

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.**

The Department of Education (Department) is requesting approval of a **reinstatement with change**. The Veterans Upward Bound (VUB) Program's Annual Performance Report (APR), which is used to collect data from projects funded by VUB program grants, expired August 31, 2020 (OMB No.: 1840-0832).

Veterans Upward Bound (VUB), one of the U.S. Department of Education's Upward Bound Programs, and a component of the Office of Postsecondary Education's TRIO Programs, is designed to motivate and assist veterans in developing academic and other requisite skills necessary for acceptance and success in a program of postsecondary education. The program provides assessment and enhancement of basic skills through counseling, mentoring, tutoring and academic instruction in the core subject areas. The primary goal of the program is to increase the rate at which participants enroll in and complete postsecondary education programs.

All VUB projects must provide instruction in mathematics through pre-calculus, laboratory science, foreign language, composition, and literature. Projects may also provide short-term remedial or refresher courses for veterans who are high school graduates but have delayed pursuing postsecondary education. Projects are also expected to assist veterans in securing support services from other locally available resources such as the U.S. Department of Veterans Affairs, veterans' associations, and other state and local agencies that serve veterans.

The Department's APR for VUB collects each current grantee's data at the participant level on services and performance over the course of a year. The Department uses the information conveyed in the performance report to assess a grantee's progress in meeting its approved goals and objectives and to evaluate a grantee's prior experience in accordance with the program regulations in 34 CFR 645.32. Grantees' annual performance reports also provide information on the outcomes of projects' work and of the VUB program as a whole. In addition, APR data allows the Department to respond to the reporting requirements of the *Government Performance and Results Act*.

The change made in the VUB annual performance report involves a change in the identifying number for each individual participant. The VUB program, like other TRIO

programs that gather participant-level data, now requires use of Department-assigned case numbers for participants, in lieu of the Social Security numbers (SSNs) that TRIO has used in the past. Both case numbers and SSNs allow the Department to link records for individual participants over multiple reporting years, so that the Department can track academic outcomes for the participants the grantees have served. The advantage of case numbers is to provide greater protection for participants' security and privacy.

The Department collects information from VUB grantees under the authority of Title IV, Part A, Subpart 2, Chapter 1, Sections 402A and 402C of the *Higher Education Act of 1965*, as amended; the program regulations in 34 CFR 645; and the Education Department General Administrative Regulations (EDGAR) in 34 CFR 75.590, 75.720, and 75.732. The authorizing statute, as amended in 2008 by the *Higher Education Opportunity Act*, which is the basis for the current program regulations, can be found at the following URL:

<https://www2.ed.gov/programs/triovub/legislation.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.

The Department uses the data collected to (a) evaluate projects' accomplishments; (b) determine the number of prior experience points to be awarded to current grantees; and (c) aid in compliance monitoring (e.g., to determine whether grantees are in compliance with the selection requirements for project participants [34 CFR 645.3]).

In addition, the Department uses the APRs to produce program-level data for annual reporting, prepare budget submissions to OMB and Congress, and respond 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. 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 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 VUB projects have been submitting the annual performance report via the Internet since 2001.

- 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 grantees submit in their performance reports is unique to each project and is not collected elsewhere, no duplication exists. No other instrument is available to collect the information that the program needs to assess prior experience or program outcomes. The data collected in the APR are fundamental to this 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 affect 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 grant application. In addition, the information is needed to award prior experience points to grantees. Without this data collection, the Department would not have the data to assess the prior experience provision of the authorizing statute, respond to the GPRA, and other program performance and efficiency measures, or 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 more than three years as required under 34 CFR 74.53(b). In order to assess the impact of the program services on participants' academic progress, and in light of the postsecondary completion measure for VUB established as a result of the HEOA, grantees should track the academic progress of all prior-year participants until postsecondary completion.

- 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.

Department staff members have attended a number of state, regional, and national meetings at which the Department solicited informal views and comments on reporting requirements from grantees and other interested persons. The Department published a 60-day Federal Register notice to solicit public comment on the APR form and received no comments. A 30-day Federal Register notice will now be published.

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 payment 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 System of Records 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, 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.

No assurances of confidentiality are provided to the respondents. The VUB APR does collect personally identifiable information and thus a Privacy Act Statement appears both

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 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

in the data collection instrument and in the accompanying General Instructions for completing the APR. Regarding the relevant System of Records Notice, the citation for the TRIO programs (one of which is VUB) is this: “TRIO Programs Annual Performance Report System—74 FR 4165, citation dated 1/23/2009.”

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

- 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 burden hours for this collection of information are 1,054 hours. We estimate approximately 62 respondents x 1 (one) APR each at 17 hours per respondent. The APR will be submitted once a year (annually).

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
<u>VUB APR</u> Public Estimate	N/A	N/A	54	54	17	918	<u>Professional:</u> 54 x 15 hrs=810 hrs 810 hrs x \$42/hr= \$34,020 <u>Clerical:</u> 54 x 2 hrs=108 hrs 108 hrs x \$23/hr= \$2,484	<u>Professional:</u> \$34,020 <u>Clerical:</u> \$2,484 <u>Total:</u> \$36,504
<u>VUB APR</u> Private Estimate	N/A	N/A	8	8	17	136	<u>Professional:</u> 8 x 15 hrs=120 hrs 120 hrs x \$42/hr= \$5,040 <u>Clerical:</u> 8 x 2 hrs=16hrs 16 hrs x \$23/hr= \$368	<u>Professional:</u> \$5,040 <u>Clerical:</u> \$368 <u>Total:</u> \$5,408
Annualized Totals	*	*	62	62	*	1,054	*	\$41,912

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.

Estimated number of respondents	62
Estimated preparation time	17 hours
Total estimated burden hours	1,054

(Estimated Burden: 1,054 hours. Total number of hours [preparation time] multiplied by the total number of respondents equals estimated burden hours.)

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 grantees to respond to this data collection is estimated as follows:

Estimated annual costs to respondents:

Professionals (62 personnel X 15 hours @ \$42 per hour)	\$39,060
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Clerical (62 clerical X 2 hours @ \$23 per hour)	\$ 2,852
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Total estimated cost to respondents	\$41,912
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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 associated with this information collection. Grantees are required by program regulations to collect and maintain this information. The costs to transmit the data electronically via the Web reflect 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 collecting, aggregating, and disseminating the information.

Annual contract cost for development of APR Web application, Web-based data collection, Help Desk support, data processing, and grantee PE reports.	\$52,972
Analyses of data and preparation of national statistical reports.	\$55,585
Professional staff to update report form and prepare clearance package clearing performance report form: \$62.40 per hour X 120 hours = \$7,488 Overhead (est. at 50%): 120 x \$31.20 = \$3,744	\$11,232
Professional staff to review and edit reports for dissemination: \$62.40 per hour X 160 hours = \$9,984 Overhead (est. at 50%): 160 x \$31.20 = \$4,992	\$14,976
Clerical staff to type, route, and copy report form: \$23 per hour X 15 hours = \$345 Overhead costs (est. at 50%) 15 x \$11.50 = \$172.50	\$517.50

Other Department staff to review and approve the request: \$57 per hour X 10 hours = \$570 Overhead costs (est. at 50%) 10 x \$28.50 = \$285	\$855
OMB review (estimated): \$57 per hour X 8 hours = \$456 Overhead costs (est. at 50%) 8 x \$28.50 = \$228	\$684
TOTAL FEDERAL COST	\$136,821.50

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		1054	
Total Responses		62	
Total Costs (if applicable)			

This is a reinstatement of a discontinued collection. 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.**

Collected information will be analyzed annually to determine if each grantee is meeting its approved goals and objectives and to award PE points. Performance measures and

efficiency measures for VUB, based on data conveyed in grantees' APRs, are disseminated in the Department's Annual Program Performance Plan. In addition, the Department's Web site provides data on performance and efficiency measures, beginning with the 2007–08 performance period, at the grantee level; this more detailed reporting has been made possible due to improvements in accuracy resulting from incorporating the standard objectives into the report form.

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.

This report form and the Web site will display the expiration date for OMB's 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.