Supporting Statement for U.S. Department of Education Research Performance Progress Report (RPPR) OMB Control Number 1850-NEW

1. Explain the circumstances that make the collection of information necessary. Include identification of any legal or administrative requirement that necessitates the collection.

IES is adopting, without change (except for making the "optional" questions mandatory), the RPPR under OMB Control # 4040-0001. This is an existing template for performance reporting that IES is seeking approval to adopt. IES plans to use the Research Performance Progress Report format and instructions with the exception of the "Impact" category that will be used by many IES discretionary grant programs to enable grantees to meet IES deadline dates for submission of performance reports to the Department. This form streamlines reporting requirements and makes them uniform for grantees that receive grants in multiple programs that use the form. It eliminates the necessity of many programs' having to submit to OMB separate clearance requests for program-specific reporting forms.

Recipients of multi-year discretionary grants in these programs must submit interim performance reports, usually annually, for each year funding has been approved in order to receive a continuation award. The interim performance report should demonstrate whether substantial progress has been made toward meeting the approved goals and objectives of the project. IES program office may also require recipients of "forward funded" grants that are awarded funds for their entire multi-year project up-front in a single grant award to submit the RPPR on an interim basis, usually annually. In addition, IES program office will require grantees to use the ED 524B form to submit final performance reports to demonstrate project success, impact and outcomes.

In both the interim and final performance reports, grantees are required to provide data on established performance measures for the grant program (e.g., Government Performance and Results Act measures) and/or on project performance measures that were included in the grantee's approved grant application. The RPPR will contain research and related (total federal and non-federal) budgetary forms that will be used to collect budgetary data from the recipient organization. The information submitted will be used to conduct periodic administrative/budgetary reviews.

Performance reporting requirements are found in 34 CFR 74.51, 75.118, 75.253, 75.590 and 80.40 of the Education Department General Administrative Regulations (EDGAR). ED is requesting a three-year approval of the RPPR.

IES facilitates alignment between IES performance reporting requirements in the RPPR and the information included in the grantee's original application by continuing to require that program offices include program performance measures in both the application package and the application notice (published in the *Federal Register*) for the program, as

a way of informing potential grantees about what data they are expected to collect and report on in regard to their projects. Program offices are also required to include a link in the application package to the electronic version of the performance reporting form (e.g., RPPR) that potential grantees will be required to use, so that applicants have a good idea of the types of data collection around which they should be designing their projects. IES continues to undertake additional outreach efforts to applicants/grantees (e.g., preapplication workshops, manuals, training sessions, webinars) to help them understand the data requirements of the RPPR Format.

2. Indicate how, by whom, how frequently and for what purpose the information is to be used.

As an interim (usually annual) performance report, IES uses the information submitted by grantees in the RPPR to evaluate grantee performance and progress and to determine whether non-competing continuation funds should be awarded in multi-year grants. Only grantees that can demonstrate that they are making substantial progress (or, if not, have submitted an acceptable plan for meeting their objectives in subsequent budget periods) are eligible for continuation funding.

IES will use the information submitted on the ED 524B as a final performance report to determine whether grantees whose projects have ended have achieved project objectives and met or exceeded the Government Performance and Results Act and/or other program performance measures and grant requirements. This determination enables IES to assure that grants can be closed out in compliance.

3. Describe any consideration of information technology use to reduce burden, as well as any technical or legal obstacles for reducing burden.

Grantees may submit both the RPPR (annual performance reports) and ED 524B (final performance reports) electronically through the Department's G5 grant system. There are a number of pre-populated fields and drop-down menus on the electronic ED 524B that eliminates data entry. Further, expandable fields give grantees flexibility to provide the amount and level of detail needed to describe their progress on their program and project performance measures.

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 2 above.

Consistent with EDGAR requirements found in 34 CFR 74.51, 75.118, 75.590, 75.720, and 80.40, the grantee is required to submit interim (usually annual) Research Progress Performance Reports (RPPR) and a final performance report (ED 524B) that describes project performance, substantial progress, and outcomes. Information about project

activities and performance is unique to each funded project and thus is not available anywhere else.

5. If the collection of information has a significant impact on a substantial number of small businesses or other small entities, describe the methods used to minimize burden.

Under EDGAR regulations, all requirements for small entities are minimized.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

EDGAR, 34 CFR Part 75.253, requires that substantial progress toward meeting the objectives in the approved application is a requirement for a grantee's receiving continuation funds. The RPPR will be used on an interim (usually annual) basis as one of the primary monitoring tools for determining whether grantees have made substantial progress.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

The information will not be collected in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

8. Describe any effort to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported.

We will publish a 30-day Federal Register notice inviting public comment.

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

There are no payments or gifts to respondents other than the allocation of federal funds that result from the information collection.

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

ED is not requesting any confidential information in this collection; therefore no assurances of confidentiality are required.

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.

This information collection does not include information of a sensitive nature.

12. Provide estimates of hour burden of the collection of information and analyzed costs to the respondents.

<u>Total Annual Burden Hour Calculation for the Research Performance Progress Report,</u> RPPR: total annual burden hours

IES estimates that over the next three years, approximately 766 respondents each year will be required to use the RPPR, as an interim (usually annual) (estimate based on actual usage in FY 2009 and planned usage in the next two years by additional IES discretionary grant programs). Approximately 133 noncompeting continuation grantees will use this form as an interim (usually annual) performance report. The annual burden hours per response is estimated to average 13 hours for *interim* performance reports and reflects the estimated time grantees spend reporting on project progress and performance and addressing administrative requirements.

Annual Burden Hour Calculations for the RPPR:

Burden Hours for RPPR when Used as an Annual Performance Report: 13 hours/response X 766 responses/year = 9,958 total annual burden hours.

<u>Total Annual Cost Burden to Respondents for the Research Performance Progress Report, RPPR</u>

9,958 total burden hours x \$25/hour = \$248,950

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

No start-up costs.

14. Provide estimates of annualized cost to the Federal Government.

<u>Total Annual Cost to the Federal Government for Research Performance Progress Report,</u> **RPPR:** \$94,815

The total annual cost is based on the following:

RPPR as Annual Performance Report: 3 hours per response x 766 responses x \$41.26/ hour (GS-12 hourly rate) = \$94,815

15. Explain reasons for change in burden, including the need for any increase.

The information collection is a new collection. There are no start-up costs.

The total burden hours for the 1850-NEW collection will be 9,958 hours. Based on projected program usage of the RPPR for FY 2011 and the following two fiscal years, we are requesting 9,958 total annual burden hours for the RPPR.

16. For collections of information whose results are planned to 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.

No plans exist to publish the results of this information collection.

17. Seeking approval not to display the expiration date for OMB approval of this information collection.

We are not seeking approval to not display the expiration date for this information collection.

18. Explain each exception to the certification statement identified in Item 19.

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods.

The results of this information collection will not be published for statistical purposes.