

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

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 hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section¹. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

The Department of Education (Department) is requesting approval for the revision of the Child Care Access Means Parents in School (CCAMPIS) annual performance report form (APR) (OMB No.: 1840-0763) for a period of three years. The currently approved form expires on March 31, 2012. The revised APR conforms more closely to the Office of Management and Budget (OMB) mandates to (more) specifically report program results demonstrated. The revised form collects more specific data aggregated to provide national information on project participants and results demonstrated by CCAMPIS program outcomes. The CCAMPIS annual performance reporting is required by the Higher Education Opportunity Act of 2008 (P.L. 110-315), which amended and reauthorized the Higher Education Act (HEA) of 1965.

The CCAMPIS Program provides grants to institutions of higher education to assist the institutions in providing campus-based child care services to low-income students. In accordance with SEC. 410. CHILD CARE ACCESS MEANS PARENTS IN SCHOOL, Title IV, Part A, Subpart 7, Sec. 419N; § e(1) (A) of the amended HEA and the Education Department General Administrative Regulations (EDGAR), § 80.40, Monitoring and reporting program performance, specifies an annual reporting period for CCAMPIS grantees. The Department will use the collected information to make decisions on whether to issue non-competing continuation grants to funded grantees under the CCAMPIS Program.

¹ Please limit pasted text to no longer than 3 paragraphs.

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 form requests childcare accreditation data as well as information on students whose children are served by the CCAMPIS program. This data is used to determine progress in student enrollment, persistence, and graduation based on the authorizing legislation and EDGAR. Failure to collect this information would prevent the awarding of appropriated funds since essential information would not be available to determine substantial progress of the grantees in the non-competing continuation phase of the program.

In addition, the performance reports are used for the purposes of budget submissions to OMB; Congressional hearing testimonials; Congressional inquiries; performance measuring; 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 Department has established a Word and Excel fillable format for the reports that can be submitted electronically via e-mail. Optionally, grantees without electronic capability may submit via standard mail. The CCAMPIS grantees have been electronically submitting the performance reports via e-mail and optionally via standard mail for the past few years. Collected data summarizes project participant and service information and poses a low-level security risk. No personal identification or sensitive data is requested or required and this eliminates the potential risk of exposure of such information in electronically mailed or standardly mailed reports.

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 submitted in the report is unique to each respondent, no duplication exists as far as can be determined. No other collection instrument is available to collect the information that is being requested.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction,

which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

This information collection does not involve 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 reporting is mandated annually. Collection of information on a less frequent basis would violate the authorizing statute of the HEOA Section 419N (e). These reports are used to determine if the grantees are making satisfactory progress in meeting the goals and objectives as proposed in their initial applications. This data collection also provides the CCAMPIS Program with information on efficiency measures requirements and information to 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, 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 that 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.

No information will be collected in the manner covered under any of the special circumstances outlined.

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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.

The Department will solicit comments on this information collection in the Federal Register pursuant to 5CFR#1320.8(d) after submitting the collection to OMB. Summaries of report responses will be shared with OMB. In addition, CCAMPIS Program staff frequently monitor the small number of currently funded projects via telephone, at technical assistance workshops and national meetings, to provide opportunities for CCAMPIS project directors to recommend changes to the form.

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

The Department does not provide any payments 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. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.² If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

² Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

The Department's disclosure policies adhere to the provisions of the Privacy Act.

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 – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), 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. All narrative should be included in item 12. 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 the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)
- 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.

In an effort to meet the Office of Management and Budget (OMB) mandates to provide enhanced results demonstrated information for this program, the estimated report burden hours have increased from 6 to 7 hours per respondent. Therefore, the estimated burden hours for this collection of information are 7 hours per 153 respondents or 1,071 total burden hours. Burden hours are shown for the total number of estimated respondents for the APR.

We estimate approximately 153 respondents x 1 report each for the year 2011-12 APR:

Estimated number of respondents projected at level funding for the Fiscal Year 2011 program APR: 153 grantees

Estimated number of respondents	153
Estimated preparation time	7 hrs
Total estimated burden hours	1,071

(Estimated Burden: 7 hours Total -- Number of hours of preparation time times by the total number of respondents equals estimated burden hours.)

Most of the costs of this data collection are borne by the Federal Government. The annual cost to the grantee to respond to this data collection is estimated as follows:

Estimated annual costs to respondents:

Professional (153 personnel X 7.0 hours @ \$35 per hour)	\$37,485
Clerical (153 clerical X 2 hours @ \$18 per hour)	<u>5,508</u>
Total estimated costs to respondents	\$42,993

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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12

Total Annualized Capital/Startup Cost :
Total Annual Costs (O&M) :
Total Annualized Costs Requested :

There are no other costs to the respondents. EDGAR regulations require grantees to collect and maintain this information.

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 in collecting, aggregating and disseminating the information.

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 cost to the Federal Government	
Professional staff to develop clearance package (GS-13/14 employee) 40 hrs @ \$50.00 per hour	\$2,000.00
Overhead cost related to facilities, administration, and other indirect cost plus accrual of leave and fringe benefits @ 50% of salary of \$2,000	\$1,000.00
<i>Clerical staff to type, route, and copy report form</i> \$20 per hour X 5 hours Overhead costs: \$100 X 50 percent of salary	\$100.00 \$50.00
Other Department staff to review and approve the request: (GS 15 employee) \$75 per hour X 8 hours = \$600.00 (GS 13/14 employee) \$50 per hour X 20 hours = \$1,000.00 Overhead costs: \$1,600.00 X 50 percent = \$800.00	\$2,400.00
Other Administrative Costs	
Posting annual performance report to World Wide Web (2 hours X 1 staff @ \$40 per hour)	\$80.00
Professional staff to review and edit reports for dissemination \$50 per hour X 40 hours = \$2,000.00 Overhead costs: \$2,000.00 X 50 percent \$1,000	\$2,000.00 \$1,000.00
Total Annual Government Cost	\$8,630.00

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), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

The total 21-burden increase (7 hours per respondent) is a program change due to additional queries have been added to the APR that capture more specific data needed to enhance the understanding of results demonstrated by this program in accordance with OMB mandates. Twenty grantees have completed their awards/grant cycles and two (2) grantees relinquished their awards/grants to the Department resulting in 153 total respondents; therefore, this is an adjustment of respondents.

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 aggregated report data includes the following types of information: (1) project participants' demographics; (2) description of project services; and (3) project outcomes (i.e., postsecondary enrollment, persistence and graduation). The purpose of these reports is to comply with statutory requirements and goals and to, share national information on the CCAMPIS Program with project staff and the larger education community.

The Department's Planning and Evaluation Service, may also use the data collected to supplement other data collection efforts relative to the CCAMPIS Program.

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 Department will display on the form the expiration date for the OMB approval as required.

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

There are no exceptions to the certification statement.

Attachment: Authorizing Statute