

Minority Science and Engineering Improvement Program (MSEIP)



**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
FY 2011-2013**

prepared

December 2010

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**APPLICATION FOR GRANTS UNDER THE Minority Science and Engineering
Improvement Program (MSEIP), CFDA NUMBER 84.120A**

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 Office of Postsecondary Education is requesting reinstatement of this previously approved application which will be needed for the upcoming FY 2011 Minority Science and Engineering Improvement Program (MSEIP) competition that is anticipated to take place in spring of 2011. The previous application was discontinued on May 30, 2009, to allow the Department to review suggestions from prospective applicants and to incorporate and update changes that would clarify information. In FY 2010 we funded down the FY 2009 grant slate because of the significant number of high-quality applications.

The authorizing statute for this program, Title III, Part E, Subpart 1, Sections 350-365 of the Higher Education Act of 1965, as amended, and the governing regulations (34CFR637.1), require the collection of this information to determine the applicant's eligibility.

Minor changes to the application have been made since OMB's last review and approval of the form. The program staff has improved the instructions and the MSEIP Eligibility Form based on the comments and feedback from the field. These clarifications do not require additional data from the applicant.

The collection of the information requested on the proposed application form is necessary to allow 2-year and 4-year, public and private, nonprofit institutions of higher education; nonprofit science-oriented organizations; and professional scientific societies to apply for grant funds under the Minority Science and Engineering Improvement Program (MSEIP).

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 information on the applicant's eligibility form will be collected annually from applicants that desire to apply for new awards under MSEIP.

Without the collection of this information, the Department cannot properly screen applicants that apply for MSEIP grants under Title III, and therefore, cannot award new grants for which Congress has appropriated funds under these programs.

The program staff and peer reviewers will use the information to evaluate applications and make funding decisions.

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 of using information technology to reduce burden.

OPE will use Grants.gov to permit electronic submission of the applications which streamlines the preparation and application process. Improvements to the forms make it easier for applicants to prepare and submit their applications, thereby reducing paperwork burden.

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

The data collected in the application are unique and do not duplicate other data requests from other Department offices.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), 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.

This application will be used by those applicants that desire to apply for new awards under MSEIP. If this information is not collected, grants cannot be awarded in accordance with the guidelines outlined in the Title III, Part E legislation.

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 which 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 tht it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that would require the collection to be conducted in any manner listed above.

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 citation for the 30 day notice will be supplied once it is published in the Federal Register.

We have consulted with persons outside the agency regarding their views on data collection including current grantees and other federal agencies i.e., National Science Foundation. Comments that we received revealed concerns regarding 'what is included in the page count' and streamlining the MSEIP Eligibility Form.

- A. In response to these comments, we revised the 'Instructions for Completing the Application Package' and reorganized the information to match the four parts that the applicant submits information in Grants.gov. We also developed a chart with the headings below for Parts I, II, III, and IV.

PART I	GRANTS.GOV	<u>Included in</u>	Instructions
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	SECTION NAME	<u>the page count?</u>	
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These changes will help the applicant to:

1) identify what has to be completed (i.e., forms and narratives); 2) correctly identify the name of the file located in Grants.Gov that they will need; 3) clearly understand whether the form or narrative is included in the page count; and 4) also understand what section to upload the files or forms in Grants.Gov. As a result of these changes, we expect fewer applicants to go over the page limits.

B. There are four types of eligible applicants:

- 1) 2-year public and private, nonprofit institutions of higher education;
- 2) 4-year public and private, nonprofit institutions of higher education;
- 3) Nonprofit science-oriented organizations; and
- 4) Professional scientific societies.

We modified the MSEIP Eligibility Form by moving the sections together for each of the four type of eligible applicants rather than having them to complete a common section and then locate the unique section that applies to their eligibility.

The applicant must complete all sections of the eligibility form in order for the Department to determine their eligibility status. These minor edits will help to ensure that all sections are completed by the applicant.

The minor modifications to the MSEIP Eligibility Forms for each type of applicant, requires applicants to provide the same information as previously requested but the rearrangement makes it easier for the applicant to understand and complete. Therefore, applicants should make fewer errors when completing these forms.

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

No payment or gifts are provided to respondents.

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

No assurances of confidentiality are provided.

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.

There are no questions of a sensitive nature.

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 13 of OMB Form 83-I.
- 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 not be included in Item 14.

Based on past experiences with the use of the form we estimate that there will be approximately 200 respondents submitting the form annually; we estimate that each respondent would use approximately 40 hours to prepare the form for a total of 8000 hours per application submitted.

We expect approximately 180 responses from public institutions and approximately 20 responses from private institutions. We estimate that the burden for each applicant to be \$8,385. (We estimate the cost for 180 applicants from public institutions to be approximately \$1,509,300.00 and the cost from private institutions to be approximately \$167,700.00.)

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 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 federal costs except for those included in Item 12.

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.

14. Cost to the Federal Government		
A professional staff to develop clearance package (Program Manager)	GS-14 employee: 60 hrs. @\$40 per hr.	\$2400
Overhead cost related to facilities, administration, and other indirect cost plus accrual of leave and fringe benefits	\$2,400 x @ 50% salary	\$1200
Application printing	50 copies x \$1/copy)	\$50
Application mailing	(5 copies X \$.40/item mailed)	\$2
Other Department staff to review and approve the request: GS-15 employee (Director) and GS-14 employee (Team Leader)for final review and approval	GS-15 employee: 10 hours @ \$60 per hr.(\$600) + GS-14 employee 10 hours @\$40 per hr (\$400)+ (Overhead cost: \$1,000 x 50% = \$500)	\$1500
Field Readers	(50 @ \$1,100)	\$55,000
Forms and Web-site development costs		\$4,000
Processing applications by staff	(12 staff x 40 hrs. x \$30 per hr. = \$14,400)+ (Overhead cost: \$14,400 x 50% = \$7,200)	\$21,600
Contractor logistical support for workshops, application processing, field reading and slate preparation		\$30,000
Staff time for conducting supervised review	(2 weeks x 3 control reviews, and 11 panel chairpersons) (12 staff x 120	\$64,800

	hrs. = 1,440 hrs. x \$30 per hr. = \$43,200)+ (Overhead cost: 50%(43,200) = \$21,600	
Staff time for generating slate	(3 staff x \$30 x 40 hrs. = \$3,600)+ (Overhead cost: \$3,600 x 50% = \$1,800)	\$5,400
Staff time to review and approve funding recommendation	(1 staff x 4 hrs. per grant award x 33 awards) (33 awards x 4 hrs. per award x \$30 per hr. = \$3,960)+ (Overhead cost: \$3,960 x 50% = \$1,980)	\$ 5,940
Staff time to generate, approve, and issue grant awards	(6 hrs. per award x 33 awards = 198/12 = 16.5 hr/person 12 staff x \$30 x 16.5 hrs. = \$5,940)+ (Overhead cost: \$5,940x 50% = \$470)	\$8,910
Annual Monitoring Cost	(10 hrs. per award x 33 awards = 330/12 = 27.5 hrs. per person) (12 staff x \$30 = 360 x 27.5 hrs. = \$9,900) + Overhead cost: (9,900x 50% = \$4,950)	\$14,850
	Total Annual Government Estimated Cost	\$215,652

15. Explain the reasons for any program changes or adjustments.

This is a reinstatement with change of a previously approved information collection request. This clearance request is a program change due to an increase of 8,000 hours and 200 responses. The previous submission was discontinued in May 2009.

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 collected information will not be published for statistical purposes.

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 the expiration date for the OMB approval on the form, as required.

18. Explain each exception to the certification statement.

There are no exceptions.