

U.S. Department of Education

High School Equivalency Program (HEP)

*Office of Management and Budget
Clearance Package Supporting Statement
And Data Collection Instrument*

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A. JUSTIFICATION

A1. 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. 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 Office of Migrant Education (OME) is collecting information for the High School Equivalency Program (HEP) which is authorized under Title IV, Section 418A of the Higher Education Act of 1965, as amended by Section 408 of the Higher Education Opportunity Act (HEOA)(20 U.S.C. 1070d-2) (special programs for students whose families are engaged in migrant and seasonal farmwork) and 2 CFR 200.328 which requires that recipients of discretionary grants submit an Annual Performance Report (APR) to best inform improvements in program outcomes and productivity.

Although the Education Department continues to use the generic 524B, OME is requesting to continue the use of a customized APR that goes beyond the generic 524B APR to facilitate the collection of more standardized and comprehensive data to inform Government Performance Results Act (GPRA) indicators, to improve the overall quality of data collected, and to increase the quality of data that can be used to inform policy decisions.

A2. Indicate how, by whom, and for what purpose the information will be used. 1Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The OME staff will continue to collect information via the APR submitted by HEP grantees in compliance with 2 CFR 200.328. APRs are submitted once a year and are used to monitor grantee progress. We request a customized APR that goes beyond the generic 524B APR to facilitate the collection of more standardized and comprehensive data used to inform GPRA, improve the overall quality of data collected, and increase the quality of data that has been used for evaluation and to inform policy decisions.

Using the information collected in the APR, OME has been able to develop decision rules to measure whether or not grantees have made substantial progress from year to year. OME then requires grantees that have not made substantial progress to submit a corrective action plan, which includes benchmarks for improving their program performance. As a result of this analysis, OME has been able to use objective data to determine discontinuation of funding for grantees that have continually failed to make substantial progress in accordance with the national performance measures for High School Equivalency Diploma attainment and placement, despite the provision of technical assistance by OME.

A3. 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 APR form will be collected via an electronic form accessible to grantees via the internet. This submission format will ensure the timeliness of submission, accuracy of data, and reduce cost or burden associated with regular mail. It will also limit the program office's cost associated with data analysis. All information collected in support of the APR will be collected in compliance with grantee evaluation

requirements.

A4. 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.

There is no duplication of reporting on the HEP APR. Data are reported annually covering the specified reporting period. The information requested on the APR from HEP grantees is not collected or reported elsewhere.

A5. If the collection of information involves 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 data collection does not involve small businesses or other small entities.

A6. Describe the consequences to the 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.

The APR is a program performance reporting requirement of funded HEP projects, as stipulated in 2 CFR 200.328. Annual reporting ensures each grantee provides a report that contains:

- A comparison of actual accomplishments to the program objectives of the Federal award and the project objectives established for the period;
- The reasons established goals were not met, if appropriate; and
- Additional pertinent information including, when appropriate, analysis and explanation of cost overruns and high unit cost.

Less frequent or no annual reporting risks waste, inefficiency and/or lack of progress on desired indicators due to insufficient oversight. In addition, OME would like to use data from the customized APR to improve the quality of the performance data.

A7. 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 is no special circumstance that would require the collection to be conducted in a manner inconsistent with OMB guidelines.

A8. If 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 60 day notice was published in the Federal Register on June 27, 2018 (83 FR 30150). No substantive comments were received. A 30-day notice will be published.

A9. Explain any decision to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

There are no payments or gifts to grantees in support of the data collection.

A10. 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. 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 are no assurances of confidentiality to grantees.

A11. 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.

There are no questions of a sensitive nature on the APR.

A12. Provide an estimate in hours of the burden of the collection of information.

The average estimated burden per grantee is 23 hours, and the total estimated burden for all grantees is

1,173 hours (23 hours x 51 grantees). The estimated burden per grantee has been **reduced** from 32 hours to 23 hours (28%), which has resulted in a total estimated burden that has been reduced by 459 hours (from 1,632 hours to 1,173 hours). This reduction in estimated burden is due to elimination of the GPRA 1 Documentation Form, and a reduction in reporting requirements in APR Section B, Project Student Participant Information, and APR Section C, Project Services Information.

File Requirement	Estimated Hours of Burden Per Grantee (2018 APR)	Total Estimated Hours of Burden for 51 Grantees (2018 APR)	<i>Previous Estimated Hours of Burden Per Grantee (2017 APR)</i>	<i>Previous Total Estimated Hours of Burden for 51 Grantees (2017 APR)</i>
Cover Sheet	3.2	163.2	3.2	163.2
APR Section A	6.4	326.4	6.4	326.4
APR Section B	3.3	168.3	6.2	316.2
APR Section C	0.1	5.1	3	153
APR Section D	6	306	6	306
APR Section E	3.2	163.2	3.2	163.2
APR Section F	0.8	40.8	0.8	40.8
GPRA 1 Documentation Form	0	0	3.2	163.2
TOTAL	23 Hours	1,173 Hours	32 Hours	1,632 Hours

Using the 2018 General Schedule (GS) cost estimate of \$41.20 per hour (base pay scale, grade 13, step 5), the estimated cost burden per grantee would be about \$948, with a total estimated cost burden for all 51 grantees of \$48,327.60 for the 2018 APR. These estimated costs represent a reduction from the 2017 APR, because the estimated number of hours to complete an APR would be reduced by 9 hours per grantee, or 28%. The estimated cost burden for the 2017 APR used a cost estimate of \$40.63 per hour (base pay scale, grade 13, step 5), with a total cost for all 51 grantees of about \$66,308.16, a savings of \$17,980.56 in the 2018 APR.

Estimated Hourly Costs per Grantee (2018 APR)	Estimated Hours of Burden Per Grantee (2018 APR)	Estimated Costs of Burden for 51 Grantees (2018 APR)	<i>Previous Estimated Hourly Costs per Grantee (2017 APR)</i>	<i>Previous Estimated Hours of Burden Per Grantee (2017 APR)</i>	<i>Previous Estimated Costs of Burden for 51 Grantees (2017 APR)</i>
\$41.20	23	\$48,327.60	\$40.63	32	\$66,308.16

A13. Provide an estimate of the total annual cost burden to the respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in items #12 and #14).

There are no additional costs to respondents or record-keepers resulting from the collection other than already reported in A12 and A14, including capital or start-up costs, or operation, maintenance, or purchase of services. In addition, those costs can be paid for with grant funds.

Total Annualized Capital/Startup Cost : 0
 Total Annual Costs (O&M) : 0
 Total Annualized Costs Requested : 0

A14. 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 OME program staff will conduct the data collection for the 2018 APR. There are currently 51 HEP grantees. Assuming that the response for each grantee takes on average about 45 minutes of program office staff time to review the performance reports, and that each hour of program office staff time costs the federal government about \$52.66 (2018 GS Washington locality scale, grade 13, step 5), the annualized federal cost will be about \$2,014.25 (hourly rate x .75 hour x 51 grantees). This represents a cost savings of \$619.90 for the federal government, as OME used approximately one hour of program office staff time to review each APR in 2017, at a cost of \$51.65 per hour (2017 GS Washington locality scale, grade 13, step 5), for an annualized cost of about \$2,634.15 (hourly rate x 1 hour x 51 grantees).

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I or in items 14 or 15 in the Part I; Information Collection Request form. 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).

OME has eliminated approximately 28% of the burden of the HEP APR collection by (1) eliminating submission of the GPRA 1 Documentation Form, as the sum total of this information is reported in APR Section A; (2) reducing the burden of APR Section B, Project Student Participant Information, as the eliminated data did not inform OME or grantees' decision-making as originally planned; and (3) reducing the burden of APR Section C, Project Services Information, as the eliminated data did not inform OME or grantees' decision-making as originally planned. There is a program change decrease of -235 annual burden hours and an adjustment increase of seven annual responses.

A16. For collections whose results will be published, outline the 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.

OME will begin collection of HEP APR data on approximately November 1 and end collection of HEP APR data on approximately November 16, annually. OME will verify and analyze the data between November 16 and July 1 of the subsequent year, and publish project profiles to ED.GOV by August 1 that include information on each project, including the project types and characteristics, federal funding, and GPRA performance data.

A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

The OMB number and expiration date will be displayed on the data collection form.

A18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

There are no exceptions to the certification statement.