

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

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 Predominantly Black Institutions (PBI) Program is authorized under Title III, Part F of the Higher Education Act of 1965, as amended (HEA). The PBI Program makes grant awards to eligible colleges and universities to support the strengthening of PBIs to carry out programs in the following areas: science, technology, engineering, or mathematics (STEM); health education; internationalization or globalization; teacher preparation; or improving the educational outcomes of African American males. Grants support the establishment or strengthening of such programs that are designed to increase the institutions capacity to prepare students for instruction in the above noted fields. Grants are awarded competitively. This information collection is necessary to comply with Title III, Part F of the HEA.

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 Department will use the data collected in the PBI Application to determine institutional program-specific eligibility, to evaluate the projects submitted by eligible institutions of higher education and to determine allowable multi-year project expenses based on statutory requirements.

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.

The Office of Postsecondary Education is committed to the reduction of paperwork. In FY 2011, applicants will be required to submit their application electronically via Grants.gov.

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.

Since the information submitted in this application is unique to each respondent and to the authorizing legislation, no duplication exists.

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 collection of information does not involve small business 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.

Federal program and policy activities could not be carried out if the information requested in this package is not collected. Collection of the data is necessary in order to meet statutory requirements and make grant awards under this program.

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 included in this information collection.

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.

As required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB, a 30-day Federal Register Notice was published.

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

The Department will not provide 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.

There are no assurances of confidentiality.

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.

Questions of a sensitive nature are not included in this information collection.

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 not be included in Item 14.**

The estimated total reporting burden hours for this data collection is 1400 hours. This includes an estimated total of 40 respondents, each with an estimated response time of 35 hours. It is estimated that this program will run one competition in the next three years.

40 applicants x 35 burden hours = 1400
 1400 total average annual burden hours for all applicants

The average estimated annual costs to respondents are provided below.

Estimated Cost to Respondents:	PBI
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 \$10.	\$210
Operation Cost	
Annual Cost to applicant to file and maintain application materials	\$100
Estimated Total	\$310
Professionals (40 personnel X 25 hours X \$25 per hour)	\$25,000
Clerical (40 personnel X 10 hours X \$15 per hour)	\$6,000
Estimated Cost to Respondents Total	\$31,310

This represents a decrease in the estimated burden hours and costs from the previous clearance package, as the number of respondents was overestimated in the last clearance.

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**

Task	Costs	Hours	Number of Staff	Total Annual Hours	Total Annual Costs
Securing OMB approval once every three years.	\$50/hr	24	1	24	\$1,200
Reports design once every three years.	\$50/hr	15	1	15	\$750
Reviewing applications once every three years.	\$50/hr	100	2	200	\$10,000
Generating/Preparing Slates	\$50/hr	40	1	40	\$2,000
Slate Review and Approval	\$70/hr	5	6	30	\$2,100
Issuance of Awards	\$50/hr	30	2	60	\$3,000
Monitoring and Technical Assistance	\$50/hr	300	2	600	\$30,000
Total Annual Costs					\$49,050

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

There is an adjustment of -3150 total burden hours, with the number of respondents, decreasing from 130 to 90 resulting in a decrease of hour and cost burden.

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 has no plans to publish any information from this collection.

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 expiration date for OMB approval will be displayed.

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

No exceptions are being requested.