

SUPPORTING STATEMENT/JUSTIFICATION

A. JUSTIFICATION

1. *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.*

Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP), created in the Higher Education Amendments of 1998 (Title IV, Section 404A-404H), is designed to raise educational expectations and strengthen preparation for college for low-income middle grade and secondary school students through competitively awarded grants to state projects and local partnerships. Grantees (states and local partnerships) provide services including tutoring, mentoring, academic enrichment, student and family support, dissemination of information to students and their parents about postsecondary education and options for financing college, and financial assistance.

The regulations governing the Gaining Early Awareness and Readiness for Undergraduate Programs are 34 CFR Part 694. The Education Department General Administrative Regulations (EDGAR) requires grantees to submit performance reports annually [see 34 CFR Part 74.51, 34 CFR Part 75, Section 75.118 and 75.720].

Under the Government Performance and Results ACT (GPRA), the U.S. Department of Education (ED) is required to establish performance indicators demonstrating to Congress whether progress is being made in achieving the goals of its programs. A primary purpose of the Annual Performance Report is to collect the student outcome, program implementation, and other information required to report on the Performance Indicators established for GEAR UP. The performance report is also designed to provide ED program officers, who are responsible for making annual decisions about whether continued funding should be provided to individual GEAR UP grantees, with the information needed to make these decisions. Accordingly, the performance report also collects basic information on budgetary expenditures (federal dollars and nonfederal matching contribution), program structure, participants in GEAR UP, and comparisons of annual measurable outcomes to annual objective.

The current Annual Performance Report, or APR OMB #1840-0777, expires on February 28, 2010. The Department of Education is seeking an extension of its APR for dissemination to grantees.

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 Annual Performance Report is completed by each GEAR UP grantee on an annual basis. The Federal Government uses the information to report progress in meeting the performance objectives of GEAR UP. In addition, this information is the basis for determining that substantial progress has been made, allowing the program office to process continuation awards.

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 Annual Performance Report is posted the Department of Education GEAR UP website, <http://www.ed.gov/programs/gearup/index.html> reporting. The GEAR UP program also utilizes an electronic version of the currently approved performance data collection instrument, which is accessed online by grantees. Currently, 100% of these reports are completed online and submitted electronically. The site is open for a period of thirty days prior to the due date and ninety days following the due date. Grantees access the report by entering their unique ID and password. They can save their report by sections and submit the report to ED once completed. There are also edit checks on numbers served and automatic totaling of budget information to avoid typographical and computational errors. These changes prevent submission of incomplete and erroneous reports. Hard copies of the APR report are printed from the web-based application and placed in the official file.

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.*

GEAR UP's Annual Performance Report is the primary method to collect the overall programmatic and fiscal information. The information submitted is specific to the GEAR UP program, there is no duplication. There is no other data collection instrument available that is critical to meet the purposes described in Item 2 above.

5. *If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.*

We continue to anticipate that no small entities will be required to complete this annual performance report. The collection of this information has no impact on 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.*

In accordance with EDGAR, 34 CFR §75.590, each eligible recipient that is awarded a GEAR UP grant must submit an APR describing its progress in meeting project goals and objectives. As required by GPRA, the APR is also used to collect data addressing the performance of the GEAR UP program on a national level.

It is critical for GEAR UP grantees to complete their performance report annually so that ED can review and use the reports as a means to make decisions about continued annual funding to individual grantees. Additionally, performance reporting on a schedule other than annual would be extremely difficult to carry out, as data on participant cohorts (i.e., students in a particular grade level) would need to be accurately merged, and information specific to a particular grade level) would need to be accurately merged, and information specific to a particular year of a GEAR UP project, especially student outcomes, could be lost. In addition, information collected less frequently would not allow ED staff to provide early assistance to projects.

If the recipient doesn't respond to the ED staff person's follow up efforts, by submitting a final report that reflects compliance with the applicable Department regulations and all other terms and conditions of the grant award, and/or making substantial progress in achieving the overall program goals and project objectives, then the ED official must issue a noncompliance letter to the grant recipient.

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

There are no special circumstances associated with this data collection. This information collection will be conducted in a manner consistent with established guidelines.

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.

We will publish the appropriate Federal Register Notices to allow for public comment.

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.*

The Annual Performance Report data will not be confidential. The report does not collect data in which individual students can be identified.

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 questions are not 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 83-1.*
- *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.*

Number of Respondents	Frequency of Response	Hours	Total Burden Hours
209	Annually	40	8,360

Number of Respondents	Frequency of Response	Hours	Total Burden Hours	Wage	Total Cost
209	Annually	40	8,360	\$ 30/hour	\$250,800

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 : \$.00

Total Annual Costs (O&M) : .00

Total Annualized Costs Requested : \$.00

The only costs would be for 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.

Activities/Task	Cost	Hours	Number	Total Cost to Fed. Govt.
APR Revisions/Form Design for 1 year	\$45/hr	40		\$1,800
Securing OMB approval for 1 year	\$45/hr	40		\$1,800
GEAR UP staff reviewing APRs	\$45/hr	4 hrs/FPR	209	\$37,620
Technical assistance to grantees (pre and post APR Report)	\$45/hr	1 hrs/FPR	209	\$9,405
GEAR UP staff processing APRs in GAPS and completing other GPOS requirements	\$45/hr	40 hours	209	\$1,800
Preparing and issuing Notifications of APR to grantees and certifying/authorizing representatives	\$45/hr	60 hours	209	\$2,700
Conduct data analysis for GPRA report	\$88/hr	24		\$2,112

Additional data collection and preparation of coded information	\$45/hr	1 hr/FPR	209	\$9,405
Totals				\$66,222

15. *Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.*

The change in burden hours is due to a decrease in the number of GEAR UP grantees, from 328 in FY 2006 to 209 in FY 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.*

The U.S. Department of Education does not plan 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 U.S. Department of Education will display the expiration date for the OMB approval for this data collection.

18. *Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.*

No exceptions are being requested for this information collection.