

Annual Performance Report for Grants under the
Talent Search and Educational Opportunity Centers
Programs

***Supporting Statement for Request for Approval under
the Paperwork Reduction Act and 5 CFR 1320***

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 Department of Education (Department) is requesting approval of an extension of the current Talent Search and Educational Opportunity Centers Annual Performance Report (APR) which will expire on October 31, 2011 (OMB No. 1840-0561) to collect Fiscal Year (FY) 2010-11 performance data in late fall 2011 under the Talent Search (TS) and Educational Opportunity Centers (EOC) programs.

Approval will allow the Department to collect consistent performance data from all of the grantees funded during the fiscal year (FY) 2006 grant award cycle and the last year of the extended grant award period from current TS and EOC grantees, who were given a one-time, one-year extension due to the negotiated rulemaking process.

The TS and EOC programs are Student Service programs that provide Federal financial assistance in the form of discretionary grants to (a) institutions of higher education; (b) public and private agencies and organizations including community-based organizations with experience in serving disadvantaged youth; (c) combinations of such institutions, agencies and organizations; and, as appropriate to the purposes of the program, (d) secondary schools. The specific goal of the TS and EOC programs is to help youth and adults from disadvantaged backgrounds complete secondary education and enroll in programs of postsecondary education (20 U.S.C. 1070a-12 and 1070a-16).

The information that grantees submit in the performance report allows Student Service to annually assess each grantee's progress in meeting the project's approved goals and objectives. The performance report data are compared with the project's approved objectives to determine the project's accomplishments, to make decisions regarding whether funding should be continued, and to award "prior experience" points. The regulations for these programs provide for awarding up to 15 points for prior experience (34 CR 643.22 for TS; 644.22 for

EOC). During a competition for new grant awards, the prior experience points are added to the average of the field reader scores to arrive at a total score for each application. Funding recommendations and decisions are primarily based on the rank order of applications on the slate; therefore, assessment of prior experience points, based on data in the annual performance report, is a crucial part of the overall application process.

Further, this performance report form is the main source of data for the Department's response to the requirements of the Government Performance and Results Act (GPRA) for these two programs.

The Department collects information from TS and EOC grantees under the authority of Title IV, Part A, Subpart 2, Chapter 1, Section 402B and F of the Higher Education Act of 1965, as amended, the program regulations in 34 CFR 643 and 644, and the Education Department General Administrative Regulations (EDGAR), in 34 CFR 74.51, 75.720, and 75.732. Attached is a copy of the authorizing statute, as amended in 1998, which is the basis for the current program regulations, also attached.

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 uses the data collected to (a) evaluate projects' accomplishments; (b) determine the number of prior experience points to be awarded to current grantees; and (c) aid in compliance monitoring (i.e., to determine whether grantees are in compliance with the selection requirements for project participants [34 CFR 643.3 and 644.3]).

In addition, Student Service uses the annual performance reports to produce program-level data for annual reporting, budget submissions to OMB, Congressional hearings and inquiries, and responding to inquiries from higher education interest groups and the general public.

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 data collection method allows the grantees to use computerized data systems to collect, retrieve, and report the requested information. A Web-based software application has been developed for grantees to enter the data online and submit the entire report via the Internet. The TS and EOC projects have been submitting the annual performance report via the Internet for the past five years. For project year 2009-10, 100% of the current grantees submitted via the Internet.

The data collected are summary information, not data on individual participants; thus the reports are a low-level security risk. Nonetheless, the Web site is secured to ensure that the data are seen only by authorized individuals and are protected from network hackers. Further, online data edits are in place to ensure the accuracy and integrity of the data submitted.

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.

Since the information grantees submit in their performance reports is unique to each project and is not collected elsewhere, no duplication exists. No other instrument is available to collect the information that the program needs to assess prior experience or program outcomes. The data collected in the annual performance reports are fundamental to these programs.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection does not affect 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.

The collection of performance reports is required annually. Collection of information on a less frequent basis is not feasible. These reports are used to determine if the grantee is making satisfactory progress in meeting the goals and objectives proposed in its initial application. In addition, the information is needed to award prior experience points to grantees. Without this data collection, Student Service will be unable to use the data to assess the prior experience provision of the authorizing statute, respond to the GPRA, PART, and efficiency measures requirements, or develop improved policies for program administration.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

This information collection is conducted in a manner consistent with 5 CFR 1320.5(d)(2).

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.

Since this information collection was last approved, Student Service staff members have attended a number of state, regional, and national meetings at which the Department solicited informal views and comments on reporting requirements from grantees and other interested persons. Grantees are also encouraged to comment during the announced public comment periods. This process will be followed again prior to the submission of the new annual Performance Reports for Talent Search and Educational Opportunity Centers programs. A 60 day notice was published on April 18, 2011, Vol. 76 Page 21714. One public comment was received. The change was addressed in the updated Annual Performance Report and instructions. A 30-day Federal Register notice was published in the Federal Register to solicit public comments.

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

The Department will not provide payment 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.

No assurances of confidentiality are provided to the respondents.

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.

The performance report form does not include questions about sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered sensitive and private.

Total estimated cost to respondents

\$120,094

Note: As many of the respondents are project staff whose salaries are largely financed with Federal grant funds, the Department believes that the actual cost to respondents is lower than those indicated above but cannot provide an accurate estimate at this time.

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 other costs to the respondents associated with this information collection. Grantees are required by program regulations to collect and maintain this information. The costs to transmit the data electronically via the Web are customary and usual business practices.

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.

The largest portion of the Government's cost is borne directly by the Department of Education in designing the report form, securing clearance of the form, and collecting, aggregating, and disseminating the information.

Posting performance report application to World Wide Web	120
<i>\$40 per hour x 2 hours</i>	80
<i>Overhead costs</i>	40
Annual updates to Web application, Web site hosting, help desk, and data processing (contractor's costs)	70,000
Analyses of data and preparation of national summary reports and individual project data (contractor's costs)	90,000
Professional staff to review and edit reports for dissemination	2,400
<i>\$40 per hour x 40 hours</i>	1,600
<i>Overhead costs</i>	800
Printing and mailing of reports	10,500
TOTAL FEDERAL COST	\$173,020

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

There are no changes in the current burden hours. The total estimated annual burden is 3,576 hours and 596 responses. Burden and responses have been disaggregated in this submission.

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.

Collected information will be analyzed annually to determine if each grantee is meeting its approved goals and objectives and to award prior experience points. Performance measures and efficiency measures for the two programs, based on data conveyed in grantees' annual performance reports, are disseminated in the Department's Annual Program Performance Plan. In addition, the Department's Web site provides data on performance and efficiency measures, beginning with

the 2006–07 performance period, *at the grantee level*; this more detailed reporting has been made possible due to improvements in accuracy resulting from incorporating the standard objectives into the report form.

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.

This report form and the Web site will display the expiration date for OMB's approval of the information collection.

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

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.