

Supporting Statement for
U.S. Department of Education
Grant Performance Report Form (ED 524B)
OMB Control Number 1894-0003

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

The ED 524B form and instructions are used by many ED discretionary grant programs to enable grantees to meet ED deadline dates for submission of performance reports to the Department. This form streamlines reporting requirements and makes them uniform for grantees that receive grants in multiple programs that use the form. It eliminates the necessity of many programs' having to submit to OMB separate clearance requests for program-specific reporting forms.

Recipients of multi-year discretionary grants in these programs must submit interim performance reports, usually annually, for each year 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 "forward funded" 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 reports 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/or on project performance measures that were included in the grantee's approved grant application. The ED 524B also contains some questions related to project financial data, such as Federal and non-Federal expenditures and indirect cost information.

Performance reporting requirements are found in 34 CFR 75.118, 75.253, 75.590 of the Education Department General Administrative Regulations (EDGAR) and 2 CFR 200.328 of the Uniform Administrative Requirements.

ED is requesting a three-year renewal of the ED 524B. Before the current version of the form was approved, the Department conducted an extensive nationwide survey on the form's ease of use among grantees who had filed it with ED as both an interim and final report. In general, regarding the clarity and ease of understanding of the then-new questions and instructions on the ED 524B, the

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majority of the grantees responded with a positive response of “yes” at significantly high percentages.

ED facilitates alignment between ED performance reporting requirements in the ED 524B and the information included in the grantee’s original application by continuing to require that program offices include program performance measures in both the application package and the application notice (published in the *Federal Register*) for the program, as a way of informing potential grantees about what data they are expected to collect and report on in regard to their projects. Program offices are also required to include a link in the application package to the electronic version of the performance reporting form (e.g., ED 524B) that potential grantees will be required to use, so that applicants have a good idea of the types of data collection around which they should be designing their projects. ED continues to undertake additional outreach efforts to applicants/grantees (e.g., pre-application workshops, manuals, training sessions) to help them understand the data requirements of the ED 524B.

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 performance measures and grant requirements. This determination enables ED to assure that grants can be closed out in compliance.

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

Currently grantees may submit the ED 524B (both annual and final performance reports) electronically through the Department’s G5 grant system. There are a number of pre-populated fields and drop-down menus on the electronic ED 524B that eliminates data entry. Further, expandable fields give grantees flexibility to provide the amount and level of detail needed to describe their progress on their program and project performance measures.

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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.**

Consistent with EDGAR requirements found in 34 CFR 75.118, 75.590, 75.720, and 2 CFR 200.328 of the Uniform Administrative Requirements, the grantee is required to submit interim (usually annual) grant performance reports and a final performance report (ED 524B) that describes project performance, substantial progress, and outcomes. Information about project activities and performance is unique to each funded project and thus is not available anywhere else.

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's 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.

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 Federal Register notice was published with no public comment. A 30-day Federal Register notice will be published.

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

There are 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.

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 Grant Performance Report, ED 524B: total annual burden hours

ED estimates that over the next three years, approximately 7595 respondents each year will be required to use the ED 524B, as either an interim (usually annual) or final performance report (estimate based on actual usage in FY 2020 and planned usage in the next two years by additional ED discretionary grant programs). Approximately 5295 noncompeting continuation grantees will use this form as an interim (usually annual) performance report and approximately 2300 grantees whose project periods have ended will use this form as a final performance report. The annual burden hours per response is estimated to average 22 hours for *interim* performance reports and reflects the estimated time grantees spend reporting on project progress and performance and addressing administrative requirements.

The annual burden hours per response is estimated to average 23 hours for *final* performance reports and reflects the estimated time grantees spend reporting on project progress and performance and addressing administrative requirements. It is estimated that it takes respondents slightly longer to complete the final performance report than the interim report because the ED 524B requires final performance report respondents to provide additional summary information for the entire project period relating to project impact and success. The burden hour

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averages for annual and final performance report respondents listed above are based on a range of 19 to 25 hours to complete the ED 524B.

Annual Burden Hour Calculations for the ED 524B:

Burden Hours for ED 524B when Used as an Annual Performance Report: 22 hours/response X 5295 responses/year = 116,490 total annual burden hours.

Burden Hours for ED 524B when Used as a Final Performance Report: 23 hours/response X 2300 responses/year = 52,900 total annual burden hours

Total Annual Burden Hours for ED 524B: 116,490 burden hours (annual performance report) + 52,900 burden hours (final performance report) = 169,390 total annual burden hours.

Total Annual Cost Burden to Respondents for the Grant Performance Report, ED 524B

169,390 total burden hours x \$25/hour = \$4,234,750

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

No start-up costs.

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

Total Annual Cost to the Federal Government for Grant Performance Report, ED 524B: \$1,000,004

The total annual cost is based on the following:

ED 524B as Annual Performance Report: 3 hours per response x 5295 responses x \$41.78/ hour (GS-12 hourly rate) = \$663,675

ED 524B as Final Performance Report: 3.5 hours per response X 2300 responses X \$41.78/hour (GS-12 hourly rate) = \$336,329

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

The information collection is not a new collection. There are no start-up costs.

The total burden hours for the 1894-0003 collection are being increased from 121,900,400 to 169,390 hours due to an increase in the number of

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applications. This change is caused by changes in budget and grant priorities. Some programs have decided to use different reporting forms including most programs in IES. Based on projected program usage of the ED 524B for FY 2021 and the following two fiscal years, we are requesting 169,390 total annual burden hours for the ED 524B. This is an adjustment of burden hours.

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.