

**Upward Bound Programs: Upward Bound, Upward Bound Math-Science, and
Veterans Upward Bound**
Request for Approval under the Paperwork Reduction Act and 5 CFR 1320
**Supporting Statement for the Upward Bound Programs' Annual Performance
Report**

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 Upward Bound Program (UB) Annual Performance Report (APR) which will expire on July 31, 2011(OMB No. 1840-0762) to collect data under the UB programs.

Approval will allow the Department to collect consistent performance data from current UB grantees, which were given a one-time, one-year extension due to the delay of the fiscal year (FY) 2011 UB competition until FY 2012. The delay of the competition was necessitated by the negotiated rulemaking process which was conducted to implement the Higher Education Opportunity Act (HEOA) revisions to the Higher Education Act (HEA), the authorizing statute for the programs. Beginning next year, a new package will be submitted which will include new data collection fields consistent with the changes made by the HEOA. The approval would also allow the Department to conduct an assessment of prior experience which is necessary for completing the award's process for the new (FY) 2012 Upward Bound competition.

The Upward Bound programs are part of the Student Service programs that provide federal financial assistance in the form of discretionary grants to institutions of higher education, public and private agencies and organizations including community-based organizations with experience in serving disadvantaged youth, combinations of such institutions, agencies and organizations, and as appropriate to the purposes of the program, secondary schools, for the purpose of increasing participation and completion rates of low-income and first-generation college students in the academic pipeline. The goal of the Upward Bound programs is to increase the academic preparedness and motivation of low-income individuals (both youth and veterans) who are potentially first-generation college students so as to help them complete their secondary education, enroll in programs of postsecondary education, and successfully complete those programs (20 U.S.C. 1070a-13).

The information that grantees submit in the performance report is used to assign prior experience points. The Upward Bound program authorizing statute, Title IV, Part A, Subpart 2, Chapter 1, Section 402A(c)(2)(C) of the Higher Education Act of 1965, as amended, states that "in making grants under this chapter, the Secretary shall consider

each applicant's prior experience of high quality service delivery...under the particular program for which funds are sought." The current Upward Bound program regulations at 34 CFR 645.32 provide for the awarding of up to 15 points for prior experience (PE). The data provided in the APR are compared with the project's approved objectives to determine the project's accomplishments and to award PE points. During a competition for new grant awards, the PE points are added to the average of the field reader scores to arrive at a total score for each application. A slate of all applicants is developed on the basis of the total scores of the applications. 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 for this program to the requirements of the Government Performance and Results Act (GPRA). In the Department's FY 2010 Annual Program Performance Plan, the program goal for the Upward Bound program is to "Increase the percentage of low-income, first-generation college students who successfully pursue postsecondary education opportunities."

The Department collects information from the Upward Bound program grantees under the authority of Title IV, Sections 402A(c)(2) and 402C of the Higher Education Act of 1965, as amended, the program regulations in 34 CFR 645, 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 PE points to be awarded to current grantees, and (c) aid in compliance monitoring (e.g., to determine whether grantees are in compliance with the selection requirements for project participants [34 CFR 645.3]).

In addition, the annual performance reports are used 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. Without this data collection, the Student Service programs would be unable to comply with the PE component of the law and to respond to GPRA 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 given to using technology to reduce burden.

The annual performance report is designed to allow grantees to use computerized data systems to collect, retrieve, and report the requested information. Since 2001, grantees of the Upward Bound programs have used collected data in computerized data systems and have submitted that data via a Web-based software application that allowed them to enter data online and submit the report via the Web.

Since the data that will be submitted contain confidential information on participants, the secured Web site meets the Department's data security standards for sensitive data, including improved password and site access procedures. Further, to ensure that the data are accessible only to authorized individuals and protected from unauthorized uses, a grantee must submit the participant level data via the Web application.

After completing the entire report on the Web, the grantee is instructed to print a copy of the completed report form. Section I of the printed report form includes signature lines for the project director and the certifying official for the grantee institution. The grantee must submit, via fax, a signed copy of Section I of the report form to certify that the information submitted electronically is accurate, complete, and readily verifiable.

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.

The information grantees submit in their performance reports is unique to each project, no duplication exists. No other instrument is available to collect the information that the program needs to assess PE or program outcomes. The data collected in the annual performance reports are fundamental to the program.

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.

As indicated above, if the information were not collected, the Department would be unable to assess grantees' performance, to follow regulations governing award of new grants, and to report on each program as a whole. In addition, the information is needed to award PE points to grantees. Without this data collection, Student Service will be unable to comply with the PE provision of the authorizing statute, respond to the GPRA requirements, nor develop improved policies for program administration.

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

With one exception, no information will be collected in the manner covered under any of the special circumstances outlined. The exception is that respondents are required to retain participant records for more than three years as required under 34 CFR 74.53(b). In order to assess the impact of the program services on participating students' academic progress, and in anticipation of the new outcome measure for UB which occurred as a result of the HEOA, grantees should track the academic progress of all prior-year participants beginning with the 2008 high school graduating cohort, until postsecondary completion.

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 Report for the Upward Bound program. The Department will publish both a 60-day and 30-day Federal Register notice to solicit public comment.

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

The Department of Education 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.

The Department of Education's disclosure policies adhere to the provisions of the Privacy Act of 1974 (P.L. 93-579, 5 U.S.C. 552a) and Title IV of the Higher Education Act of 1965, as amended (P.L. 102-325, Sec. 402C). The Department receives and maintains personal information on participants in the Upward Bound programs. The principal purpose for collecting this information is to administer the program, including tracking and evaluating participant progress. Providing the information on the form, including a social security number is voluntary; failure to disclose a SSN will not result in the denial of any right, benefit or privilege to which the participant is entitled.

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 items that are commonly considered sensitive and private.

12. Provide estimates of the hour burden of the collection of information. The statement should :

- Indicate the number of respondents by affected public type (federal government, individuals or households, private sector, business or other for profit, not-for-profit institutions, farms state, local or tribal government), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping,

reporting or third party disclosure. 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.

Estimated burden hours for this collection of information are 10,287 hours. We estimate approximately 1,143 respondents (971 Upward Bound, and 172 Upward Bound Math-Science and Veterans Upward Bound). The performance reports are submitted annually.

Affected Respondents:

Public	848
Private Sector	295
Total Affected Respondents	1,143
Estimated number of respondents	1,143
Estimated preparation time	9 hours (971 UB, 172 UBMS & VUB)
Public	7,632 hours
Private Sector	2,655 hours
Total estimated burden hours	10,287 hours

Estimated annualized cost to respondents: Most of the costs of this data collection are those of the Federal government, since the respondents are project staff paid for the most part with Federal grant funds. Nonetheless, the annual cost to the grantee to respond to this data collection is estimated as follows:

Professional staff (1,143 respondents X 8 hours @ \$37 per hour)	\$338,328
Clerical staff (1,143 clerical staff members X 0.5 hours @ \$19 per hour)	\$10,859

Total estimated cost to respondents

\$349,187

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.

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 costs to the Federal government

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

Professional staff to update report form and prepare clearance package:

\$55 per hour X 80 hours	\$4,400
Overhead costs (facilities, administration, accrual of leave, and fringe benefits; estimated at 50% of salary)	2,200

Clerical staff to type, route, and copy report form:

\$19 per hour X 15 hours	285
Overhead costs (50% of salary)	143

Other Department staff to review and approve the request:

\$65 per hour X 10 hours	650
Overhead costs (50% of salary)	325

OMB review (estimated):

\$45 per hour X 8 hours	360
Overhead costs (50% of salary)	180

Posting performance report application to World Wide Web:

\$55 per hour X 2 hours	110
Overhead costs (50% of salary)	55

Annual updates to web application, Web site hosting, help desk, and data processing (contractor's costs)*	207,000
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Analyses of data, calculation of PE points, and preparation of national summary reports and Individual project data, etc. (contractor's costs)

414,000

Professional staff to review and edit reports for dissemination:

\$55 per hour X 40 hours	2,200
Overhead costs (50% of salary)	1,100
Printing and mailing of reports	<u>10,500</u>
Total	\$643,508

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion) and include both changes in burden hours and changes in cost burden.

This is an extension of a currently approved information collection. An increase in the number of burden hours from the current inventory of 9,704 to 10,287 was due to the disaggregation of burden from the previous collection. There are 1,143 responses.

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 program, based on data conveyed in grantees' annual performance reports, are disseminated in the Department's Annual Program Performance Plan.

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 Submissions".

There are no exceptions.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.