

## **SUPPORTING STATEMENT**

### **Application for Grants under the Student Support Services Program**

#### **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 section<sup>1</sup>. 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 U.S. Department of Education (Department) is requesting a reinstatement with changes of a previously approved collection to make new grants under the Student Support Services (SSS) Program. The previous collection was discontinued and approval will allow the Department to use the application to award new grants and collect data under the SSS Program.

SSS supports projects that assist low-income, first-generation, and/or disabled students who are already enrolled in postsecondary education in transferring from 2-year to 4-year institutions of higher education (IHEs) or in persisting in and graduating from 4-year institutions. Grants are awarded to 2-year and 4-year IHEs for a length of five years. Grantees provide a broad range of support services to project participants, including tutoring, advice on course selection, financial aid counseling, services to improve financial and economic literacy, assistance in applying for graduate school, and activities designed to assist students in transferring from 2-year IHEs to 4-year IHEs. Projects may also provide personal and career counseling, exposure to cultural events, mentoring, and activities tailored to the needs of homeless students, students in foster care, Limited English Proficiency students, and students with disabilities. Additionally, projects may provide grant aid.

This application would include required and permissible services or activities; outcome criteria used in assessing prior experience; selection criteria; and a description of the processes and procedures for the second review of unsuccessful applications. The SSS Program grant competition is authorized by the Higher Education Act (HEA) of 1965, as amended by the Higher Education Opportunity Act (HEOA) of 2008. An electronic version of the HEOA's amendments to the HEA may be found at the Department's website at the following address: <http://www2.ed.gov/about/offices/list/ope/trio/statute-trio-gu.pdf>.

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<sup>1</sup> 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 application package requests programmatic and budgetary information needed to evaluate new applications and make funding decisions based on the authorizing statute, program regulations, and EDGAR. Failure to collect this information would prevent the awarding of appropriated funds; essential information would not be available for evaluating the applications in accordance with the statute and regulations.

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.

For fiscal year 2015, as a part of the Department's goal to increase the electronic submission of applications, applications for grants under the SSS program will be submitted electronically via the Grants.gov portal. We estimate that the Department will receive 100 percent of the applications electronically.

The application package has been prepared in a format for easier and faster posting of information on the Web. Prospective applicants will be able to view and download the application through the FIND function on Grants.gov at <http://www.Grants.Gov>.

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 application is unique to each respondent, no duplication exists as far as can be determined. There is no other collection instrument 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.

If the collection is not conducted or is collected less frequently, the Department cannot meet its grant making responsibilities, including the publication of closing date notices, providing technical assistance to potential applicants, conducting peer reviews of grant applications, transmitting slates with funding recommendations to Department officials for approval, and making grant awards.

The Department needs to make grant applications available to its constituencies to give eligible applicants time to develop and submit applications, and to make new fiscal year grant awards in a timely manner.

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 a 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 informal views and comments from persons outside the Department during ten pre-application workshops for the SSS Program as mandated by statute. The Department will publish a 30-day Federal Register notice allowing public comment on this collection.

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

The Department will 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.<sup>2</sup> 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.

There is no assurance of confidentiality.

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<sup>2</sup> 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)

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.

This application 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.

The estimated burden hours for this collection of information are 54,466 hours. We estimate approximately 1,633 respondents, including those who respond under the second review process.

In order to reach this current 54,466 total burden estimate, we reviewed the previous estimate when this application was last active, and factored in several changes resulting from the new regulations including a formal second review process for unsuccessful applicants that fall within an established “funding band.” We estimate that approximately 33 applications will

score within the funding band, resulting in 66 additional burden hours from the previous applications (33 applications received x 2 hours) = 66 hours.

Estimated number of respondents under the first review	1,600
Estimated preparation time under the first review	34 hours
Estimated burden hours under the first review	54,400 hours
Estimated number of respondents under the second review	33
Estimated preparation time under the second review	2 hours
Estimated burden hours under the second review	66 hours
Total estimated burden hours	54,466

Affected Public  
(Estimated Burden Hours):

Institutions of higher education	1,600 respondents x 34 hours = 54,400 estimated burden hours
Affected Public (Estimated Burden Hours)	54,400 hours

(Estimated Burden Hours for Second Review):

Institutions of higher education	Estimated burden hours for second review 33 respondents x 2 hours = 66 hours
Affected Public (Estimated Burden Hours for Second Review)	66 hours

Total Affected Public Estimated Burden Hours.....54,466

**Average burden hours per respondent (54,466 total hours/1,633 respondents = 33)**

Estimated Cost to Respondents for Regular Submission

Professionals: 1,600 personnel x 34 hours x \$30 per hour = \$1,632,000 Overhead at 50% of salary=\$816,000	\$2,448,000
<i>Total estimated staff costs to respondents</i>	\$2,448,000

(a) One time cost to applicant: Use of computer equipment to search for data and generate application in required format. Computer time is \$200 and Printing is \$10.00 <b>(1,600 applicants x \$210)</b>	<b>\$336,000</b>
(b) Operation Cost Annual cost to applicant to find and maintain application materials is \$100. <b>(1,600 applicants x \$100)</b>	\$160,000
<i>Total estimated annual costs to respondents</i>	\$2,944,000

**Total Annual Costs to Respondents: \$2,944,000**

(Staff Costs: \$2,448,000 + 496,000 = Annual Costs for responding: \$2,944,000)

Estimated Cost to Respondents for Second Review/Appeals Submission

Professionals: 33 personnel x 2 hours x \$30 per hour total =	\$1,980
<i>Total estimated staff costs to respondents for Appeals</i>	\$1,980
(a) One time cost to applicant: Use of computer equipment to search for data and generate appeal in required format. Computer time is \$200 and printing is \$10 (33 applicants x \$210)	\$6,930.00
(b) Operation Cost Annual cost to applicant to compile materials for appealing is \$100. (33 applicants x \$100)	\$3,300.00
<i>Total estimated annual cost to respondents for Appeals.</i>	\$12,210.00

**Total Annual Costs to Respondents for Appeals: \$12,210.00**

(Staff Costs: \$1,980.00 + 10,230 Annual Costs for Responding: \$12,210.00)

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)	:	
		<u>0</u>
Total Annualized Costs Requested	:	

Annual Costs to Respondents (capital/start-up, and operation and maintenance): The total for the capital and start-up cost components for this information collection is zero. This information collection will not require the purchase of any capital equipment nor create any start up costs.

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.

Cost to Federal Government:



Professional staff to develop clearance package (GS-14 employee) 160 hrs @ \$55 per hour	\$8,800
Overhead cost related to facilities, administration, and other indirect cost plus accrual of leave and fringe benefits @ 50 percent salary.	\$4,400
Other Department staff to review and approve the request	
GS-15 Employee	\$630
OMB Review 8 hours X \$45 per hour = \$360 x 50 percent overhead = \$180.00	\$540
<b><i>Estimated Sub-total</i></b>	<b>\$14,370</b>
<b>Cost for Federally-supervised review of applications</b>	
Outside field reviewers – 480 readers @ \$1,100 each	\$528,000
Processing applications – staff (2 staff x 40 hours x \$48 per hour = \$3,840) (Overhead cost: \$3,840 x 50 percent = \$1,920)	\$5,760
Contractor logistical support for workshop, archiving prior unfunded applications, application processing, field reading and slate preparation (14 weeks-reading)	\$2,682,658.81
Staff time for conducting supervised review. (6 week x 3 control reviews and 3 panel chairpersons) (30 staff x 240 hours x \$48 per hour = \$345,600) (Overhead cost: \$345,600 x 50 percent = \$172,800)	\$518,400
Staff time for generating slate (3 staff x \$48 per hour x 40 hours = \$5,760) (Overhead cost: \$5,760 x 50 percent = \$2,880)	\$8,640
Staff time to review and approve funding recommendations (955 awards x 4 hours per award x \$48 per hour = \$183,360) (Overhead cost: \$183,360 x 50 percent = \$91,680)	\$275,040
Staff time to generate, approve, and issue grant awards (6 hours per award x 955 awards = 5,730 hours) (\$48 per hour x 5,730 hours = \$275,040) (Overhead cost: \$275,040 x 50 percent = \$137,520)	\$412,560
<b><i>Total estimate cost to government (competitive year)</i></b>	<b>\$4,445,428.81</b>

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).

Since this collection is a reinstatement, all 54,466 hours of burden are considered new burden and represent a program change. The current burden hour estimate is based on 1,633 respondents, including those who respond under the second review process.

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.

Results of collected information will not be published.

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.