

**Application for Grants under the
Veterans Upward Bound Program for Federal TRIO Programs
*Supporting Statement for Paperwork Reduction Act Submission***

A. Justification

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

The U.S. Department of Education is requesting a reinstatement with change of a previously approved collection to make new grants under the Veterans Upward Bound (VUB) Program. The previous collection was discontinued and approval of this new collection will allow the Department to use the application to award new grants and collect data under the VUB program. The fiscal year (FY) 2017 application incorporates the evidence-based standard of “strong theory” and removes previously used competitive preference priorities.

The VUB program provides grants to institutions of higher education, public and private agencies and organizations, community-based organizations with experience in serving disadvantaged youth, combinations of such institutions, agencies and organizations, and secondary schools. The VUB program provides grants to projects designed to prepare, motivate, and assist military veterans in the development of academic and other skills necessary for acceptance into and success in a program of postsecondary education.

The VUB program grant competition is authorized by Title IV, Part A, Sections 402A and C of the Higher Education Act of 1965, as amended by the Higher Education Opportunity Act (HEOA); and

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

governed by the program regulations in 34 CFR Part 645; the Uniform Guidance 2 CFR Part 200.74 and 200.80; and the Education Department General Administrative Regulations (EDGAR), Parts 75 (except for §§ 75.215-75.221), 77, 79, 82, 84, 85, 86, 97, 98 and 99.

<http://www2.ed.gov/programs/triovub/legislation.html>

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, the Uniform Guidance 2 CFR Part 200.74 and 200.80 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 2017, as a part of the Department's goal to increase the electronic submission of applications, applications for grants under the VUB program will be submitted electronically via the Grants.gov portal. We estimate that the Department will receive 99 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.

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.

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 the manner covered under any of the special circumstances outlined.

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Department will solicit informal views and comments from persons outside the Department during pre-application workshops for VUB throughout the country as mandated by statute. The Department will also 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.

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 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 application 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.

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)

- 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 total estimated burden hours for this collection of information are 4,606 hours. We estimate approximately 143 respondents, which includes 135 original respondents and 8 respondents under the second review process. Applications are submitted annually during a competition year.

The regulations include a formal second review process for unsuccessful applicants that fall within the funding band. We estimate that approximately 8 applications will score within the funding band, resulting in 16 additional burden hours from the previous applications (8 applications received x 2 hours = 16 hours).

Estimated number of respondents under the first review	135
Estimated preparation time under the first review	34
hours	
Estimated burden hours under the first review	4,590
hours	
Estimated number of respondents under the second review	8
Estimated preparation time under the second review	2
hours	
Estimated burden hours under the second review	
16 hours	
Total estimated burden hours	4,606

Affected Public
(Estimated Burden Hours):

Public, State, Local Institutions	113 respondents x 34 hours = 3,842 estimated burden hours
Private Non-Profits, For-Profits	22 respondents x 34 hours = 748 estimated burden hours
Total Estimated Burden Hours	4,590 hours

(Estimated Burden Hours for Second Review):

Public, State, Local Institutions	Estimated burden hours for second review: 7 respondents x 2 hours = 14 hours
Private Non-Profits, For-Profits	Estimated burden hours for second review: 1 respondents x 2 hours = 2 hours
Total Estimated Burden Hours for Second Review	16 hours

4,606 Total Affected Public Estimated Burden Hours.....

Estimated Cost to Respondents for Regular Submission

Professionals: 135 personnel x 27 hours x \$30 per hour = \$109,350 Overhead at 50% of salary = \$54,675	\$164,025
Clericals: 135 personnel x 7 hours x \$12 per hour = \$11,340 Overhead at 50% of salary = \$5,670	\$17,010
<i>Total estimated staff costs to respondents</i>	\$181,035

(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. (135 applicants x \$210)	\$28,350
(b) Operation Cost: Annual cost to applicant to find and maintain application materials is \$100. (135 applicants x \$100)	\$13,500
<i>Total estimated annual costs to respondents</i>	\$41,850

Total Annual Costs to Respondents: \$222,885
(Staff Costs: \$181,035 + Annual Costs for Responding: \$41,850)

Estimated Cost to Respondents for Appeals Submission

Professionals: 8 personnel x 1 hour x \$30 per hour = \$240 Overhead at 50% of salary = \$120	\$360
Clericals:	\$144

8 personnel x 1 hour x \$12 per hour = \$96 Overhead at 50% of salary = \$48	
<i>Total estimated staff costs to respondents for appeals</i>	\$504
(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. (8 applicants x \$210)	\$1,680
(b) Operation Cost: Annual cost to applicant to compile materials for appealing is \$100. (8 applicants x \$100)	\$800
<i>Total estimated annual cost to respondents for appeals</i>	\$2,480

Total Annual Costs to Respondents for Appeals: \$2,984
(Staff Costs: \$504 + Annual Costs for Responding: \$2,480)

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.

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.

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.

Cost for development and approval of clearance package	
Professional staff to develop clearance package (GS-14 employee) 160 hours x \$55 per hour	\$8,800
Overhead cost related to facilities, administration, and other indirect costs plus accrual of leave and fringe benefits @50% 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% overhead = \$180	\$540
<i>Estimated Sub-total</i>	\$14,370
Cost for Federally-supervised review of applications	
Outside field reviewers - 50 VUB readers @ \$1,100 each	\$55,000
Processing applications - staff (6 staff x 40 hours x \$48 per hour = \$11,520) (Overhead cost: \$11,520 x 50 percent = \$5,760)	\$17,280
Contractor logistical support for workshops, archiving prior unfunded applications, application processing, field reading and slate preparation (2 weeks-reading)	\$250,000
Staff time for conducting supervised review	

(2 weeks x 5 control reviews, and 14 panel chairpersons) (19 staff x 80 hours x \$48 per hour = \$72,960) (Overhead cost: \$72,960 x 50 percent = \$36,480)	\$109,440
Staff time for generating slate (3 staff x 40 hours x \$48 per hour = \$5,760) (Overhead cost: \$5,760 x 50 percent = \$2,880)	\$8,640
Staff time to review and approve funding recommendations (49 awards x 4 hours per award x \$48 per hour = \$9,408) (Overhead cost: \$9,408 x 50 percent = \$4,704)	\$14,112
Staff time to generate, approve, and issue grant awards (49 awards x 6 hours per award x \$48 per hour = \$14,112) (Overhead cost: \$14,112 x 50 percent = \$7,056)	\$21,168
<i>Estimated Sub-total</i>	\$475,640
Total estimated cost to government (competitive year)	\$490,010

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 collection package is a reinstatement, with change. Previously used priorities have been removed and a new evidence-based standard has been added in anticipation of the FY 2017 competition.

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 for statistical purposes.

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.