

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID)
Evaluation System**

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 Higher Education Opportunity Act (HEOA) Amendments of 2008 (20 USC 1140f-1140i) called for creation of model demonstration projects supporting access into higher education for students with intellectual disabilities (ID).

http://www.law.cornell.edu/uscode/html/uscode20/usc_sup_01_20_10_28_20_VII_30_D_40_2.html

The Department of Education (ED) awarded the first round of grants under the Transition Programs for Students with Intellectual Disabilities Program (TPSID) in fiscal year 2010. In September 2015, ED's Office of Postsecondary Education (OPE) awarded a new round of TPSID grants to 25 institutions of higher education (IHE) in 23 states. The grant application for TPSID grantees under CFDA #84.407A indicated:

...that in accordance with Section 767(d)(5) of the HEA, grantees would be required to participate in evaluation activities conducted by the coordinating center established by section 777(b) of the HEA. As part of these reports and evaluation activities, grantees will be expected to work closely with the coordinating center to develop performance measures most closely aligned with activities that promote the successful transition of students with disabilities into higher education...

It further stated that TPSID grantees would be asked to annually collect and provide 11 Government Performance and Results Act (GPRA) performance measures to the Coordinating Center.

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

The requested collection would enable the Department to continue to collect these data, as current OMB approval of this collection expires in July 2019. The type of collection is a revision and it is not associated with rulemaking.

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.

OPE awarded one (1) Model Comprehensive Transition and Postsecondary Programs for Students with Intellectual Disabilities Coordinating Center (TPSIDCC) to build a valid and reliable knowledge base around program components.

The TPSIDCC will establish a uniform dataset across all TPSID sites (including both grantees and partner sites) to ensure consistency in collection of information comprised by the 11 required GPRA measures. To coordinate the data collection, the Coordinating Center intends to collect these program data from TPSID and partner site program staff via an online, secure, data management system.

The TPSIDCC is also charged with conducting an evaluation of the 25 TPSID programs. The Coordinating Center's evaluation effort intends to address the following evaluation questions:

1. What academic, independent living, career development, and social opportunities are TPSIDs providing to participants enrolled in their programs?
2. What are the outcomes for participants who attend TPSID programs?
3. How do participants' outcomes in TPSIDs vary based on program characteristics?
4. How have the TPSIDs' activities changed over the project period?
5. What kinds of internal and external collaboration activities are staff from TPSIDs conducting?
6. What existing campus resources / college systems do students served by TPSIDs use?
7. What type of credential is each TPSID offering and how are TPSIDs tracking progress towards this credential?
8. What kinds of evaluation activities are the TPSIDs conducting?
9. What funding mechanisms are being used by TPSIDs and students?
10. What strategies are the TPSIDs using to enhance sustainability of the TPSID program?

The collection will support development of an annual program evaluation report generated by the Coordinating Center staff reflecting a descriptive summary of grantee activities.

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.

All data will be collected in a secure online database that was created using software purchased from Quickbase (quickbase.com). All data entry, tracking, and retrieval will be electronic. A web-based data collection system was determined to be the best approach for several reasons:

1. This system allows TPSIDs and their partners to fill in data as they become available from any computer with internet access.
2. Given the longitudinal nature of the project, a web-based evaluation system reduces burden by allowing TPSID and partner site staff to review the previous year's data and make updates as needed, rather than entering a full set of annual data without reference to previous entries.
3. Quickbase, which supports a relational database platform, reduces respondent burden by storing data that will need to be called on by TPSIDs for multiple records rather than requiring them to continuously enter similar information into many records.
4. This system facilitates the use of nested levels of analysis (i.e. each TPSID and associated partner program).
5. This system provides a secure mechanism for transmittal of data.
6. The system is available for TPSIDs to both enter and retrieve data on their programs, allowing them to use this system to facilitate other reporting requirements such as their Annual Performance Reports.

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.

Comparable information about these programs is not available from any other source. No existing data systems (e.g. Integrated Postsecondary Education Data System (IPEDS)) gather information regarding higher education programs and services specifically for students with intellectual disabilities. This collection is based upon statute and is ED program-specific (OPE/TPSID).

In order to obtain continued funding each year from OPE, each respondent must provide these data based upon their grant agreement. The role of the proposed data collection system is to standardize the data collection process to make it more efficient and useful both to the TPSIDs and to OPE. Moreover, the system was designed to facilitate collection, storage, and retrieval of data in support of TPSIDs' required Annual Performance Reports to the Department of Education.

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.

No small businesses or other small entities are involved in this effort.

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.

Program statute requires this annual data collection. The goal of OPE's TPSID Program is to promote the successful transition of students with intellectual disabilities into higher education and to enable institutions of higher education (or consortia of institutions of higher education) to create or expand high quality and inclusive model comprehensive transition and postsecondary programs for students with intellectual disabilities.

Without annual centralized data collection, respondents would face greater annual performance reporting challenges and OPE would not be able to identify the characteristics and attributes of these emerging postsecondary education programs or of this traditionally underserved population of college students in higher education.

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 involved with this data collection effort.

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 currently approved tool has been reviewed by representatives from responding institutions of higher education as well as by the National Center for Education Statistics and OPE. 60 day and 30 day notices will be published in the Federal Register for public comment as required.

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 being made 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 PII will be collected. All individual records will have system-generated numeric identification numbers that are not related to any direct or indirect PII. Only approved TPSID model demonstration project staff and partner site staff (as assigned by the TPSID Principal Investigator) will have access to the system.

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.

No questions of a sensitive nature are included.

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.*

A total of 50 institutions of higher education (the 25 OPE grantees plus 25 partner sites) are expected to enter data in the system annually. Since the time required to enter data in the system is heavily dependent on the size of the program, the time required will vary considerably from school to school. Based upon previous use of this approved collection and reductions in burden through instrument changes and database automation, we estimate 1.8 hours to complete the demographic, staffing, and partnership data entry and 1.2 hours per enrollee. Based on expected enrollment projections, we estimate that collectively the 50 responding institutions of higher education and satellite campuses will have an average total enrollment of 850 students each year. Therefore, the expected data entry time for each year is 1,020 hours to aggregate program data

on enrollees (1.2 x 850), and 90 hours to aggregate additional program data (1.8 x 50) for a total yearly data entry time across all respondents of 1,110 hours.

Cost estimate for data entry is \$33.80 per hour. Based on that average rate, the annual cost for this collection for all respondents is \$37,518 (1,110 hrs. x \$33.8 /hr.).

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 anticipated 50 responding institutions of higher education should be able to complete this data reporting using existing computer equipment. No additional cost burden beyond the staff resources is expected to be associated with this data collection.

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 estimated cost to the federal government for this data collection over the next three years is **\$668,886**, distributed as outlined in Table 1.

Table 1: Cost to federal government

Year 1	2019	\$222,962
Year 2	2020	\$222,962
Year 3	2021	\$222,962
Total over 3 years		\$668,886

A more detailed tabulation of costs is provided in Table 2. All personnel costs are associated with staff from the TPSID Coordinating Center, which is funded by a grant from ED, and are related to the data collection and analysis required by this information collection.

A variety of factors impacted the increased federal cost. First, staff salaries reflect the University of Massachusetts Boston cost of living increases which is 2-3% annually. Additionally, the previous calculation (2015) did not include the UMASS Boston required fringe rate for staff which has been added to the 2019 projected costs. The UMB fringe benefits rate is set at 35.48% of salary. In addition, the payroll tax rate is 2.43% of compensation for regular and contract employees and Worker's Compensation is assessed at .26% of salary expenses. Health and Wellness tax is charged at a rate of \$33 per pay period per benefitted FTE. The University's fringe benefits rates are set based on an agreement between the Commonwealth of Massachusetts and the U.S. Department of Health and Human Services. The 2019 calculations reflect the fringe rate cost associated with personnel. Second, the quarterly cost of the Quickbase platform which hosts the data network where all data from TPSIDs is entered and housed increased from \$3009/quarter to \$5930/quarter in 2018. The cost of this increase is far less than the potential cost to transfer the evaluation system to a different platform. Additionally, switching platforms and user interfaces would increase the respondent burden drastically if a new platform was adopted.

Table 2: Specific tabulation of costs

.5 FTE Research Associate III	44,910
.2 FTE Research Associate III	16,472
.1 FTE Research Associate III	7,052
.1 FTE Database Manager	4,504
.2 Marketing and Communication	23,022
.2 Research Assistant	3,547
.2 FTE Principal Investigator	25,303
.1 FTE Co-Principal Investigator	14,983
Fringe	51,449
Consultant fees	8,000
Quickbase service at \$5930/quarter	23,720
<i>Total costs per year</i>	222,962

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).

This is a revision of a currently approved collection. Compared to the current collection, the burden has been significantly reduced due to instrument revision. Revisions included reducing or eliminating questions, eliminating infrequently used response options, and automating elements of data entry. These revisions resulted in a reduction of 52.5 hours and \$1774.75 in costs annually for respondents. However, due to a small increase in the number of respondents since this collection was last reviewed, the total burden hours for this collection have increased slightly.

The reduction in burden for student data reporting from 1.25 to 1.2 hours per student record is the result of consolidating unpaid and career development experience (CDE) and paid employment into one section. Previously, CDE and paid employment were reported on separate areas of the instrument and in separate areas of the Data Network. Consolidating these data into one section reduces the amount of navigation end users need to do for each record. We also believe representing these similar, and often related, activities on the same form reduces burden by allowing end users to consider all career development activities at one time.

The reduction in burden for program data from 2 to 1.8 hours per program record is the result of eliminating questions from the program instrument. In some cases, NCC staff determined that some previously included data points were not contributing significantly to the evaluation of TPSID program. In other cases, questions were removed that did contribute significantly to the evaluation, but do not need to be reported by the TPSIDs, i.e. publicly available data. These data points include, but are not limited to, whether or not a school has on campus housing, whether a school offers 2- or 4-year degrees or both, whether a school has a Comprehensive Transition Program (CTP). NCC staff now gather and enter these data to reduce burden on TPSID staff.

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.

Each year after the data submission deadline, Coordinating Center staff will summarize the evaluation data provided for the preceding year; all data will also be summarized at the conclusion of the five-year project. Data will be analyzed using SPSS and will consist primarily of descriptive and frequency analyses. These data summaries will be provided to OPE in an annual report and published on the project web site.

Table 3 indicates the original time schedule of project activities for the collection period. However, since we do not yet have OMB approval this schedule may need to be altered.

Table 3: Project Activities Schedule (Fiscal Year beginning Oct. 1)

Activity	2019				2020				2021			
	Q1	2	3	4	1	2	3	4	1	2	3	4
Collection public comment	X	X										
OMB review			X									
Data collection				X	X	X	X	X				
Closeout of year's data collection & data cleaning/follow-up			X				X					
Descriptive analyses				X				X				
Write & disseminate annual report					X				X			
Final report									X			

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 are not seeking approval to not display the expiration date for OMB approval.

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

There are no exceptions.