

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.

Consistent with the provisions of Title VII, Part B of the Higher Education Act of 1965, as amended (HEA), the Fund for the Improvement of Postsecondary Education (FIPSE) works to improve postsecondary education through grants to institutions of higher education and other nonprofit institutions and agencies. Such grants are awarded on the basis of competitively reviewed applications submitted to the Office of Postsecondary Education under the First in the World (FITW) program. The Department of Education is requesting permission to conduct data collection for the First in the World programs, 84.116F and 84.116X. This collection includes a performance report for use with First in the World 84.116F and 84.116X. We request clearance of one annual performance report for FITW programs 84.116F and 84.116X that will serve the dual purpose of an annual and final performance report. A total of two (2) items comprise this collection: the annual report form for FITW projects and the FITW program burden statement. The governing regulations for these programs are contained in 34 CFR Part 75 (Education Department General Administrative Regulations). The collection of this data is necessary to evaluate and assess each grantee for continued funding and assessment of their project.

*Link to applicable legislation & regulations:
First in the World (84.116F and 84.116X)
<http://www2.ed.gov/programs/fitw/legislation.html>*

The performance report has been revised since OMB's last review and approval of the form. The changes to the report are listed below with the rationale behind the change.

Performance Data section

- *Clarifying language was incorporated to allow for selection of Secretary's priorities corresponding to grantee project objectives. The revised report includes questions that*

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

are better aligned with gathering data specific to grantee objectives and the Secretary's Priorities for discretionary grant programs.

- *More concise language was incorporated to consolidate questions and reduce redundant and/or non-applicable inquiries.*
- *Questions pertaining to the Department of Education/FIPSE services were removed. This information is acquired during the Project Director's meeting which occurs before the request for information in the performance report. The early retrieval of feedback on FIPSE services permits timely attention to the grantees' questions and needs.*
- *Questions pertaining to press coverage and project outputs were removed from the Performance Data section. This information is gathered in the Performance Narrative and Evaluation Report.*
- *Questions related to sustainability of select project objectives were removed from the Performance Data section. This information is gathered in the Performance Narrative and Evaluation Report.*

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.

First in the World (84.116F and 84.116X) Project Forms (annual and final performance reports): The annual and final performance reports are necessary to ensure that the information and data to be collected will result in a balanced and effective assessment of the program's goals. The FITW program is designed to support the development, replication, and dissemination of innovative solutions and evidence for what works in addressing persistent and widespread challenges in postsecondary education. The U.S. Department of Education standard forms for annual and final performance reports ask grantees to provide information that is not suited to consortium-based projects, which FIPSE supports, and the standard forms request information that does not adequately capture the performance metrics of FIPSE programs. FIPSE places great emphasis on the collection of information from performance reports as a means to assure the quality of program management and show progress toward meeting the program's performance goals. The information to be collected in the forms reflects the focus of the project activities much more accurately and includes a required evaluation report. The FIPSE performance report includes a request for budgetary data, partner/consortium engagement, performance narrative, evaluation report, and a logic model. Grantees also provide information describing the key accomplishments and challenges of the project.

The reports are collected via the FIPSE database (<https://fipsedatabase.ed.gov>) which provides a portal to collect and analyze the Annual Performance Report. The FIPSE database provides descriptive data on funded FIPSE projects, and data on disciplines, curriculum development, and new technologies. The database can be used to generate reports to help monitor and assess programs. The database also serves as an internal control for monitoring grant expenditures and enhancing transparency of project activities. It will also serve as a safeguard and check-and-balance system against possible fraudulent activity. FIPSE staff need to closely monitor these projects to ensure that tax payer funds are spent according to Federal regulations. This collection will be conducted annually, based on availability of funding for grants under Title VII, Part B of the Higher Education Act of 1965, as amended.

The data provided in the performance reports will help assure that grant expenditures were used toward the accomplishment of specified project objectives and determine if grant recipients have expended funds in accordance with the authorizing legislation and regulations for FIPSE programs. Results of the annual and final performance report will be used to build evidence for what works in postsecondary education by the U.S. Department of Education and its stakeholders.

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 Office of Postsecondary Education is committed to the reduction of paperwork. Electronic submission has reduced the burden for both the grantee and Department staff as it streamlines the preparation, submission, and review process. The collection of information requested in the annual and final performance reports for FITW (84.116F and 84.116X) is Web-based. Grantees will be able to use the FIPSE database (www.fipsedatabase.ed.gov) to submit annual and final performance information on their grants. First in the World programs 84.116F and 84.116X will use the same forms for the annual and final performance report.

The data collected in the FIPSE database enables the program officers to conduct program evaluation of FIPSE's programs to provide outcomes and outputs as well as improve the management of the programs.

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 submitted in performance reports is unique to each respondent. In addition, FIPSE staff review the information collected in an effort to assure that there is no duplication of data acquisition. Moreover, the information collected changes annually as the grantee makes progress on the objectives of the grant.

No other existing information collection can serve the purposes described in Item 2.

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.

Not applicable –The collection of information does not impact 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.

According to the Government Performance and Results Act of 1993 (GPRA), FIPSE grant programs are required by law to collect information regarding program and project effectiveness.

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 special circumstances that would require the collection to be conducted as outlined above in question 7.

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.

Each year FIPSE staff evaluates the effectiveness of grants and related processes, including data collection, through regular telephone and e-mail contact with project directors, an annual meeting of the project directors, and annual performance reports submitted by the grantees. Information gathered through such means is focused on objectives unique to the individual projects within the FIPSE programs. The FIPSE database greatly facilitates a comprehensive program evaluation, such as the effectiveness of the consortia format or student learning outcomes that are common to a cohort of projects.

In addition, a separate 60-day Federal Register notice followed by a 30-day Federal Register notice will be published to solicit public comments. The FIPSE staff will respond to any questions or comments resulting from the publication of the information collection in the Federal Register as required by 5 CFR 1320.8(d).

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

No gifts or payments will be 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.

The Department's disclosure policies adhere to the provisions of the Privacy Act. There are no assurances of confidentiality provided to respondents.

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)

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.

Questions of a sensitive nature are not included in this information collection.

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.

<i>ANNUAL/FINAL REPORT</i>	<i>Form for 84.116F and 84.116X</i>
<i>Number of respondents</i>	<i>100</i>
<i>Frequency of response</i>	<i>Annual</i>
<i>Hour burden</i>	<i>40</i>
<i>Total burden</i>	<i>4000</i>
<i>Total est. cost to respondents</i>	<i>\$200,000 (@\$50/hr.)</i>

- *Annual grand total burden hours for one (1) form: 4,000 hours*
- *Annual grand total estimated cost to respondents for one (1) form: \$200,000*

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 : _____

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 and will not 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 the Federal Government		
FIPSE staff time for development of Annual Performance Report	GS-14 employee: 20 hrs. @ \$40 per hr.	\$800
Forms/FIPSE database development costs	Flat rate Contractor personnel costs	\$10,000
FIPSE staff time for conducting review of Annual Performance Report	2 hours per respondent (100 responses) = 200 hrs. @ \$40 per hr. for GS-14 employee	\$8,000
Evaluator time for conducting review of evaluation component of Annual Performance Report	Flat rate Contractor personnel costs	\$48,000
Overhead cost related to program administration and other indirect costs	\$3,000 x @ 50% salary	\$1,500
	Total Annual Government Estimated Cost	\$68,300

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 current request for revision to the collection is the result of format changes, such as consolidation of questions, incorporation of clarifying language, partner/consortium engagement, and the evaluation component of the report. The revision to the collection facilitates more streamlined data retrieval and review of information by FIPSE staff. The revision to the collection increases the burden hours from 10-17 hours to 40 hours per respondent. The increase in burden hours resulted from the incorporation of data from the evaluation component of the performance report. The increase in burden hours is deemed necessary for completion of the report.

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 findings and results obtained from this collection will be based on self-reported information and on inferences and conclusions drawn across all of the funded projects. Selected information is available on the FIPSE web site: <http://www2.ed.gov/about/offices/list/ope/fipse/index.html>.

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.

Not applicable. We will display the expiration date for OMB approval of the information collection.

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

Not applicable. There are no exceptions to the certification statement.