

Supporting Statement for  
U.S. Department of Education  
Grant Application Form for  
Project Objectives and Performance Measures Information  
OMB Control Number 1894-0017

**1. Explain the circumstances that make the collection of information necessary. Include identification of any legal or administrative requirement that necessitates the collection.**

The U.S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information serves as a precursor to the U.S. Department of Education Grant Performance Report Form (ED 524 B) in which project objectives, measures, and targets will be entered by applicants at the time that grant applications are entered in Grants.gov. The entered project objectives, measures, and targets will then be retrieved by G5 from Grants.gov and will be populated into the corresponding ED 524B, thereby, eliminating the need for those grantees that submit their 524Bs in G5 to reenter their objectives, measures, and targets at the time that they complete the 524B for submission of interim or final performance reports.

The ED 524B and instructions are used by many Education Department (ED) discretionary grant programs to enable grantees to meet ED deadline dates for the submission of performance reports. Recipients of multi-year discretionary grants in these programs must submit interim performance reports, usually annually, for each year that funding has been approved in order to receive a continuation award. The interim performance report should demonstrate whether substantial progress has been made toward meeting the approved goals and objectives of the project. ED program offices may also require recipients of “front loaded” grants that are awarded funds for their entire multi-year project up-front in a single grant award to submit the ED 524B on an interim basis, usually annually. In addition, ED program offices that use the ED 524B require grantees to submit the form as a final performance report to demonstrate project success, impact and outcomes.

In both the interim and final performance reports, grantees are required to provide data on established performance measures for the grant program (e.g., Government Performance and Results Act measures and program measures established by the ED program office for the particular grant competition) and/or on project performance measures that were included in the grantee’s approved grant application.

Performance reporting requirements are found in 2 CFR 200.328 of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for

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Federal Awards, and in 75.118, 75.253, and 75.590 of the Education Department General Administrative Regulations (EDGAR).

The U.S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information has approval through June 30, 2020 and we are requesting an extension of this approval.

**2. Indicate how, by whom, how frequently and for what purpose the information is to be used.**

As an interim (usually annual) performance report, ED uses the information submitted by grantees in the ED 524B to evaluate grantee performance and progress, and to determine whether non-competing continuation funds should be awarded in multi-year grants. Only grantees that can demonstrate that they are making substantial progress (or, if not, have submitted an acceptable plan for meeting their objectives in subsequent budget periods) are eligible for continuation funding.

ED uses the information submitted on the ED 524B as a final performance report to determine whether grantees whose projects have ended have achieved project objectives and met or exceeded the Government Performance and Results Act and/or other program and project performance measures and grant requirements. This determination enables ED to assure that grants can be closed out in compliance.

As previously stated, the U.S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information serves as a precursor to the ED 524B in which project objectives, measures, and targets will be entered by applicants at the time that grant applications are submitted in Grants.gov. The submitted project objectives, measures, and targets will then be retrieved by G5 from Grants.gov, and will be pre-populated into the corresponding 524B in G5, thereby, eliminating the need for those grantees that submit their 524Bs in G5 to reenter their objectives, measures, and targets at the time that they complete the 524B for submission of interim or final performance reports.

Even for those ED program offices that do not require the G5 submission of the 524B, benefits to having the U.S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information completed in Grants.gov will be realized by ED staff. By virtue of the related G5 enhancement, ED staff will be able to retrieve, in report form from G5, applicant entered project objectives, measures, and targets that are stored in G5 based on what the applicant submitted in Grants.gov. The report resulting from this G5 enhancement has been deemed a beneficial monitoring tool for ED program staff as they will be able to retrieve from G5 grant objectives, measures, and targets in

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report form for the purpose of monitoring grantee progress throughout the life of the associated grants.

3. **Describe any consideration of information technology use to reduce burden, as well as any technical or legal obstacles for reducing burden.**

Applicants for ED grant funding will complete the U.S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information electronically in Grants.gov. As such, the burden time for completing the 524B will be reduced for those grantees that are required to complete the 524B in G5, since as previously mentioned, G5 will retrieve this information from Grants.gov and will populate it into the corresponding ED 524B.

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 2 above.**

In response to ED Notices Inviting Applications for Funding (NIA), grant applicants must, in their grant applications, identify project objectives, and must include GPRA measures established for reporting to Congress under the Government Performance and Results Act, program measures established by the ED program office for the particular grant competition, and any project-specific performance measures that the applicant has established to meet its project objectives. Targets for quantitative grant measures are also required to be identified. There does not exist, as present time, a Grants.gov form that will allow for this specific information to be entered exclusively for the purpose of transferring the information to the 524B, or for the purpose of making the objectives, measures and target data available for download in report form.

5. **If the collection of information has a significant impact on a substantial number of small businesses or other small entities, describe the methods used to minimize burden.**

Under EDGAR regulations, all requirements for small entities are minimized.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

EDGAR, 34 CFR Part 75.253, requires that substantial progress toward meeting the objectives in the approved application is a requirement for a grantee receiving continuation funds. The ED 524B is used on an interim (usually annual) basis as one of the primary monitoring tools for determining whether grantees have made substantial progress. The implementation of the U.S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information will enable applicants to enter project objectives, performance measures, and measure targets in Grants.gov at the

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time the application is being completed in Grants.gov. Through a G5 enhancement, the information submitted in Grants.gov will be retrieved by G5 from Grants.gov, and will be pre-populated into the corresponding ED 524B; thus, grantees that are required to complete the 524B form in G5 will not have to re-enter this information into the 524B at the time that they complete progress information for interim and final performance reporting in the 524B. The consequences of not implementing the U .S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information are simply that grantees that complete their 524Bs in G5 will not encounter the time savings afforded by the proposed form, and they will continue to enter project objectives, performance measures, and measure targets at the time that they are completing their 524Bs for interim and final performance reporting.

7. **Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.**

The information will not be collected in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

8. **Describe any effort to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format, and on the data elements to be recorded, disclosed, or reported.**

A 60 day notice was published in the Federal Register on February 10, 2020 (85 FR 7539). Nonsubstantive comments were received that did not result in changes. A 30-day notice will be published. It is anticipated that a minimal number of comments will be received in response to any such public comment period, since the proposed electronic form reduces the burden associated with completing the 524B.

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

There will be no payments or gifts to respondents other than the allocation of Federal funds that result from the information collection.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

ED is not requesting any confidential information in this collection; therefore, no assurances of confidentiality are required.

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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.**

This information collection does not include information of a sensitive nature.

12. **Provide estimates of hour burden of the collection of information and analyzed costs to the respondents.**

Total Annual Burden Hour Calculation for the U.S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information:

ED estimates that over the next three years, approximately 5,976 applicants each year will be required to complete the U.S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information in Grants.gov (estimate based on actual FY 2019 applications submitted for funding). The burden hours per form is estimated to average 5 hours per applicant and reflects the estimated time that applicants will paste into the proposed Grants.gov form the grant application objectives, measures, and targets.

Burden Hours for U.S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information: 5 hours/application X 5,976 applications/year = 29,880 total annual burden hours.

Total Annual Cost Burden to Respondents for the U.S. Department of Education Grant Application Form for Project Objectives and Performance Measures Information:

29,880 total burden hours x \$25/hour = \$747,000

13. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

N/A

14. **Provide estimates of annualized cost to the Federal Government.**

There are no annual costs to the Federal Government.

15. **Explain reasons for change in burden, including the need for any increase.**

The total number of respondents had decreased from 6,349 to 5,976 accounting for the -1,865 adjustment in burden hours. Costs associated with this ICR have been corrected.

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16. **For collections of information whose results are planned to 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.**

No plans exist to publish the results of this information collection.

17. **Seeking approval not to display the expiration date for OMB approval of this information collection.**

We are not seeking approval to not display the expiration date for this information collection.

18. **Explain each exception to the certification statement identified in Item 19.**

There are no exceptions to the certification statement.

- B. **Collections of Information Employing Statistical Methods.**

The results of this information collection will not be published for statistical purposes.