approximately 30.2 hours each to apply.

    In order to reach this current 1,812 hour burden estimate, we reviewed the previous estimate when this application was last active, and factored in the changes resulting from the new proposed regulations.

The previous burden estimate was 2,640 hours, based upon 60 respondents needing 44 hours to complete. That estimate, however, was in error as the correct estimate should have been 2040 total hours, based upon 34 hours needed per respondent to complete, rather than 44.

The proposed regulations include a burden decrease of 240 hours (4 hours per respondent) for applicants who do not need to respond to the Need Section, as the Department had already assessed the training needs of its grantees and developed priorities under which they could submit applications.

Additionally, the proposed regulations include a formal second review process for unsuccessful applicants. We estimate that approximately ten percent of the applications will score within the funding band, resulting in 12 additional burden hours from the previous application (60 applications received x .10 = 6 applications in the funding band x 2 hours per applicant = 12).

Taken together, the 240 hour burden decrease plus the 12 hour increase result in a net total decrease of 228 hours since this information collection was last active.

> Estimated number of respondents………………..   60
> Estimated preparation time………………………   30.2 hours
> **Total estimated burden hours**………………   1,812

Estimated Cost to Respondents for Regular Submission

Professionals: 60 personnel x 19 hours x $30 per hour total = $34,200	$34,200.00
Clericals: 60 x 3 hours x $12 per hour total = $2,160	$2,160.00
Total estimated staff costs to respondents	*$36,360.00*
(a) One time cost to applicant: Use of computer equipment to search for data and generate application in required format. Computer time is $200 and printing is $10.00 (60 applicants x $210)	$12,600.00
(b) Operation Cost Annual cost to applicant to find and maintain application materials is $100. (60 applicants x $100)	$6,000.00
Estimated annual costs to respondents	*$54,960.00*

<u>Total Annual Costs to Respondents: $54,960</u>
(Staff Costs: $36,360 + $12,600 Annual Costs for responding)

Estimated Cost to Respondents for Appeals Submission

Professionals: 6 personnel x 10 hours x $30 per hour total = $1,800	$1,800.00
Clericals:	$144.00

6 x 2 hours x $12 per hour total = $144.00	
Total estimated staff costs to respondents for Appeals	*$1,944.00*
(a) One time cost to applicant: Use of computer equipment to search for data and generate application in required format. Computer time is $200 and printing is $10.00 (6 applicants x $210)	$1,260.00
(b) Operation Cost Annual cost to applicant to find and maintain application materials is $100. (6 applicants x $100)	$600.00
Estimated annual costs to respondents for Appeals	*$3,804.00*

<u>Total Annual Costs to Respondents for Appeals: $3,804</u>
(Staff Costs: $1,944 + $1,260 Annual Costs for responding)

13. Annual Costs to Respondents (capital/start-up, and operation and maintenance): The total for the capital and start-up cost components for this information collection is zero. This information collection will not require the purchase of any capital equipment nor create any start up costs.

14. Cost to Federal Government:

Professional staff to develop clearance package (GS-14 employee) 160 hrs. @$55.00 per hour	$8,800.00
Overhead cost related to facilities, administration, and other indirect cost plus accrual of leave and fringe benefits @50% salary.	$4,400.00
Other Department staff to review and approve the request	
GS-15 Employee	$630.00
OMB Review 8 hours x $45.00 per hour = $360.00 + 50% overhead = $180.00	$540.00
Estimated Sub-total	*$14,370.00*
Cost for Federally-supervised review of applications	
Outside field reviewers – 18 readers @ $1,100 each	$19,800.00
Processing applications – staff (4 staff x 40 hours x $48 per hour = $7,680) (Overhead cost: $7,680 x 50% = $3,840)	$11,520.00
Contractor logistical support for workshops, archiving prior unfunded applications, application processing, field reading and slate preparation (1 week-reading)	$33,217.00.
Staff time for conducting supervised review (1week x 2 control reviews, and 6 panel chairpersons) (8 staff x 40 hours x $48 per hour = $15,360) (Overhead cost: $15,360 x 50% = $7,680)	$23,040.00
Staff time for generating slate (3 staff x 40 hours x $48 per hour = $5,760) (Overhead cost: $5,760 x 50% = $2,880)	$8,640.00

Staff time to review and approve funding recommendation (10 awards x 4 hours per award x $48 per hour = $1,920) (Overhead cost: $1920 x 50% = $960)	$2,880.00
Staff time to generate, approve, and issue grant awards (6 hours per award x 10 awards = 60 hours) (60 hours x $48 per hour = $2,880) (Overhead cost: $2,880 x 50% = $1,440)	$4,320.00
Total Estimate Cost to Government (Competitive year)	*$117,787.00*
Annual Monitoring Cost	
(10 grants x 10 hours/grant x 1 staff x $55 per hour = $5,500) (Overhead cost: $5,500 x 50% = $2,750)	$8,250
Total Annual Government Cost	*$126,037.00*

15. Since this collection is technically new, all 1,812 hours of burden are considered new burden and represent a program change.

16. Results of collected information will not be published.

17. This application package will display the expiration date for OMB approval of the information collection.

18. There are no exceptions to the certification statement.

B.   The collection of information does not employ statistical methods.