

**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 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.**

This application is being submitted for reinstatement without changes in anticipation of a possible grant competition in FY 2020. The program is authorized under Title III, Part A, Section 319 (84.031X) of the Higher Education Act (HEA) of 1965, as amended (<http://legcounsel.house.gov/Comps/Higher%20Education%20Act%20Of%201965.pdf>). This program awards discretionary grants to eligible institutions of higher education so that they might increase their self-sufficiency by improving academic programs, institutional management, and fiscal stability (<http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.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.**

This collection of information is gathered electronically by the U.S. Department of Education (Department) for the purpose of obtaining programmatic and budgetary information needed to evaluate applications and to make funding decisions based on the authorizing statute and the published selection criteria.

**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 application process is electronic. Applicants submit their applications using the government-wide Grants.gov system. The applications transfer to the Department's G5 system. Program staff use the G5 system to set up the panels for the competitive reading, and the peer reviewers will use G5 to read and score the applications.

**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.**

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

Information submitted in this application is unique to each respondent; no duplication exists.

**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 collection of information does not involve small businesses or 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 Department uses this information to make new multi-year grant awards. If this information is not collected or collected less frequently, the Department would not be able to evaluate applications and make funding decisions based on the provisions of the authorizing statute. Data is only collected when the program appropriation amount is enough to fund new 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 as outlined in #7 of the instructions.

**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.**

A 30 day notice for public comment will be published in the Federal Register as required. Program staff will respond to any questions or comments resulting from the publication of the information collection in the Federal Register as required by 5 CFR 1320.8(d).

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

The Department will not provide 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.<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.**

The purpose of the collection is to evaluate applications and make funding decisions based on the provisions in the authorizing statute and EDGAR. The information collected is not of a personal and confidential nature (i.e., no personally identifiable information is being collected), and no assurance of confidentiality is provided. This collection does not have a Systems of Record Notice or Privacy Impact Assessment.

**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**

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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)

**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.**

Questions of a sensitive nature are not included in this information collection.

**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.**

Total estimated burden hours for this collection of information are 2,000 annually. We estimate 50 respondents at 40 hours per response. Applications will be submitted electronically. Total estimated costs to respondents are \$55,500.

Information Activity or IC (with type of respondent)	Number of Respondents	Average Burden Hours per Response	Total Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Data processing and generation of application (professional)	50	35	1,750	\$30 per hour (professional)	\$52,500
Filing and maintaining application materials (clerical)	50	5	250	\$12 per hour (clerical)	\$3,000
<b>TOTAL</b>	50	40	2,000		\$55,500

**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 start-up costs.

**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>Cost to the Federal Government</b>	
<i>Cost to develop clearance package</i>	
Professional staff member to develop and revise clearance package (80 hrs. x \$56 per hour = \$4,480) (Overhead cost: \$4,480 x 50 percent = \$2,240)	\$6,720

Professional staff member for final review and approval (16 hrs. x \$56 per hour = \$896) (Overhead cost: \$896 x 50 percent = \$448)	\$1,344
<b>Estimated Total</b>	<b>\$8,064</b>
<i>Cost for Federally-supervised review of applications – Estimate of 50 applications</i>	
Readers reviewing applications @ 10 apps. per panel, 3 readers per panel, 5 panels (Total of 15 readers @ \$1,100 each)	\$16,500
Processing applications – staff (1 staff x 40 hours x \$56 per hour = \$2,240) (Overhead cost: \$2,240 x 50 percent = \$1,120)	\$3,360
Contractor logistical support for workshops, application processing, field reading and slate preparation	\$36,000
Staff time for conducting supervised review (3 week review x 1 staff to chair each panel) (5 staff x 120 hours = 600 hours x \$56 per hour = \$33,600) (Overhead cost: \$33,600 x 50 percent = \$16,800)	\$50,400
Staff time to review and approve funding recommendation (9 awards x 1 hour per award x \$56 per hour = \$504) (Overhead cost: \$504 x 50 percent = \$252)	\$756
Staff time to generate, approve, and issue grant awards. (2 hours per award x 9 awards = 18 hours) (1 staff x \$56 per hour x 18 hours = \$1,008) (Overhead cost: \$1,008 x 50 percent = \$504)	\$1,512
<b>Total Estimated Cost to Government (competition year)</b>	<b>\$116,592</b>
<i>Annual Monitoring Cost</i>	
(19 hours per award x 9 awards = 171 hours) (1 staff x \$56 x 171 hours = \$9,576) (Overhead cost: \$9,576 x 50 percent = \$4,788)	\$14,364
<b>Total Annual Government Estimated Cost</b>	<b>\$130,956</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).**

Since this is a reinstatement, all burden hours are new and considered a program change.

**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.**

There are no plans to publish the results. The information collected will be used for internal purposes only.

**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.**

There is no request to omit the OMB expiration date. The Department will display the expiration date for the OMB approval on the form, as required.

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

There are no exceptions to this certification statement.