

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. 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, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

Under Titles III, V, and VII of the Higher Education Act of 1965 (HEA), as amended, discretionary grants are awarded to eligible institutions of higher education and organizations (Minority Science and Engineering Improvement Program (MSEIP) Title III, E only) to support improvements in educational quality, institutional management, and fiscal stability. The office of Institutional Service (IS) is authorized to award one-year planning grants and five-year development grants to institutions with low per-student expenditures that enroll large percentages of minority and financially disadvantaged students. The communities served by Titles III, V, and VII of the HEA include: Asian American and Native American Pacific Islander-Serving Institutions (AANAPISI); Alaska Native and Native Hawaiian-Serving Institutions (ANSI, NHSI); Historically Black Colleges and Universities (HBCU); Historically Black Graduate Institutions (HBGI); Hispanic-Serving Institutions (HSI); Native American-Serving Nontribal Institutions (NASNTI); Predominantly Black Institutions (PBI); American Indian Tribally Controlled Colleges and Universities (TCCU); and other institutions that serve a significant number of minority and financially disadvantaged students and have low core expenditures per student.

There are major forces that continue driving the Annual Performance Report (APR): (1) the need to improve the quality and effectiveness of our program monitoring efforts; (2) the need to provide more reliable and valid data for the Government Performance and Results Act (GPRA); (3) the need to evaluate grantee and program effectiveness; (4) improving the effectiveness of evidence-building efforts, and (5) capacity building efforts toward a Titles III, V, and VII community of practice. The Office of Inspector General (IG) has identified repeatedly these needs as areas that the Department of Education (ED) should resolve. For the past several years, the Department has been focused on addressing these areas. The data elements for all grant programs that use this APR continue with no significant changes. However, the APR has been streamlined since it was last approved, resulting in a slight reduction in burden hours per response. Therefore, we are requesting a reinstatement with change of information collection 1840-0766, which expired in July 2020.

This APR, designed specifically for Titles III and V programs (as well as Title VII part A, Master's Degree Programs at Historically Black Colleges and Universities and Master's Degree Programs at Predominantly Black Institutions), captures the diverse and unique properties of grant projects, as well as overall program accomplishments. The APR casts a wide net over the Titles III, V, and VII programs, but is flexible enough to address all the specific needs of each of the programs. Titles III, V, and VII projects are so unique, and the institutional profiles are so diverse, that a rigid system of measurement would be inappropriate. The APR allows grantees to measure their progress against their institution's own baseline data, select their areas of emphasis, and provide additional qualitative information in narrative form if they wish to do so.

The APR uses a standard format, making it far easier to elicit specific responses, aggregate data and compare responses within the entire grantee pool or across years. Albeit narrative responses are allowed, our grantees' time is more efficiently spent collecting and entering data that, for the most part, already exists in their institution's records or as a result of their project evaluation plan (which is part of their original grant application). The APR incorporates the summative and formative independent grant evaluations and provides IS program officers with data that heretofore was not captured electronically and therefore not aggregated and easily analyzed in a systematic manner.

Authorization for the collection of information can be found in the following sections of the HEA, by program CFDA:

- 84.031A, [20 U.S.C. 1057-1059b](#)
- 84.031B, [20 U.S.C. 1060-1063c](#)
- 84.031C, [20 U.S.C. 1067q \(b\) \(2\) \(B\)](#)
- 84.031D, [20 U.S.C. 1067q](#)
- 84.031E, [20 U.S.C. 1067q](#)
- 84.031F, [20 U.S.C. 1057-1059b](#)
- 84.031K, [20 U.S.C. 1063b](#)
- 84.031L, [20 U.S.C. 1059d](#), [20 U.S.C. 1067q](#)
- 84.031M, [20 U.S.C. 1102-1102c](#)
- 84.031N, [20 U.S.C. 1059d](#)
- 84.031P, [20 U.S.C. 1057-1059b](#)
- 84.031R, [20 U.S.C. 1067q](#)
- 84.031S, [20 U.S.C. 1101-1101d](#); [1103-1103g](#)
- 84.031T, [20 U.S.C. 1059c](#)
- 84.031V, [20 U.S.C. 1067q](#)
- 84.031W, [20 U.S.C. 1059d](#)
- 84.031X, [20 U.S.C. 1059f](#)
- 84.120A, [20 U.S.C. 1067-1067k](#)
- 84.382A, [20 U.S.C. 1067q](#)
- 84.382B, [20 U.S.C. 1059d](#), [20 U.S.C. 1067q](#)
- 84.382C, [20 U.S.C. 1067q](#)
- 84.382D, [20 U.S.C. 1136b](#)
- 84.382G, [20 U.S.C. 1136a](#)

Additional references can be found in the Education Department General Administrative Regulations (EDGAR) parts [606](#), [607](#), [608](#), [609](#), and [637](#).

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.

The information gathered by the APR will be used to (1) monitor the annual progress of Titles III, V, and VII grantees; (2) determine future funding of awards to grantees; (3) collect GPRA data to report to policymakers; (4) follow through on corrective action plans resulting from IG audits; (5) analyze and report program profiles, trends and practices; and (6) evaluate program and grants management success. The project directors compile the information for the report and submit it to the Department of Education via a secure web-based report at <https://HEPIS.ed.gov/>. Since inception, we have captured more than 10,000 annual reports from Titles III, V, and VII grantees. Once received, the Institutional Service (Titles III, V, and VII) program offices and other applicable internal and external entities may analyze the APR information. The results of the report have played, and will continue to play, a central role in analyzing project and program results, forecasting, creating a transparent view of Titles III, V, and VII programs and demonstrating the U.S. Department of Education's success in improving access to our nation's higher education system. Trend and profile reports are being developed for all programs using the new Higher Education Programs (HEP) IS data system.

The program office makes grant awards for the following year in the G5 grants management system, which provides at least 90 days to inform grantees of their funding status. Grantees must demonstrate that they have made significant progress towards meeting the goals of their project objectives to receive funding for the next cycle of an award. The APR records the accomplishments or progress of a project, provides grantees with an opportunity to articulate why grant objectives were or were not met, and documents their planned and actual federal expenditures. In addition, the APR has narrative sections that allow grantees to communicate important information that is harder to capture in the quantitative sections of the report, such as unexpected results from their Titles III, V, or VII projects, the implementation of evidence-based interventions, and institutionalization.

The APR is structured to provide varying levels of analysis, the most expansive of which is the collection of GPRA data and independent evaluation information. The most detailed and individualistic level of analysis is focused on the specific grant activities identified in the grantee's original application or comprehensive development plan. As the grantees provide responses to the status of their activities, the configuration of the APR allows for broader inquiry by grouping activities into categories that are identified in the legislation governing Titles III, V, and VII. The flexible structure of the APR is further conducive to a program-wide analysis and allows us to measure the targeting of federal resources, the program outputs, and subsequently, the success of meeting the programs' legislative intent. These analyses are central to our compliance with GPRA

requirements, the President's transparency initiative, the Foundations for Evidence-Based Policymaking Act of 2018, and the need to evaluate national programs and individual projects from independent sources.

- 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. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system, or website from paper), please explain in number 12.**

The APRs are housed and maintained under contract with The Tactile Group in the HEP IS data system located at <HTTPS://HEPIS.ed.gov/>. This custom data system was built in 2019 to replace a former Cold Fusion system and to improve data quality and integration between 5 prior systems with interconnected data elements. The data system utilizes the institution's OPEID as the data universe and assigns rights to individual users based on their email address. Users have a single login that is maintained behind federal security requirements that include two-factor authentication. The users' rights may include access to the grant eligibility application, the HBCU/TCCU formulas, FIPSE grants, endowment reports, and the IS APR for multiple grants. The IS APR is assigned to a user according to the PR Award Number.

Data from G5 is uploaded into the HEP IS data system annually to create a grantee file that is then associated with the OPEID and assigned to a user. These files are updated annually. The data from G5 include institutional and grant factors. Additionally, after the first year, some data are incorporated into the following years' APRs. For example, reported graduation and retention rates carry over from prior years. These data may be updated or maintained. System users enter data, save, and return to the report before submitting it. They may print out the report at any time. Additional users may be added to the APR for review.

The advantages of a web-based APR system for IS are significant. This system allows for mandatory web-security, data integration, and analytical reporting. For clarity in completing the report, the web-based version displays only the relevant portions of the APR to the grantee, based on the program that the grantee is participating in and the type of institution the grantee represents. Given that the APR is intended to serve multiple programs and diverse institutions, if the report is viewed in its entirety, there are an overwhelming number of options. The primary section that this affects is the legislatively allowed activities that are defined in federal legislation for each program. All these data are maintained in a singular data system that integrates data across OPEIDs. This allows for data integration and analyses as requested by Congress and through the Freedom of Information Act (FOIA) requests.

Since the use of an electronic data system, we have collected 99% of approximately 10,000 individual performance reports through an electronic APR. The APR is accessible by all personal computers, tablets, and mobile phones with web browsers in a Linux, Apple, or Microsoft environment. The most recent completion rate across all programs for the online APR (for the FY 2019 data collection) was 99.3%.

Considerable effort has been devoted to providing training to program staff and technical assistance to grantees. A user manual is available for all grantees and staff 24 hours a day under the “Help” tab at [HTTPS://HEPIS.ed.gov/](https://HEPIS.ed.gov/). Beginning in 2020, program staff can login and view grantee screens to better support grantees as they complete their APRs. Grantees and program staff can contact the Help Desk for any of the database’s subsystems at HEPIS.HelpDesk@thetactilegroup.com.

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.

Duplications found in the report deal solely with the Institutional Profile (Section Two) data collection in the APR. As noted in the instructions, the tables correspond to surveys from the Integrated Postsecondary Education Data System (IPEDS), which is administered by the National Center for Education Statistics (NCES), located within the U.S. Department of Education. IPEDS is a comprehensive system of surveys designed to collect institution-level data in such areas as enrollment, program completion, faculty, staff, and finances. Approximately 9,900 postsecondary institutions complete the IPEDS surveys every year.

The Institutional Profile data that the APR is collecting is essential because it lends relevant context to the report. It is important to make clear the operating conditions of the institutions we serve, especially since so many of them focus on disadvantaged students and underrepresented groups or “at risk” students. Also, this institutional context helps gauge how our programs have institution-wide effects. IPEDS offers a meaningful institutional context by providing data regarding student body characteristics, enrollment, and graduation / completion rates. Rather than create our own method for collecting these data, we felt that it would be less burdensome for the grantee to align our report with the IPEDS survey.

The data in the Institutional Profile section provides a snapshot of the grant programs’ GPRA indicators, whereas the data from IPEDS will not be available for at least 2 years. As such, asking for a snapshot will allow us to aggregate reported longitudinal data for our grant programs. Additionally, when most grantees log into the APR, the Institutional Profile section is already populated with data from prior years. IS has been working closely with NCES to ensure that this duplication of data will have a minimal burden on institutions.

Based on the scope of institutions participating in the IPEDS survey and our consultation with the grantee community, we believe that providing the data for this section will be of little burden to most institutions.

- 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 will not have a significant impact on small businesses or 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.**

Without the use of an APR, we can expect three major consequences. First, our efforts to monitor programs will be greatly hindered. As the IG audit reports have made clear, we need to improve our program monitoring, and the APR is central to this challenge. By revitalizing and improving our performance reports and data collection, we can gain a deeper understanding of our programs without substantially increasing our grantees' existing burden expectations. While the recommendations made by the IG are certainly a motivating force, even more so is the expectation that with more adequate tools, we can serve our grantees better and more successfully demonstrate the effectiveness of our programs to policymakers and the general public.

Secondly, without a standardized APR it is very difficult to aggregate data in a way that satisfies GPRA requirements and IG concerns. The immense diversity of Titles III, V, and VII grant activities, as well as the variety of goals expressed in the authorizing legislation, has made it challenging to measure program outcomes in a reliable manner. With the APR, we are collecting information that is more reliable, reasonable, and informative.

Third, we cannot present to the American citizens and the higher education community a comprehensive transparent view of Titles III, V, and VII programs without this data collection.

- 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 Supporting Statement 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.

Include a citation for the 60-day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60-day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30-day notice, indicate that a notice will be published. 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.

During the period of the prior cleared APR (2017-2020), IS has actively consulted with our Titles III, V, and VII grantee communities. Our goal has been to solicit our grantees' input, guidance, and support in developing a new data system and APR that will more fairly and accurately measure institutional and program performance. OPE's Institutional Service has begun a long-term effort to reconsider and revise the entire proposal and performance-report process, including consultation with the grantees and other stakeholder communities. This has been enhanced with the 2018 passage of the Foundations for Evidence-Based Policymaking Act.

Future revision will continue to move the IS APRs from compliance-based to outcomes-based reporting. In particular, discussions on potential revisions to the proposal and reporting processes, the feedback we have already received, efforts to develop outcome measures, integration of formula grant data collections into the HEP IS data system, and possible improvements with the legislatively-allowed activities are currently being reviewed in consultation with the Titles III, V, and VII grantee communities.

A 60-day *Federal Register* notice was published to solicit public comments. One comment was received, which staff reviewed and responded to upon the closing of the comment period. A 30-day *Federal Register* notice will be published to solicit public comments.

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

No payment or gifts are provided 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.¹ If the collection is subject to the Privacy Act,

¹ 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 –

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. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.

The Department makes no pledge about the confidentiality of the data. No personally identifiable information, other than contact information for the grantee project director, is provided.

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.**

There are no questions of a sensitive nature within the APR.

12. **Provide estimates of the hour burden for this current information collection request. The statement should:**
 - **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third-party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
 - **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
 - **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. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form, and aggregate the hour burden in the table below.**
 - **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. 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. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.

Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC										
Program Title	CFDA Number	Program Name	Sample Size	Response Rate	No. of Respondents	No. of Responses	Annual Hour Burden Per Response	Total Burden Hours	Estimated Respondent Hourly Wage	Total Annual Costs
Title III-A	84.031A	SIP	N/A	N/A	245	245	18	4,410	30	\$132,300
Title III-B	84.031B	HBCU	N/A	N/A	98	98	18	1,764	30	\$52,920
Title III-F	84.031E	HBCU-F	N/A	N/A	98	98	18	1,764	30	\$52,920
Title III-F	84.031C	HSI-STEM	N/A	N/A	92	92	18	1,656	30	\$49,680
Title III-F	84.031D	TCCU-F	N/A	N/A	31	31	18	558	30	\$16,740
Title III-F	84.031F	SIP-F	N/A	N/A	31	31	18	558	30	\$16,740
Title III-B	84.031K	HBGI	N/A	N/A	24	24	18	432	30	\$12,960
Title III-A	84.031L	AANAPISI	N/A	N/A	11	11	18	198	30	\$5,940
Title V-B	84.031M	PPOHA	N/A	N/A	39	39	18	702	30	\$21,060
Title III-A	84.031N	ANSI	N/A	N/A	5	5	18	90	30	\$2,700
Title III-A	84.031P	PBI	N/A	N/A	10	10	18	180	30	\$5,400
Title III-F	84.031R	ANSI-F	N/A	N/A	5	5	18	90	30	\$2,700
Title V-A	84.031S	HSI	N/A	N/A	267	267	18	4,806	30	\$144,180
Title III-A	84.031T	TCCU	N/A	N/A	35	35	18	630	30	\$18,900
Title III-F	84.031V	NHSI-F	N/A	N/A	16	16	18	288	30	\$8,640
Title III-A	84.031W	NHSI	N/A	N/A	23	23	18	414	30	\$12,420
Title III-A	84.031X	NASNTI	N/A	N/A	7	7	18	126	30	\$3,780
Title III-E	84.120A	MSEIP	N/A	N/A	75	75	18	1,350	30	\$40,500
Title III-F	84.382A	PBI-U	N/A	N/A	24	24	18	432	30	\$12,960
Title III-F	84.382B	AANAPISI-F	N/A	N/A	14	14	18	252	30	\$7,560
Title III-F	84.382C	NASNTI-F	N/A	N/A	12	12	18	216	30	\$6,480
Title VII-A	84.382D	PBI-MA	N/A	N/A	0	0	18	0	30	\$0
Title VII-A	84.382G	MDHBCU	N/A	N/A	18	18	18	324	30	\$9,720
Total					1,180		Average 18	21,240	*Average \$30	\$637,200

Please ensure the annual total burden, respondents, and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

**Estimate based on total burden hours x \$30.00 estimated hourly wage table:*

The number of respondents and responses are based on the actual completed APRs for FY 2019.

The hour burden for completing the APR was reduced from 20 to 18 hours due to the simplification of the 2020 APR as compared to the 2017 version. Further, the reduction takes into account the improvement of the data system (<HTTPS://HEPIS.ed.gov/>) from streamlining the electronic format based on an improved UI/UX design. This has also resulted in improved customer satisfaction scores on the grantee satisfaction survey. The estimated respondent hourly wage was also increased based on the Bureau of Labor Statistics website.

Below is a breakdown in the estimated Public/Private grantee burden. The estimate is 70% public and 30% private.

- Number of respondents: 1,180
 - Public: 826
 - Private: 354
- Frequency of response: Once per year for 1,180 grants
 - Public: 826
 - Private: 354
- Annual hour burden: 18 hours
 - Public: 826 *18 = 14,868
 - Private: 354 *18 = 6,372
- Estimated annualized cost to respondents: \$637,200
(Estimate was based on total burden hours X \$30.00 estimated hourly wage)
 - Public: 826 *18 = 14,868 *\$30 = \$446,040
 - Private: 354 *18 = 6,372 *\$30 = \$191,160

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 costs to respondents other than those listed in question 12.

- 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.**

Contract for data collection, site maintenance, data checking, and updates is approximately \$125,000 per option year. Staff support, including technical and substantive contract monitoring, is approximately 200 hours per year and \$75 per hour, totaling \$15,000. The estimated overhead cost is \$1,000. Total cost estimate: \$141,000.

- 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).

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden		21,240	
Total Responses		1,180	
Total Costs (if applicable)			

This collection is a reinstatement. Therefore, all burden is new.

- 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.**

Institutional Service will not be publishing the results of the information collection.

- 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.**

Institutional Service is not seeking approval to not display the expiration date for OMB approval of the information collection.

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

There are no exceptions to the certification statement in the Certification of Paperwork Reduction Act.