Annual Performance Report for Titles III, V, and VII Grants

Summary of Public Comment

Introduction

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 revision of currently approved information collection 1840-0766, which is scheduled to expire 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, 20 U.S.C. 1067q

- 84.031C, 20 U.S.C. 1067q (b) (2) (B)
- 84.031D, 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.

Data Systems

Comment: My comment is regarding points (4) and (5): (4) how might the Department enhance the quality, utility, and clarity of the information to be collected; and (5) how might the Department minimize the burden of this collection on the respondents, including through the use of information technology.

The APR system used for FY 18-19 reporting was cumbersome and unclear. There were many categories of questions and answers that did not seem to apply to the grant type we were reporting for. This was not specifically addressed in the instructions, so it was difficult to know how to answer those items. Specific reporting mechanisms for each grant type would greatly reduce the burden of collection and improve the quality and clarity of the information being collected.

This utility of this system was also difficult, increasing the burden on respondents. There was no way to fully preview each question that would need to be answered. The sample/guide documents did not include many of the additional questions that opened up throughout the system as we entered data. That meant the additional data and necessary information could not be gathered ahead of time before entering in the system. Then, as new and unforeseen questions popped up, respondents then had to exit the system, go back to data collection and analysis to then be able to move forward in the report. Sometimes this meant a delay of multiple days if supporting personnel were needed for assistance. This made the process very frustrating and did not allow respondents to efficiently and effectually report on grant activities.

The questions in the Section 1a and 1b of the report need much more explanation. What is the point of those - they seem repetitive from grant activity specific reporting in sections 3c and 3d. Should the information in 1a/1b be repeated in sections 3c/3d? The priorities of the report seem too diffuse - with so many questions asked that are not directly about the grant-specific activities and expenditures, it was difficult to address so many topics and seemingly so many different purposes. To enhance the quality, utility, and clarity of the information being collected the focus should be clear so respondents can address those purposes. This will lessen the burden on respondents and improve information collected.

Response: The Department upgraded the IS APR system in Fall 2019. The new data system (HEP IS) improved the reliability and usability for data collections.

The second point appears to refer to the previous APR. The current document improves the clarity and removes a previous section that is being referenced here.

Change: none