



**Part A: Supporting
Statement for
Paperwork
Reduction Act
Submission**

**Study of Financial Aid
Supports for GEAR UP
Students**

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Part A: Supporting Statement for Paperwork Reduction Act Submission

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A. Justification

Introduction

The U.S. Department of Education’s Institute of Education Sciences (IES) requests Office of Management and Budget (OMB) clearance for data collection activities for the *Study of Financial Aid Supports for GEAR UP Students*. This is a congressionally-mandated evaluation of the scholarship component of the Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) program. Specifically, the request covers two data collection activities: (a) telephone interviews with State Project Directors and (b) collection of numeric data on grant expenditures and student scholarships through a Supplemental Data Form. This is the first and only request for collection of data for this study.

Established in the 1998 Higher Education Act (HEA), GEAR UP provides competitive, multi-year grants to states and local partnerships to prepare students attending high-poverty middle and high schools for college enrollment and success.¹ State grantees must use at least half of their funds to provide college scholarships to GEAR UP students, unless they receive a waiver from the U.S. Department of Education (ED).

A.1 Circumstances Making the Collection of Information Necessary

This study fulfills a congressional mandate to collect information on states’ provision of scholarships to students participating in GEAR UP. Specifically, the HEA states:

In order to evaluate and improve the impact of the activities...the Secretary shall...award one or more grants, contracts, or cooperative agreements... to evaluate the effectiveness of the program and, as appropriate, disseminate the results of the evaluation. Such an evaluation shall include a separate analysis of—

- (1) the implementation of the scholarship component...; and*
- (2) the use of methods for complying with matching requirements...²*

How GEAR UP grantees provide scholarships to support students’ enrollment and persistence in college is of interest for several reasons. First, this component distinguishes GEAR UP from other federal college access programs that serve primarily low-income students or those from high-poverty schools. Second, the 2008 HEA reauthorization gave state grantees flexibility in how they implement and fund the scholarships. While program statute requires states to set aside at least half of their GEAR UP funds to provide scholarships (states that do are referred to as “set-aside states”), states may be granted a waiver to devote all of their GEAR UP funds to other activities (referred to as “waiver states”) if they can ensure that GEAR UP students have access to alternative scholarship funds—such as those that are state-funded. The reauthorization also changed other aspects of the scholarship component, such as the minimum amount and which students must be eligible to receive this financial aid.

¹ <https://www2.ed.gov/programs/gearup/index.html>

² Higher Education Act of 1965, as amended, Title IV, Part A, Subpart 2, Chapter 2, [20 U.S.C 1070a-21 1070a 28](https://www.govinfo.gov/content/pkg/USCODE-2016-title20/html/USCODE-2016-title20-chap28-subchapIV-partA-subpart2-divsn2.htm). Sub-Section: §1070a-27. Evaluation and report. Retrieved from: <https://www.govinfo.gov/content/pkg/USCODE-2016-title20/html/USCODE-2016-title20-chap28-subchapIV-partA-subpart2-divsn2.htm>

Little information is available about how states are carrying out these requirements or the challenges they face in administering this part of the GEAR UP program. The data collection for this study will examine the scholarship practices of all states that received a GEAR UP grant since fiscal year 2011, the first year the scholarship changes went into effect. ED plans to use the study results to inform program improvement, both current efforts and through the upcoming reauthorization of the HEA.

A.2 Purposes and Use of the Information Collection

This study will collect data to understand the factors contributing to states' decisions to set aside funds for GEAR UP-funded scholarships or seek a scholarship waiver, as well as states' policies and actions related to scholarship disbursement. Data collected for the study will be used to produce one report and a shorter brief. The report will describe states' GEAR UP scholarship policies and practices, including why states decide to use GEAR UP funds to provide scholarships or request a waiver from the scholarship requirement. The shorter brief will focus on how states allocate grant funds to scholarships versus other activities, including any differences in how set-aside and waiver states expend funds.

Exhibit A-1 presents the study's research questions and sub-questions.

Exhibit A-1. Research Questions

Research Question 1: To what extent do state grantees emphasize access to scholarships for GEAR UP students?
<ul style="list-style-type: none"> • How are federal or other funds used to provide scholarships to GEAR UP students? • What processes do states use to inform GEAR UP students about scholarships, determine students' scholarship eligibility, and disburse funds?
Research Question 2: How do state grantees allocate their resources between scholarships and other state and local GEAR UP efforts?
<ul style="list-style-type: none"> • How does resource allocation differ across states? • What types of matching contributions support state grantees' GEAR UP activities, particularly scholarships?
Research Question 3: What challenges do GEAR UP grantees face in administering GEAR UP scholarships and other aspects of the program?

To address these research questions and respond to the congressional mandate, the study will rely on four data sources: reviews of GEAR UP grantees' Annual Performance Reports and grant applications, interviews, and a Supplemental Data Form (Exhibit A-2). To minimize burden on states and ensure that the study takes advantage of any information that states have already provided, the study team first will review existing GEAR UP documents, including state applications and performance reports. Then the study team will conduct one-time 90-minute telephone interviews with GEAR UP State Project Directors in fall 2020 (a draft interview protocol is included as Appendix A). Immediately following the interviews, the study team will use a standardized Excel template, the Supplemental Data Form, to collect numeric information that would be burdensome to collect as part of the telephone interview (a draft of the form is included as Appendix B). IES has contracted with Abt Associates Inc. to conduct the study, including all data collection.

Exhibit A-2. Data Sources for the Study

Data Source	Respondent	Use(s) in Study
Review of Annual Performance Reports ^a	GEAR UP Program Office	<ul style="list-style-type: none"> Ascertain overall grant expenditures to understand share of expenditures spent on scholarships
Review of Grant Applications ^a	GEAR UP Program Office	<ul style="list-style-type: none"> Form subgroups of set-aside vs. waiver states
Phone Interviews	State Project Directors	<ul style="list-style-type: none"> Describe implementation of scholarship component, including: <ul style="list-style-type: none"> Rationale for key decisions regarding scholarship provision and waivers Details of state scholarship policies Role of subcontractors Challenges related to administering GEAR UP-funded scholarships or applying for a waiver
Supplemental Data Form (Excel worksheet)	State Project Directors	<ul style="list-style-type: none"> Describe implementation of scholarship component, including: <ul style="list-style-type: none"> Number of students receiving scholarships GEAR UP grant expenditures by activity, including scholarships Types of matching contributions

^aThese data are not covered in this clearance package. The ED program office will provide these items to the study team so there is no associated burden on outside respondents.

A.3 Use of Information Technology and Burden Reduction

To minimize burden on respondents, the study team will use strategies that have proven successful in past studies that the team has conducted with similar populations of respondents (for example, the Study of Enhanced College Advising in Upward Bound, the Study of Student Messaging in GEAR UP, and the Comprehensive Literacy Program Evaluation). General strategies to minimize burden using technology are described below.

A.3.1 Phone Interviews

Experienced interviewers will conduct the interviews by video conference or telephone using a standardized interview protocol. The use of technology will not reduce burden on the respondent but, prior to each interview, the interviewer will review the information collected from the Annual Performance Reports and grant applications to ensure that the interview does not ask questions for which there is existing information. Interviewers will ask the questions in an open-ended manner, but will code responses into pre-specified categories to the extent possible, using an Access database. This approach provides for both standardization across states and adequate opportunity for respondents to provide additional details. In addition, to ensure that interviewers capture responses accurately and can conduct further coding efficiently, the study team may digitally record the interview with respondent permission.

A.3.2 Supplemental Data Form

To minimize burden on State Project Directors, the study will send the Supplemental Data Form as an editable Excel workbook to collect numeric data. This form will eliminate numeric questions during the interview and enable State Project Directors to consult project records or other state staff to provide this information. To reduce burden, the form will use:

- **Accessible software.** The form will be an Excel workbook, requiring no additional software to complete and allowing the Project Director to share with other staff as needed.

- **Pre-populated data.** The study team will pre-populate the form with background information from the states' Annual Performance Report data, focusing the data collection on the relevant grant years and expenditure types for each state. Furthermore, the form questions will be customized based on the information acquired during the interview.
- **Automated validation checks.** The form will be programmed to check for allowable ranges for numeric questions, minimizing out-of-range or unallowable values. This type of programming also reduces respondent entry errors that could require follow-up to gather correct information.

Before concluding the interview, the interviewer will review the contents and structure of the Supplemental Data Form with State Project Directors, and encourage Project Directors to contact him or her with any questions that may arise as they are completing the form. State Project Directors will have two weeks to complete the form. The study team will schedule a brief (15 minute) check-in call with each State Project Director after sending the form to answer any additional questions or troubleshoot any challenges.

A.4 Efforts to Identify Duplication

The study team will review states' Annual Performance Reports and grant applications prior to the interviews, extracting any data related to states' approach to the GEAR UP scholarship component. This will ensure that respondents are only asked to provide information in the interviews and on the Supplemental Data Form that is not available from other sources. All information collected for this study aligns directly with the study questions.

A.5 Efforts to Minimize Burden in Small Businesses

There is no anticipated impact on small businesses or other small entities.

A.6 Consequences of Not Collecting the Information

The proposed study is congressionally mandated by the 2008 HEA reauthorization (HEA § 20-1070a-27). The evaluation is intended to inform Congress about how GEAR UP state grantees implement a particular provision in the law that promotes GEAR UP students' access to financial aid. Without collecting the proposed data, ED could not meet its obligations to Congress.

A.7 Special Circumstances Justifying Inconsistencies with Guidelines in 5 CFR 1320.6

There are no special circumstances concerning the collection of information in this study.

A.8 Consultation Outside the Agency

A.8.1

Federal Registrar Announcement

On November 2, 2020, a 60-day Federal Register Notice was published at 85 FR 54543. One public comment was received that was nonsubstantive. Updates to documents were made based on stakeholder feedback. A 30 day public comment notice will be published.

A.8.2**Consultations Outside the Agency**

A Technical Working Group (TWG) will provide input at key points during the study. TWG members have expertise in areas relevant to this study including:

- College access for low-income students
- Financial aid awareness and knowledge
- State financial aid provision
- Data collection through interview methods

Members of the TWG will meet in 2020 to discuss the study design, instrumentation, and data collection plans. The TWG will convene again in 2021 to review preliminary findings and consider how study findings will be discussed in the study reports to be most accessible and useful to GEAR UP program stakeholders. TWG members, listed alphabetically below, include:

- Melissa Caperton, American College Application Campaign
- Joni Finney, University of Pennsylvania
- Stella Flores, New York University
- Adam Green, East Tennessee State University
- Laura Hamilton, University of California, Merced
- Michal Kurlaender, University of California, Davis
- Brian McCall, University of Michigan

A.8.3**Unresolved Issues**

There are no unresolved issues.

A.9 Payments or Gifts to Respondents

There will be no payments or gifts to respondents.

A.10 Assurance of Confidentiality

Abt Associates will conduct all data collection activities for this study in accordance with relevant regulations and requirements, which are:

- The Privacy Act of 1974, P.L. 93-579 (5 U.S.C. 552a)
- The Education Sciences Institute Reform Act of 2002, Title I, Part E, Section 183

The research team will protect the confidentiality of all data collected for the study and will use it for research purposes only. Other than the names, titles, and contact information for GEAR UP State Project Directors—information typically already available in the public domain on state websites—no data collected for the purposes of this study will contain personally-identifiable information. All data will be kept in secured locations and identifiers will be destroyed as soon as they are no longer required. All members of the study team having access to the data will be trained and certified on the importance of confidentiality and data security.

Grant recipients have an obligation to participate in Department evaluations (Education Department General Administrative Regulations (EDGAR) (34 C.F.R. § 76.591)). When reporting the results, data may be reported by state. Thus, while personally identifiable information (PII) about individual respondents will not be released, data displayed by state could be attributed to the state agency or possibly an individual respondent. Included in all requests for data will be the following statement:

“Responses to this data collection will be used only for descriptive research purposes. None of our reports will name you as an individual. Information collected for this study comes under the confidentiality and data protection requirements of the Institute of Education Sciences (The Education Sciences Reform Act of 2002, Title I, Part E, Section 183). As part of the study, data on state policies and supports may be reported by state. Thus, while personally identifiable information (PII) about individual respondents will not be released, data displayed by state could be attributed to the state agency or possibly an individual respondent.”

The following safeguards are routinely employed by Abt Associates to carry out confidentiality assurances, and they will be consistently applied to this study:

- All study team members involved in collecting data will be carefully trained in data security procedures.
- Personally identifiable information is maintained on separate forms and files, which are linked only by sample identification numbers.
- Access to hard copy documents is strictly limited. Documents are stored in locked files and cabinets. Discarded materials are shredded.
- All internal networks are protected from unauthorized access by using firewalls and intrusion detection and prevention systems. The networks are configured so that each user has a tailored set of rights, granted by the network administrator, to files approved for access and stored on the network.
- Computer data files are protected with passwords, and access is limited to specific users, who must change their passwords on a regular basis and conform to strong password policies.

A.11 Questions of a Sensitive Nature

This study does not include questions of a sensitive nature.

A.12 Estimate of Response Burden

The total respondent burden for this data collection is 94.5 hours. The total cost burden for this data collection is estimated at \$4,286.52. Estimates are based on the following assumptions for each of the 42 states that received a GEAR UP grant between FY 2011 and FY 2018.

- The study team will conduct a one-time 90-minute telephone interview with each State Project Director.
- Each State Project Director will complete the Supplemental Data Form, which may take up to 45 minutes (30 minutes to complete the form and 15 minutes to participate in a follow-up call answering any questions about the form or data provided).
- An hourly wage of \$45.36 for Postsecondary Administrators was used to estimate the total cost of the hours required of State Project Directors.

Exhibit A-3 presents the estimated respondent burden for each data collection activity.

Exhibit A-3. Estimate of Respondent Burden

Data Collection Activity	Number of Respondents	Hours per Response	Total Burden Hours per Respondent	Estimated Hourly Rate	Total Burden Hours	Total Cost of Respondent Burden
Telephone Interview	42	1.5	2.25	\$45.36 ^a	94.5	\$4,286.52
Supplemental Data Form	42	0.75				

^aThe hourly wage estimate for GEAR UP State Project Directors is based on the U.S. Department of Labor, Bureau of Labor Statistics Occupational Outlook Handbook 2018 hourly wage data for Postsecondary Administrators. This data was retrieved from: <https://www.bls.gov/ooh/management/postsecondary-education-administrators.htm>

A.13 Estimate of Total Capital and Startup Costs/Operation and Maintenance Costs to Respondents or Record-Keepers

There are no annualized capital/startup or ongoing operation and maintenance costs involved in the collection of the proposed data.

A.14 Estimates of Costs to the Federal Government

The estimated cost to the federal government of this study, including its data collection activities and reporting as described above, is \$699,847. Study activities will be carried out from May 2020 to September 2022, over 28 months. Thus, the average annual cost to the federal government for this study is approximately \$233,282.

A.15 Changes in Burden

This is a request for a new collection of information, so there are no program changes or adjustments.

A.16 Plans for Analysis, Publication and Schedule

A.16.1 Analysis Plans

To address the research questions, the study team will conduct descriptive analyses. Specifically, the study will produce summary statistics such as means and standard deviations (for continuous variables), and tabulations such as counts and percentages (for categorical variables). Because the study will collect data from the census of GEAR UP grantees from FY 2011 to the present, common statistical tests to determine whether differences are real, such as F-tests, are not necessary.

The study team expects the analysis and reporting to focus on the following topics of interest:

- Trends in the share of states seeking a waiver over time, and states' reasons for seeking waivers
- How waiver states ensure that GEAR UP students have access to other scholarships based on participation in GEAR UP
- How GEAR UP students learn about available scholarships, including the role of the GEAR UP grantee and subcontractors in communicating information

- The number of GEAR UP students receiving GEAR UP-funded scholarships and other scholarships based on their GEAR UP status, and the average amount for each scholarship
- Challenges that states face in administering and tracking scholarships for GEAR UP students.

The study team will categorize respondents' answers to interview questions and the Supplemental Data Form, and then quantify and tabulate these responses. Response options shown in the data collection instruments will serve as preliminary categories for analysis. For many questions, responses from set-aside versus waiver states will be compared.

A.16.2**Publication and Schedule**

The study will produce one report and a shorter brief:

- The main report, expected in early 2022, will focus on the number of GEAR UP students receiving scholarships, through what funding sources (federal, state, or other), and in what amounts; states' scholarship policies and practices, including communication methods, eligibility criteria, and disbursement practices; and challenges state grantees face with regard to offering GEAR UP scholarships. In particular, the report will highlight differences between set-aside and waiver states on these key issues.
- The study's snapshot will describe how states allocate grant funds to scholarships versus other activities, including any differences in how set-aside states and waiver states expend funds. This snapshot is expected in early 2022.

Both the report and snapshot will be publicly available on IES's website.

A.17 Approval to Not Display Expiration Date

No exemption is requested. The data collection instruments will display the expiration date.

A.18 Exceptions to Item 19 of OMB Form 83-1

This submission describing data collection requires no exceptions to the "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-1.