

**Veterans Upward Bound Program
Request for Approval under the Paperwork Reduction Act
Supporting Statement for the New Annual Performance Report Form**

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 of a new Veterans Upward Bound (VUB) Annual Performance Report (APR) form to collect APR report data from projects funded by VUB Program grants. This APR reflects new VUB Program regulations enacted on October 26, 2010. The new regulations were necessitated by changes to the VUB Program in the Higher Education Opportunity Act (HEOA) of 2008. FY 2012-2013 is the first year of a five year grant cycle during which VUB projects are required to adhere to the new regulations.

The VUB program is a type of Upward Bound Program that provides 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 persons; (c) secondary schools; and (d) combinations of such institutions, agencies and organizations. The specific goal of VUB is to provide fundamental support and motivation to veteran participants in their preparation for college entrance and to assist them in the development of academic skills necessary for success in a program of postsecondary education. The program provides intense basic skills development in those academic subjects required for successful completion of high school equivalency opportunities for participants to succeed in their pre-college performance and ultimately in their higher education pursuits. VUB provides short-term remedial or refresher courses for veterans who are high school graduates but who have delayed pursuing postsecondary education. The program also provides special services, including mathematics and science preparation, to enable veterans to make the transition to postsecondary education. Funded projects are expected to assist veterans in securing support services from other locally available resources such as the Veterans Administration, State veterans agencies, veteran associations and other State and local agencies that

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

serve veterans. The goal of VUB is to increase the rate at which participants enroll in and graduate from institutions of postsecondary education (20 U.S.C. 1070a-13).

The information that grantees submit in the APR allows the Department to annually assess each grantee's progress in meeting their project's approved goals and objectives. The APR data are compared with the projects' approved objectives to determine the projects' accomplishments, to make decisions regarding whether funding should be continued, and to award "prior experience" (PE) points. The regulations for this program provide for awarding up to 15 points for PE (34 CR 645.32). 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. Funding recommendations and decisions are primarily based on the rank order of applications on the slate; therefore, assessment of PE points, based on data submitted in the APR, is a crucial part of the overall application process.

Further, this performance report form collects aggregated, quantifiable data needed to respond to the requirements of the Government Performance and Results Act (GPRA). In the Department's Fiscal Year 2010 Annual Performance Plan, the overall objective for the VUB Program is to: "Increase the percentage of low-income, first generation veteran participants who enter and succeed in a program of postsecondary education."

The Department collects information from VUB grantees under the authority of Title IV, Part A, Subpart 2, Chapter 1, Section 402C of the Higher Education Act of 1965, as amended, the program regulations in 34 CFR 645, and 34 CFR Sections 74.51, 75.720 and 75.732 of the Education Department General Administrative Regulations (EDGAR). URL links:
HEOA: <http://www2.ed.gov/about/offices/list/ope/trio/statute-trio-gu.pdf>
EDGAR: <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>
Program Regulations: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=b9bc048d99b7bb797a74566d37d8f9ef&rgn=div5&view=text&node=34:3.1.3.1.18&idno=34>

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 (i.e., to determine whether grantees are in compliance with the selection requirements for project participants) [34. CFR 645.3].

In addition, the Department uses the APRs to produce program-level data for annual reporting, budget submissions to Office of Management and Budget (OMB) and to Congress, Congressional hearings and testimonials; Congressional 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 VUB projects have been submitting the APR via the Internet since 2001.

The data collected are in the aggregate form at the program level. Data is not provided for 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.

The information grantees submit in their performance reports is unique to each project and is not collected elsewhere; therefore, no duplication exists. No other collection instrument is available to collect the information the Department is required to assess to determine grantees' PE points and program outcomes, as described in item 2, above. The data collected in the APR are fundamental to this program.

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 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 APRs 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 grant application. In addition, the information is needed to award PE points to grantees. Without this data collection, the Department would not have the data to assess the PE provision of the authorizing statute, respond to the GPRA and other program performance and efficiency measures, or 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.

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 measures for VUB which occurred as a result of the HEOA, grantees should track the academic progress of all prior-year

participants beginning with participants who completed their education program of study in 2008, until postsecondary completion.

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.

Department 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. Five respondents have submitted approximately eight individual comments (i.e., multiple comments from respondents) that were received after the 60-day comment period. The Department compiled a summary and analysis of the comments as well as information on changes to the proposed VUB APR in response to these comments. There is no burden/response/respondent increase from the 60-day notice public comments. A separate 30-day Federal Register notice will be published to solicit public comment on the new APR form following the 60-day Federal Register notice.

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. 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

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,

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.

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.

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

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)

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 867 hours. We estimate approximately 51 respondents. The performance reports are submitted annually.

	Number of Respondents	Estimated Preparation Time, per respondent	Total estimated burden hours
Public Sector	44	17	748
Private Sector	7	17	119
Totals	51	17	867

(Estimated burden: 867 hours. Total number of hours (preparation time) multiplied by the total number of respondents equals estimated burden hours). Preparation time includes 15 hours for professional staff to gather the information using computerized technology and 2 hours for clerical staff to enter the data into the Web-based form.

Professional staff (51 respondents X 15 hours X \$35 per hour)	\$26,775
Clerical staff (51 clerical staff members X 2 hours X \$18 per hour)	\$1,836
Total estimated cost to all respondents	\$28,611

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.

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.

Annual contract cost for development of APR Web application, Web-based data collection, Help Desk support, data processing, and grantee PE reports.	\$36,689
Analyses of data and preparation of national statistical reports.	\$35,000
Professional staff to update report form and prepare clearance package: \$55 per hour X 120 hours	\$9,900
Overhead (est. at 50%): 120 times \$27.50 Professional staff to review and edit reports for	\$13,200

dissemination: \$55 per hour X 160 hours Overhead (est. at 50%): 160 times \$27.50	
Clerical staff to type, route, and copy report form: \$19 per hour X 15 hours Overhead costs (est.at 50%): 15 times \$9.50	\$428
Other Department staff to review and approve the request: \$55 per hour X 10 hours Overhead costs (est. at 50%): 10 times \$27.50	\$825
OMB review (estimated): \$55 per hour X 8 hours Overhead costs (est. at 50%): 8 times \$27.50	\$660
TOTAL FEDERAL COST	\$96,702

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).

In previous years, the same APR was used for three of the TRIO programs (Upward Bound, Upward Bound Math and Science and Veterans Upward Bound) because of the similarities in the data collected for each program. However, statutory changes and subsequent new regulations resulted in significant differences in the performance measures for the VUB program. Specifically, grantees must track the academic progress of VUB participants through postsecondary completion and this will increase the reporting burden by six hours for each grantee. Therefore, this form will be used to collect data on VUB participants. Additionally, the final regulatory amendments to recordkeeping requirements require that a VUB grantee document the services a student who is served by more than one TRIO or other federally funded program is receiving from another program during the project year. This change will result in an increase of two additional burden hours.

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 PE points. Performance measures and efficiency measures for VUB, based on data conveyed in grantees' APRs, 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 2007–08 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.