

## **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 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 purpose of the GEAR UP partnership and state applications is to allow partnerships and states to apply for funding under the GEAR UP program. Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP), created in the Higher Education Act Amendments of 1998 (Title IV, Section 404A-404H), is a discretionary grant program which encourages applicants to provide support and maintain a commitment to eligible low-income students, including students with disabilities, to assist the students in obtaining a secondary school diploma and preparing for and succeeding in postsecondary education. GEAR UP provides grants to partnerships and states to provide services at high-poverty middle and high schools. GEAR UP grantees serve an entire cohort of students beginning no later than the seventh grade and follow them through graduation and, optionally, the first year of college.

This is a revision of the GEAR UP application 1840-0821.

<http://www2.ed.gov/programs/gearup/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 information is collected in the form of grant applications submitted by partnerships and states. Note that partnerships consist of at least one institution of higher education, at least one local educational agency, and not less than two other community organizations or entities, such as businesses or professional organizations.

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<sup>1</sup> Please limit pasted text to no longer than 3 paragraphs.

The Department of Education uses the information in the applications to evaluate those grant applications and select grant recipients. For applications that are approved for awards, the application information also serves as a basis for monitoring project performance based on the project design, objectives, evaluation plans, and other information described in the grant application.

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 GEAR UP program will require applicants to submit applications electronically through the Grants.gov system. If an applicant cannot submit an application electronically, the applicant may seek a waiver of this requirement.

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.

This information does not duplicate any other information collection effort. The information collection is relevant only to grant applications under the GEAR UP program. There is no similar information available in other forms or as the result of other information collections.

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.

All steps possible are taken to minimize burdens on small businesses or other small entities, including the use of electronic applications. This collection will 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.

Without the data collection, the Department of Education could not solicit grant applications, conduct grant competitions, or make new grant awards under the GEAR UP program. Data are collected only when there are funds available to award new GEAR UP grants.

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.

Grantees are required to retain records for more than 3 years due to the length of GEAR UP grants (6-7 years).

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 publish the 30 day Federal Register notice as required by 5 CFR 1320.8(d), soliciting comments on the information collection.

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.<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.

No assurance of confidentiality will be provided to respondents as no assurances are included in the statute or regulations.

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 questions are not of a sensitive nature.

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

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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)

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 13.

**PARTNERSHIP ONLY:**

Estimated number of respondents ..... 500  
 Estimated average hours per respondent in collection of information (27,750 ÷ 500)....  
 .....approximately 56 average hours per respondent

Estimated Cost to Respondents

Personnel & Operating Cost	Annual Hour Burden	Wage	Number of Respondents	Total Cost
Professional Personnel	56	\$30/hour	500	\$840,000
Overhead estimate @ 50% salary				\$420,000
Computer time @ \$200 & Printing @ \$10 = \$210			500 ((\$210 X 500))	\$105,000
Operational Cost @ \$100 (Application materials)			500	\$50,000
Total Estimated Cost to Respondents				\$1,415,000

**STATE ONLY:**

Estimated number of respondents .....45  
 Estimated average hours per respondent in collection of information (2,710 ÷ 45)  
 .....approximately 60 average hours per respondent

**Estimated Cost to Respondents**

<b>Personnel &amp; Operating Cost</b>	<b>Annual Hour Burden</b>	<b>Wage</b>	<b>Number of Respondents</b>	<b>Total Cost</b>
Professional Personnel	60	\$30/hour	45	\$81,000
Overhead estimate @ 50% salary				\$40,500
Computer time @ \$200 & Printing @ \$10 = \$210			45 (\$210 X 45)	\$9,450
Operational Cost @ \$100 (Application materials)			45	\$4,500
<b>Total Estimated Cost to Respondents</b>				<b>\$135,450</b>

	<b>Partnership</b>	<b>State</b>	<b>Total</b>
Total Number of Responses	500	45	545
Total Number of Hours	27,750	2,710	30,460
Total Cost to Respondents	\$1,415,000	\$135,450	\$1,550,450

The total number of responses is 545. The total number of burden hours is 30,460. The total cost to respondents is \$1,550,450.

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 :\$.00  
 Total Annual Costs (O&M) : .00

Total Annualized Costs Requested : \$.00

There are no additional costs to respondents beyond those shown in question 12.

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.

**PARTNERSHIP ONLY:**

The estimated cost to the Federal Government:

Activities/Task	Cost	Hours	Number of Staff	Number of Respondents	Total Cost to Fed. Govt.
Application clearance package development	\$45	120	1		\$5,400
Overhead cost: facilities, administration, & other direct cost @ 50% of salary					\$2,700
Securing OMB approval clearance & overhead cost @ 50%	\$45	40	1		\$1,800 \$ 900
Technical assistance to	\$45	1	5	500	\$112,500

potential applicants & over - head cost @ 50%		hr/App			\$ 56,250
GEAR UP staff pre-screening application & overhead cost @ 50%	\$45	1 hr/App	5	100	\$22,500 \$11,250
Staff time for conducting supervised panel review for 2 weeks & overhead cost @ 50%	\$45	80	25		\$90,000 \$45,000
Contractual cost for peer review (labor, honorarium, travel, materials, & database)					\$477,500
GEAR UP staff processing successful applications in G5 and completing other requirements & overhead @ 50%	\$45	2 hrs/ app		96	\$8,640 \$4,320
Preparing and issuing notification of award to successful applicants & overhead cost @ 50%	\$45	1 hrs/ app		96	\$4,320 \$2,160
<b>Total estimated cost to government (competitive year)</b>					<b>\$845,240</b>

**STATE ONLY:**

The estimated cost to the Federal Government:

<b>Activities/Task</b>	<b>Cost</b>	<b>Hours</b>	<b>Number of Staff</b>	<b>Number of Respondents</b>	<b>Total Cost to Fed. Govt.</b>
Application clearance package development	\$45	40	1		\$1,800
Overhead cost: facilities, administration, & other direct cost @ 50% of salary					\$900
Securing OMB approval clearance & overhead cost @ 50%	\$45	8	1		\$360 \$180
Technical assistance to potential applicants & overhead cost @ 50%	\$45	1 hr/App		45	\$2,025 \$1,013
GEAR UP staff pre-screening application &	\$45	1 hr/App		45	\$2,025 \$1,013



overhead cost @ 50%					
Staff time for conducting supervised panel review for 2 weeks & overhead cost @50%	\$45	80	3		\$10,800 \$5,400
Contractual cost for peer review (labor, honorarium, travel, materials, & database)					\$122,500
GEAR UP staff processing successful application in G5 and completing other requirements & overhead @ 50%	\$45	2 hrs/app		17	\$1,530 \$765
Preparing and issuing notification of award to successful applicants & overhead @ 50%	\$45	1 hrs/app		17	\$765 \$383
Totals estimated cost to government (competitive year)					\$151,459

The total estimated cost to the Federal Government:

Partnership	State	Total
\$845,240	\$151,459	\$996,699

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 decrease in responses (-26) and burden hours (-130) is due to the elimination of the College Savings Account Program. The annual cost burden shown in the previous clearance was zero; the increased annual cost burden shown in this clearance request reflects the total cost to respondents.

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 for 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.