

Annual Performance Report for Grants under the Ronald E. McNair Postbaccalaureate Achievement Program

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 Department of Education (Department) is requesting approval of a revision of a currently approved collection. The Ronald E. McNair Postbaccalaureate Achievement (McNair) Program Annual Performance Report (APR) will expire on November 30, 2019 (OMB No. 1840-0640).

The McNair Program is authorized by Title IV, Part A, Subpart 2, Section 402E of the Higher Education Act of 1965, as amended (P.L.110-315); the program regulations in 34 CFR Part 647; and the Education Department General Administrative Regulations (EDGAR), Parts 74, 75, 77, 79, 82, 85, and 86. The McNair Program authorizing statute and regulations for this collection are available via the following URL link: <http://www2.ed.gov/programs/triomcnair/legislation.html>.

Through a grant competition, McNair Program funds are awarded to institutions of higher education to prepare eligible participants for doctoral studies through involvement in research and other scholarly activities. Participants are from disadvantaged backgrounds and have demonstrated strong academic potential. Institutions work closely with participants as they complete their undergraduate requirements. Institutions encourage participants to enroll in graduate programs and then track their progress through to the successful completion of advanced degrees. The goal is to increase the attainment of Ph.D. degrees by students from underrepresented segments of society.

The obligation to respond to this collection is required to obtain or retain benefit under Title IV, Section 402E, of the Higher Education Act of 1965, as amended (Public Law 110-315), and the program regulations in 34 CFR Part 647; and sections 75.590 and 75.720 of the Education Department General Administrative Regulations (EDGAR) permit the collection of this information. The respondents under the collection are institutions of higher education or combinations of those institutions.

The information submitted in the annual performance report is used to meet several regulatory and statutory requirements.

Prior Experience (PE) Points

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

First of all, the data collected via the McNair APR is used to assign prior experience points as mandated by the McNair Program authorizing statute, Title IV, Part A, Subpart 2, Chapter 1, Section 402A(f)(3)(D) of the Higher Education Act of 1965, as amended, which states:

“For programs authorized under section 402E, the extent to which the entity met or exceeded the entity’s objectives for such programs regarding—

- (i) the delivery of service to a total number of students served by the program, as agreed upon by the entity and the Secretary for the period;*
- (ii) the provision of appropriate scholarly and research activities for the students served by the program;*
- (iii) the acceptance and enrollment of such students in graduate programs; and*
- (iv) the continued enrollment of such students in graduate study and the attainment of doctoral degrees by former program participants.”*

The calculation of prior experience points is done on an annual basis using the data the project submits for the reporting period. As such, during a competition for new awards, the prior experience points are added to the average of the field readers’ scores to derive a total score for an application. A slate of all applicants is developed on the basis of the total scores of the applications. Funding recommendations and decisions are based on the rank order of applicants on the slate. Therefore, the assessment of prior experience points is a crucial part of the overall application process.

Evaluation of Substantial Progress

Secondly, during non-competitive years, the reports are used to verify that grantees are making substantial progress toward the achievement of approved objectives prior to issuing continuation awards.

Government Performance and Results Act (GPRA)

Thirdly, the Department is committed to continually improving its management of programs and improving the educational outcomes of students. Improvements are guided by monitoring and assessing performance, improving the data used for these assessments, collaborating with stakeholders, implementing recommendations, and re-assessing performance. Providing data to the public is a key element in promoting improvement and collaborating with stakeholders. Therefore, to meet these goals the APR collects aggregate and quantifiable data needed to respond to the requirements of the Government Performance and Results Act (GPRA). The performance outcomes that are measured are:

- the acceptance and enrollment of project participants in graduate study,
- the continued enrollment of project participants in graduate study, and
- the cost per graduate school enrollment.

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.

As mentioned above, the Department uses the data collected to: (a) determine the number of prior experience points to be awarded for the purpose of awarding the grant, (b) evaluate substantial progress to aid in compliance and monitoring as well as funding, (c) respond to the requirements of GPRA, and (d) respond to the statutory requirement regarding reports to Congress on program outcomes.

In addition, the annual performance reports are used to collect programmatic data for purposes of annual reporting; budget submissions to OMB and to Congress; Congressional hearing testimonials;

Congressional inquiries; and responding to inquiries from higher education interest groups and the general public.

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 data collection method allows the grantees to use computerized data systems to collect, retrieve, and report the requested information. A Web-based software application has been developed for grantees to enter the data online and submit the entire report via the Internet. The McNair projects have been submitting the currently approved annual performance report via the Internet for the past eight years. Since project year 2014-15, 100% of the current grantees submitted via the Internet. The web site meets the Department's security standards; that is, it is secured to ensure the data are only seen by authorized individuals and are protected from network hackers.

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 report is unique to each respondent, no duplication exists. There is no other collection instrument that is available to collect the information that is being requested. The data collected in the APR are fundamental to the McNair program.

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.

This information collection 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.

The collection of performance reports is required annually. Collection of information on a less frequent basis is not feasible. These reports are used to determine if the grantee is making satisfactory progress in meeting the goals and objectives proposed in its initial application, prior to awarding continuation funding. In addition, the information is needed to award prior experience points to grantees. Without this data collection, the Federal TRIO Programs will be unable to award non-competing continuation awards, use the data to assess the prior experience provision of the authorizing statute, respond to the GPRA reporting requirements and efficiency measures requirements, respond to the statutory requirement regarding the reporting of outcomes data to Congress and develop improved policies for program administration.

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.*

With one exception, no information will be collected in the manner covered under any of the special circumstances outlined. The exception is that respondents are required to retain participant records for a period of ten years. In order to assess the impact of the program services on participating students' academic progress, grantees are required to track the academic progress of all prior-year participants until they attain a doctoral degree, or until they are inactive in the pursuit of their academic objective for five 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 has published a 60-day Federal Register notice as required by 5 CFR 1320.8(d) to solicit comments on the information collection prior to submission to OMB (84 FR 37855). The Department has summarized public comments received in response to that notice and described actions taken by the agency in response to these comments.

A separate 30-day Federal Register notice will be published to solicit public comment on the new APR form. The Department will summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

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

The Department does not provide any payments 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.

The Department's disclosure policies adhere to the provisions of the Privacy Act – PL 95-379, 5 USC 552a. There is no assurance of confidentiality with respect to grant-required reports; however, grantees are instructed to ensure that program participants are informed of their rights under the Privacy Act with respect to the disclosure of social security numbers. A disclosure statement is provided to students at intake or involving other activities that occur during their time with the McNair project.

Because the APR requests personal and confidential information on project participants, the secured Web site meets the Department of Education's data security standards for sensitive data, including password and site access procedures. Further, to ensure that the data is accessible only to authorized individuals and protected from unauthorized uses, a grantee must submit the participant level data via the Web application; under no circumstances should a grantee transmit the data to the Department or the APR Help Desk via e-mail.

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 annual performance report form does not include questions about sexual behavior and attitudes, religious beliefs or other items that are commonly considered sensitive and private.

12. Provide estimates of the hour burden of the collection of information. The statement should:

²Requests 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).

- *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 burden hours for this collection are 11 hours. We estimate approximately 187 respondents x 1 report each.

Estimated Burden Hours			
Estimate	Public Sector	Private, Non-profit Sector	Total
Estimated number of respondents	115	72	187
Estimated preparation time	11	11	11 hours
Total estimated burden hours	1,265	792	2,057

Estimated Burden: 11 hours per respondent—Number of hours [preparation time] divided by the total number of respondents equals estimated burden hours.

The burden hours allotted for recordkeeping and reporting burden includes activities related to the update and review of data, responses to inconsistencies in the data reported, and data entry into the web portal.

Most of the costs of this data collection are those of the Federal Government, since the respondents are project staff paid for the most part with Federal grant funds. Nonetheless, the annual cost to the grantee to respond to this data collection is estimated as follows:

Estimated annual costs to respondents	
Professional (187 personnel X 10 hours @ \$37 per hour)	\$69,190.00
Clerical (187 clerical X 1 hour @ \$17 per hour)	\$3,179.00
Total estimated costs to respondents	\$72,369.00

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 : _____

There are no other costs to the respondents. Grantees are required by program regulations to collect and maintain this information. The costs to transmit the data electronically via the Web are customary and usual business practices.

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 in collecting, aggregating and disseminating the information.

Estimated annual cost to the Federal Government	
Federal Professional Staff Cost	Cost
Professional staff to develop clearance package (GS-14 employee) 45 hours @ \$55.00 per hour	\$2,475.00
Overhead cost related to facilities, administration, and other indirect costs plus accrual of leave and fringe benefits @ 50% of salary of \$2,475	\$1,238.00
Other Department staff to review and approve the request: (GS 15 employee) \$65 per hour X 14 hours = \$910.00 (GS 14 employee) \$55 per hour X 20 hours = \$1,100.00 Overhead costs: \$2,010.00 X 50 percent = \$1,005.00	\$3,015.00
OMB Review (estimated) 12 hours x \$47.00 per hour Overhead costs: \$564 X 50 percent	\$564.00 \$282.00
Other Administrative Costs	
Annual Web Development —Annual contract cost for development of APR Web application, Web-based data collection, Help Desk support, data processing, and grantee PE reports	\$113,999.00
Annual Data Analysis —Analyses of data and preparation of national summary and individual project reports (contractor costs)	\$147,000.00
Total Annual Government Cost	\$268,573.00

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 number of respondents has increased from 158 to 187 based on the number of grantees funded in the most recent McNair competition for new awards. The total annual burden hours have increased accordingly. In addition, for security and privacy reasons, the Department will no longer collect Social Security numbers (SSNs) as part of the APR. The Department has established unique identifiers (case numbers) to replace the SSNs used in the past. Grantees are required to replace the existing SSNs with

the case numbers provided by the Department. Burden per respondent (11 hours) has not changed since the previous clearance.

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 the collected information will not be published.

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.

B. Collection of Information Employing Statistical Methods statement.

The collection of information does not employ statistical methods.