

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.

Section 703 of the Higher Education Act of 1965, as amended, authorizes the Secretary to award fellowships under the Jacob K. Javits Fellowship Program for graduate study in the arts, humanities, and social sciences. The Javits award, a four-year fellowship, supports graduate students of superior ability selected on the basis of demonstrated achievement, exceptional promise and financial need. The U.S. Department of Education has administered the Jacob K. Javits Fellowship Program since 1986.

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, 75.720(a) and 75.720 (b)]. Currently, the Annual Report of Financial Need and Certification for the Jacob K. Javits Fellowship Program is submitted to the Program Officer for each budget period of the four-year grant cycle for the Jacob K. Javits Fellowship Program by each institution. Renewal for each fellow is dependent on continued academic progress as determined by the institution. In addition, the stipend portion of the fellowship is determined by the individual's financial need and must be reassessed each year. In order to continue funding for Javits fellows, institutions of higher education (IHEs) currently certify the academic progress of each fellow and report on the fellow's financial need.

The Annual Student Activities Report will provide the necessary information to track each fellow's progress toward degree completion. Without such critical data on the progress and performance of Javits fellows, it is difficult to measure the success of the Program's long-term goals or to further develop useful technical assistance methods for grantees. The information to be requested on the Javits fellows is in response to both congressional inquiries and the need for data to be collected for the Program's performance indicators, in compliance with the Government Performance and Results Act. Requests for data on Javits fellows have come from IHEs, Javits Coordinators,

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

professional associations, Members of Congress as well as The Office of Management and Budget (OMB).

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 Student Activities Reports will be reviewed by Program Officers to ensure compliance with the program requirements and to ensure the completion of grant funding activities.

The proposed data to be collected will be used for tracking the programs' performance indicators and efficiency measures: graduation rate, the average time to degree completion rate, employment status upon graduation, and the Federal Cost per terminal degree (Ph.D./M.F.A.) awarded.

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.

In fiscal year 2004, the Javits Program Staff developed and implemented an electronic version of the currently approved performance data collection instrument. The electronic version of the instrument is identical to the currently approved collection instrument. The instrument was electronically submitted to the individual fellows to allow for the option of electronic or hardcopy transmission of their responses. Eighty percent of individual fellows downloaded the forms for completion and submitted the completed forms to ED both electronically and via regular mail. The Javits program currently utilizes an electronic version of the currently approved performance data collection instrument, which is accessed online by individual fellows. In the future, it is expected that the majority of individual fellows will continue to respond in the same manner. The currently approved collection instrument may be viewed on the Office of Postsecondary Education Web site at <http://www.ed.gov/programs/jacobjavits/performance.html> .

This experience has led Javits Program Staff to conclude that electronic reports are the most effective means to collect programmatic data from individual fellows each academic year.

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 collection and use of this information is not duplicated within the U.S. Department of Education or any other government entity.

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.

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.

As the grants awarded under this Program are awarded on an annual basis, data must be collected as requested by OMB as part compliance requirements. If the data requested in this Annual Student Activities Report is not collected, program staff will not be able to determine whether or not funded projects were completed successfully and in accordance with the program statute and regulations. In addition, evaluation of the program based on its GPRA performance indicators and efficiency measure, or on other program evaluation criteria established by Departmental policies, will not be possible.

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.**

There are no circumstances that would cause this information collection to be conducted in this manner.

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.

60-day and 30-day Federal Register Notices for public comment will be published as required.

Requests for data on Javits fellows have come from IHEs, Javits Coordinators, professional associations, Members of Congress as well as OMB. The collection attached reflects the comments and requests of these groups, as well as clarifications based on questions to Program Staff. The information to be collected will also provide the Program Staff the data necessary to accurately address the Program's performance indicators and efficiency measure, in compliance with the Government Performance and Results Act. Data from all of these sources have been used to calculate hour and cost burden to respondents.

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

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. 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.

Responses to this data collection will be used only for reporting purposes. The reports prepared for this study will summarize findings to be presented to Congress and other relevant review parties. Any collected data made public would only be presented in aggregate, and would not include personal information.

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.

No questions of a sensitive nature are asked in this report.

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**

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)

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.

	Number of Respondents	Frequency of Response	Hours	Total Burden Hours
Individual Fellow	100	Annual	3	300
Totals	100	Annual	3	300

The burden of individual respondents is estimated at an average of 3 hours for each Javits fellow. These estimates are based on input from current respondents.

Estimated total annual cost burden to respondents.

Respondent Type	Number of Respondents	Frequency of Response	Hours	Total Burden Hours	Wage	Total Cost
Individual Fellow	100	Annual	3	300	\$30 /hour	\$9,000.00
TOTALS	100		3	300		\$9,000.00

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 start-up costs. There are no costs associated with this collection.

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 annualized cost to the Federal Government.

Task	Cost	Hours	Number of Staff	Hours Total	Total Cost to USG
Securing OMB approval (every 3 years)	\$45/hr	10	6	60	\$2,700.00
Reports Design (every 3	\$45/hr	8	2	16	\$720.00

years)					
Review Of Forms by Staff	\$45/hr	8	2	16	\$720.00
Data Entry for Reports by Staff	\$45/hr	8	2	16	\$720.00
Annual Monitoring and Technical Assistance	\$45/hr	8	2	16	\$720.00
Other Department Staff Review	\$58/hr	5	5	25	\$1,450.00
Totals				149	\$7,030.00

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).

A reduction in burden occurred in this information collection as a result of a decrease in the number of Javits grantees receiving non-competing continuation institutional awards since the collection was last approved in 2011. The last Javits Program fellowship competition was held in FY 2011. Therefore, no new institutional awards have been made since that time, which decreased the number of continuing grantees and decreased the number of continuing fellows required to report annually. As individual Javits fellows attending these institutions complete their degree programs and no longer need funding, the number of remaining fellows further decreases. Since the last collection was approved, the number of respondents decreased from 190 to 100, creating a reduction in the Total Burden Hours for Individual Fellows from 570 to 300. However, since the last collection was approved, the Estimated Annualized Cost to the Federal Government increased from \$6,583.00 to \$7,030.00 as shown in the Table in item 14.

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 of this data collection.

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

No exceptions are being requested for this information collection.