

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

Application for Grants under the Historically Black Colleges and Universities (HBCU) and
Historically Black Graduate Institutions (HBGI) Programs
(CFDA # 84.031B)

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 HBCU program provides grants to historically Black colleges and universities to assist these institutions in establishing and strengthening their physical plants, academic resources and student services so that they may continue to participate in fulfilling the goal of equality of educational opportunity. Sections 325(a) and 326(d) of Title III, Part B of the Higher Education Act of 1965, as amended (HEA), and the governing regulations (34CFR 608.20; 609.20) require collection of information identified in the application package. Links providing access to these authorities are provided in the application package.

The collection of information requested in the application is necessary to permit eligible institutions to apply for grants under the HBCU and HBGI programs. Further, legislation requires the collection of the data in order for the Secretary to determine awards for each institution and to evaluate each institution's plans for grant funds.

Section 324, Part B of Title III, and [34CFR 608.31](#) (hyperlink provided) require that the Secretary collect Phase I formula data annually from the HBCUs in order to determine allotments to eligible institutions. Submission and collection of Phase II of the application process occur once at the beginning of each five-year cycle when the institution submits its five-year Comprehensive Development Plan (CDP). Section 326 (f) "Funding Rule" necessitates that HBGIs submit Phase I formula data annually in order to determine individual grant award amounts.

The Higher Education Opportunity Act of 2008 increased by six (6) the number of Historically Black Graduate Institutions (HBGI) or Qualified Graduate Programs (QGP), therefore the number of HBGIs is now 24.

In addition, the HBCU Program receives an additional \$85 million appropriation. Funds were initially made available in fiscal years 2008 and 2009 by the College Cost Reduction and Access Act (CCRAA) of 2007 (P.L. 110-84). Availability of these funds was extended until 2019 by

the Student Aid and Fiscal Responsibility Act (SAFRA) of 2009 contained within the Health Care and Education Reconciliation Act of 2010 (P.L. 111-152).

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.

Phase I of the application process requires that HBCUs and HBGIs provide numerical data to determine grant awards according to a Congressionally mandated formula. After submitting the required Phase I data, the HBCU and HBGI applicants are notified of their annual award amount based on the data received, aggregated and calculated from all eligible applicants.

In Phase II, both the HBCUs and the HBGIs submit a detailed project plan which includes legislative allowable activities and measurable objectives designed to strengthen administration, financial management, academic programs, and instructional facilities. Program staff review the institutions' objectives to determine compliance with legislative intent, regulatory requirements, and sound educational principles.

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 collection of information will be 100% electronic, thereby minimizing burden to the fullest extent possible.

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.

Improved reporting and technological capability in the Federal Student Aid Office may make the collection of Pell Grant data available in the future without relying on the institutions to provide this information. At this time, we are unable to obtain the data through channels other than this application.

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.

The collection of information 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.

All eligible HBCUs and HBGIs that seek assistance under this program must submit the required data that will be applied to a formula which calculates individual awards for the universe of HBCUs, HBGIs and professional schools. If this information is not collected or collected less frequently, the programs cannot meet their statutory requirements and cannot make awards.

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.

There are no 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 publish the applicable 30-day Federal Register notice required for public comment. Additionally, annual consultations and reviews have occurred with representatives of the HBCUs and HBGIs regarding the data collection instrument, and instructions provided during annual technical assistance workshops for all grantees, and during individual on-site visits.

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

No payments or gifts are provided.

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

No confidential information is requested. Confidentiality is not assured.

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.

No sensitive or personal information is solicited.

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.

The estimated individual burden hours of this collection of information is 80 hours. We estimate 120 respondents. Applications will be submitted electronically.

Annual Burden Hours:

Phase I – 8 hrs – annually
Phase II – 40 hrs – once every five years

Estimated Individual Average Annual Burden Hours:

Year 1	48
Year 2	8
Year 3	8
Year 4	8

Year 5 8

80 hours per applicant over 5 years

80 divided by 5 years = 16 average annual burden hours per applicant each year.

120 applicants x 16 burden hours = 1,920

1,920 Total average annual burden hours for all applicants.

Of the 120 estimated respondents, 67 are public institutions and 53 are private, non-profit institutions. The total average annual burden hours for public institutions are: 1,072. The total average annual burden hours for private, non-profit institutions are: 848.

Average Estimate of Cost to Applicants:

Professional staff (120 personnel X 12 hours X \$20 per hour) = \$28,800	
Support staff (120 personnel X 4 hours X \$12 per hour) = \$5,760	
Total Professional cost:	\$28,800
Total Support cost:	<u>+\$ 5,760</u>
Total:	\$34,560

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 start-up costs to 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.

Estimated annual cost to the Federal Government	
Development and Approval Process (2 staff x 75 hours x \$35 per hour)	\$5,250
Printing (100 applications x \$1 per app)	\$100
Mailing (40 applications X \$.50 per copy)	\$20
Monitoring of Grants (160 days x 6 staff x 280 hours)	\$268,800
World Wide Web Preparation for Posting (4 hours x 1 staff x \$25 per hour)	\$100
Staff time for generating slate (40 hours x 2 staff x \$35 per hour)	\$2,800
Staff time to review and approve funding recommendation (40 hours x 2 staff x \$45 per hour)	\$3,600

Staff time to generate, approve, and issue grant awards. (40 hours x 2 staff x \$25 per hour)	\$2,000
Annual Monitoring Cost 10 hours per award x 114 awards = 1,140/6= 190 hours per person 6 staff x \$35 x 190 hours= \$39,900 Travel Cost Associated w/ Grant Monitoring \$15,000	\$54,900
Total estimated cost to the Federal Government	\$337,570

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

The Higher Education Opportunity Act of 2008 (P.L. 110-315) increased the number of Historically Black Graduate Institutions (HBGI) or Qualified Graduate Programs (QGP) by six applicants; therefore a program change burden hour increase of 96 has occurred, i.e. 16 average hours times six additional applicants.

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.

The Department does not plan to publish the collected information.

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.

No objections to display of information.

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

There are no exceptions.