

## **SUPPORTING STATEMENT**

### **FOR PAPERWORK REDUCTION ACT SUBMISSION**

Application for Grants under the Historically Black Graduate Institutions (HBGI) Program  
(CFDA # 84.031K)

#### **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. 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.

This request is for an extension of OMB approval of the application package for the Historically Black Graduate Institutions (HBGI) program, which expires in June 2019. The HBGI program provides financial assistance to establish or strengthen the academic resources, endowment building capacity, management capabilities and physical plants of Historically Black colleges and universities. Section 326 of Title III, Part B of the Higher Education Act of 1965, as amended (HEA) and the governing regulations (34 CFR Part 609) require collection of information identified in the application package. Links providing access to these authorities are provided in the application package.

The collection of information requested in the application is necessary to permit eligible institutions to apply for grants under the HBGI program. Further, legislation requires the collection of the data in order for the Secretary to determine awards for each institution and to evaluate each institution's plans for grant funds.

Section 326, Part B of Title III, and [34 CFR Part 609](#) (hyperlink provided) require that the Secretary collect Phase I formula data annually from the HBGIs in order to determine allotments to eligible institutions. Submission and collection of Phase II of the application process occur once at the beginning of each five-year cycle when the institution submits its five-year Comprehensive Development Plan (CDP).

The Higher Education Opportunity Act of 2008 increased by six (6) the number of HBGIs or Qualified Graduate Programs (QGP); therefore, the number of HBGIs is now 24.

**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.

Phase I of the application process requires that HBGIs provide numerical data to determine grant awards according to a Congressionally-mandated formula. After submitting the required Phase I data, the HBGI applicants are notified of their annual award amount based on the data received, aggregated and calculated from all eligible applicants.

In Phase II, the HBGIs submit a detailed project plan which includes legislatively allowable activities and measurable objectives designed to strengthen administration, financial management, academic programs, and instructional facilities. Program staff review the institutions' objectives to determine compliance with legislative intent, regulatory requirements, and sound educational principles.

**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 collection of information will be 100% electronic, thereby minimizing burden to the fullest extent possible.

**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.

Improved reporting and technological capability in the Federal Student Aid Office may make the collection of Pell Grant data available in the future without relying on the institutions to provide this information. At this time, we are unable to obtain the data through channels other than this application.

**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.

The collection of information 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.

All eligible HBGIs that seek assistance under this program must submit the required data that will be applied to a formula, which calculates individual awards for the eligible HBGIs and professional schools. If this information is not collected or collected less frequently, the programs cannot meet their statutory requirements and cannot make awards.

**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.

**8.** If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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.

We will publish the applicable 30-day Federal Register notice required for public comment. Additionally, annual consultations and reviews have occurred with representatives of the HBGIs regarding the data collection instrument, and instructions have been provided during annual technical assistance workshops for all grantees and during individual on-site visits.

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

No payments or gifts are provided.

**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>1</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

<sup>1</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)

of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

No confidential information is requested. Confidentiality is not assured.

**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.

No sensitive or personal information is solicited.

**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 average annual individual burden hours for this collection of information are 24 hours. We estimate 24 respondents. Applications will be submitted electronically. Therefore, we expect an estimated total of 576 burden hours.

Annual Burden Hours:

Phase I – 16 hrs – annually  
 Phase II – 40 hrs – once every five years

Estimated Individual Average Annual Burden Hours:

Year 1 56  
 Year 2 16  
 Year 3 16  
 Year 4 16  
 Year 5 16

---

120 hours per applicant over 5 years

120 divided by 5 years = 24 average annual burden hours per applicant.

24 applicants x 24 burden hours = 576

576 = total average annual burden hours for all applicants.

Of the 24 respondents, 17 are public institutions and seven are private, non-profit institutions. The total average annual burden hours for public institutions are: 408. The total average annual burden hours for private, non-profit institutions are: 168.

Average Estimate of Cost to Applicants:

|  |                |
|--|----------------|
| Professional staff<br>(1 personnel X 20 hours X \$62 per hour) = \$1,240 |                |
| Support staff<br>(1 personnel X 4 hours X \$50 per hour) = \$200         |                |
| Total Professional cost:   | \$1,240        |
| Total Support cost:  | <u>+\$ 200</u> |
| <b>Total:</b>  | <b>\$1,440</b> |

**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.

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

There are no start-up costs to respondents.

**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.

| <b>Estimated annual cost to the Federal Government</b>  |                 |
|---|-----------------|
| Development and Approval Process<br>(1 staff x 80 hours x \$62 per hour)                        | \$4,960         |
| Printing Phase I Formula Worksheets<br>(24 worksheets x \$1 per page)                           | \$24            |
| Monitoring of Grants<br>(600 hours x 1 staff x \$62 per hour)                                   | \$37,200        |
| World Wide Web Preparation for Posting<br>(4 hours x 1 staff x \$52 per hour)                   | \$208           |
| Staff time to review and approve funding recommendation<br>(40 hours x 1 staff x \$62 per hour) | \$2,480         |
| Staff time to generate, approve, and issue grant awards<br>(24 hours x 1 staff x \$62 per hour) | \$1,488         |
| Processing Applications<br>(5 hours per award x 24 awards x \$62 per hour)                      | \$7,440         |
| <b>Total estimated cost to the Federal Government</b>   | <b>\$53,800</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).

There are no program changes or adjustments.

**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 Department does not plan to publish the collected information.

**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.



We have no objections to this display of information.

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

There are no exceptions.