

U.S. Department of Education

College Assistance Migrant Program (CAMP)

*Office of Management and Budget
Clearance Package Supporting Statement
And Data Collection Instrument*

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APPENDIX A: AUTHORIZING LEGISLATION

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A. JUSTIFICATION

A1. 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 the information.

The College Assistance Migrant Program (CAMP) office staff collects information for the CAMP Annual Performance Report (APR) the data being collected is in compliance with Higher Education Act of 1965, as amended, Title IV, Sec. 418A; 20 U.S.C. 1070d-2 (special programs for students whose families are engaged in migrant and seasonal farmwork) (shown in appendix A), the Government Performance Results Act (GPRA) of 1993, Section 4 (1115) (shown in appendix B), and the Education Department General Administrative Regulations (EDGAR), 34 CFR 75.253. EDGAR states that recipients of multi-year discretionary grants must submit an APR demonstrating that substantial progress has been made towards meeting the approved objectives of the project. In addition, EDGAR requires discretionary grantees to report on their progress toward meeting the performance measures established for the ED grant program.

The CAMP office staff requests a customized APR that goes beyond the generic 524B APR to facilitate the collection of more standardized and comprehensive data to inform GPRA, to improve the overall quality of data collected, and to increase the quality of data that can be used to inform policy decisions.

A2. Indicate how, by whom, and for what purpose the information will be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The CAMP office staff will collect information via the APR submitted by CAMP grantees in compliance with GPRA 1993 section 4, sub-section 1115. APRs are submitted once a year and are used to monitor grantee progress. We request a customized APR that goes beyond the generic 524B APR to facilitate the collection of more standardized and comprehensive data to inform GPRA, to improve the overall quality of data collected, and to increase the quality of data that can be used for evaluation and to inform policy decisions.

Using the information collected in the APR, the OME has been able to develop decision rules to measure whether or not grantees were making substantial progress from year to year. The grantees that OME determined had not made substantial progress were then required to submit a corrective action plan, which included benchmarks for improving their program performance. As a result of this kind of evaluation, the OME was able to objectively decide to discontinue the funding for grantees who had habitually failed to make substantial progress in accordance with the national performance measures for GED attainment and placement, despite the OME's provision of technical assistance.

With regard to information quality, OMB (2002) identified the following general guidelines for ensuring information quality¹:

- 1) Soliciting input from a variety of sources and perspectives and
- 2) Subjecting draft materials to a review process as well as the following steps to assure information objectivity and utility:
 - a. Preparing a draft of the document after consulting the necessary parties, including government and non-government sources, as appropriate;
 - b. Determining/assuring accuracy and completeness of data sources;

¹ http://www.whitehouse.gov/omb/inforeg/iqg_oct2002.pdf

- c. Determining the expected uses by the government and public;
- d. Determining necessary clearance points;
- e. Determining where the final decision should be made;
- f. Determining whether peer review would be appropriate and, if necessary, coordinating such review;
- g. Obtaining clearances; and
- h. Overcoming delays and, if necessary, presenting the matter to higher authority.

Further, OMB stipulated data integrity as a measure of information quality and recommended adequate hardware, software, and operational support to ensure data is not compromised.

As it pertains to data a) collected from grantees in response to GPRA 1993 requirements and b) made public, either in original form or as documentation supporting other program reports, the CAMP office will follow the recommended steps outlined above, to the extent practicable under circumstances at the time. Further, the program and its grantees will receive technical assistance through the ED's Data Quality Initiative to ensure data and analyses meet high technical standards and expectations.

A3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

The APR form will be collected via an online form accessible only to grantees. This may improve the timeliness of submission, accuracy of data, and reduce cost or burden associated with regular mail or email. It will also reduce the CAMP office's cost associated with data analysis. All information collected in support of the APR will be collected in compliance with grantee evaluation requirements.

A4. 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.

There is no duplication of reporting on the CAMP APR. Data are reported annually covering the specified reporting period. The information requested on the APR from CAMP grantees is not collected or reported elsewhere.

A5. If the collection of information involves small businesses or other small entities, describe any methods used to minimize burden.

The data collection does not involve small businesses or other small entities.

A6. Describe the consequences to the 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 APR is a requirement of funded CAMP projects, as stipulated in GPRA 1993, Section 4. Annual reporting ensures each grantee is:

- implementing project activities as described in their grant proposal and funding agreement;
- reducing waste and inefficiencies through the collection, analysis and use of formative information;
- contributing to desired progress on program indicators.

Less frequent or no annual reporting risks waste, inefficiency and/or lack of progress on desired indicators due to insufficient oversight. In addition, the CAMP's most recent PART rating was "Results

Not Demonstrated,” and ED would like to use data from the customized APR to improve that rating.

A7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstance that would require the collection to be conducted in a manner inconsistent with OMB guidelines.

A8. 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 comment on the information collection prior to submission to OMB. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those 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 instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The Department published both a 60-day and 30-day Federal Register with no public comments.

A9. Explain any decision to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

There are no payments or gifts to grantees in support of the data collection.

A10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

There are no assurances of confidentiality to grantees.

A11. 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.

There are no questions of a sensitive nature on the APR.

A12. Provide an estimate in hours of the burden of the collection of information.

We anticipate a burden of approximately 40 hours per grantee. With 37 grantees, that would be a total of about 1, 184 hours. Using a cost estimate of \$40 per hour, the cost burden per grantee would be about \$1,600, or a total for all 37 grantees of about \$59,200.

A13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in items #12 and #14).

There are no additional costs to respondents or record-keepers resulting from the collection other than already reported in A12 and A14, including capital or start-up costs, or operation, maintenance, or purchase of services.

A14. Provide estimates of annualized cost to the Federal government.

The College Assistance Migrant Program (CAMP) office staff will conduct the data collection for the APR. There are currently 37 CAMP grantees. Assuming that the response for each grantee takes an average of about one hour of CAMP office staff time, and that each hour of CAMP office staff time (including overhead) costs the federal government \$45.05 (grade 13, step 5), the annualized federal cost will be \$1,666.85

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

There are no program changes or adjustments to this IC request.

A16. For collections whose results will be published, outline the plans for tabulation and publication.

The CAMP office staff will publish findings from aggregated grantee reports, as they pertain to the evaluation questions stated in the APR for program and grantee use in better understanding effective service models and strategies. The CAMP office will follow OMB recommended steps (outlined above) to ensure information quality. Following this, the CAMP office will engage in peer review by Education Department colleagues as well as experts in the field for any publication of analyses resulting from APRs.

A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

The OMB number and expiration date will be displayed on the data collection form.

A18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Data collection does not employ statistical methods.