

**Supporting Statement for the
Application for Grants under the
Veterans Upward Bound Program for
Federal TRIO Programs
Higher Education Act of 1965, as amended, Title IV-A**

- 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 U.S. Department of Education is requesting a reinstatement with change of the application used to make new grants under the Veterans Upward Bound (VUB) Program.

The application will be used to conduct the Fiscal year (FY) 2022 competition for new awards and collect data under the VUB Program. The VUB program provides grants to institutions of higher education, public and private agencies and organizations, community-based organizations with experience in serving disadvantaged youth, combinations of such institutions, agencies and organizations, and secondary schools. VUB provides grants to projects designed to prepare, motivate, and assist military veterans in the development of academic and other skills necessary for acceptance into and success in a program of postsecondary education.

The reinstated application would include supplemental information on the minimum number of participants, required and permissible services or activities, outcome criteria used in assessing prior experience, and selection criteria, as well as describe the processes and procedures for the second review of unsuccessful applications.

The VUB Program grant competition is authorized by Title IV, Part A, Section 402A, of the Higher Education Act of 1965, as amended by the Higher Education Opportunity Act (HEOA); 20 U.S.C. 1070a-13 and governed by the program regulations in 34 CFR Part 644; and the Education Department General Administrative Regulations (EDGAR), Parts 74, 75 (except for §§ 75.215-75.221), 77, 79, 80, 82, 84, 85, 86, 97, 98 and 99.

<http://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 application package requests programmatic and budgetary information needed to evaluate new applications and make funding decisions, based on the authorizing statute, program regulations, Uniform Guidance and EDGAR. Failure to collect this information would prevent the awarding of appropriated funds; essential information would not be available for evaluating the applications in accordance with the statute and regulations.

- 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.**

For FY 2022, as a part of the Department's goal to increase the electronic submission of applications, applications for grants under the VUB Program will be submitted electronically via the Grants.gov portal. We estimate that the Department will receive 95 percent of the applications electronically.

The application package has been prepared in a format for easier and faster posting of information on the Web. Prospective applicants will be able to view and download the application through the FIND function on Grants.gov at <http://www.Grants.Gov>.

- 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 submitted in the application is unique to each respondent, no duplication exists as far as can be determined. There is no other collection instrument available to collect the information that is requested.

- 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 involve 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 Department uses this information to make new multi-year grant awards only. Collection occurs once during a competition year. Applicants are only required to respond to this information collection once in each grant cycle. If this information is not collected or is collected less frequently, the Department would not be able to evaluate applications and make funding decisions based on the provisions in the authorizing statute and the program regulations.

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.**

No information will be collected in a manner covered under any of the special circumstances outlined.

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.

The Department will solicit comments on this information collection through a 30-day notice in the Federal Register, pursuant to 5 CFR 1320.8(d), upon submitting the collection to OMB. A summary of any comments received will be shared with OMB. The Department will also solicit informal views and comments from persons outside the Department during yearly national and regional educational conferences.

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 any payments 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 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, 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

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)

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.

There is no assurance of confidentiality.

- 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 application does not include questions about sexual behavior and attitudes, religious beliefs, or other items 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 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)
Application (public)	N/A	N/A	180	180	34	6,120	Professional: \$30/hr (+ overhead) Clerical: \$12/hr (+ overhead)	Professional: \$162,000 (+ \$81,000) Clerical: \$8,640 (+ \$4,320)
Application (private)	N/A	N/A	10	10	34	340	Professional: \$30/hr (+ overhead) Clerical: \$12/hr (+ overhead)	Professional: \$9,000 (+ \$4,500) Clerical: \$480 (+ \$240)
Second review (public)	N/A	N/A	8	8	2	16	Professional: \$30/hr (+ overhead) Clerical: \$12/hr (+ overhead)	Professional: \$240 (+ \$120) Clerical: \$96 (+ \$48)
Second review (private)	N/A	N/A	2	2	2	4	Professional: \$30/hr (+ overhead) Clerical: \$12/hr (+ overhead)	Professional: \$60 (+ \$30) Clerical: \$24 (+ \$12)
Annualized Totals	x	x	200	200	x	6,480	x	= \$180,540 (wage) + \$90,270 (overhead) = \$270,810

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.

The total estimated burden hours for this collection of information are 6,480 hours. We estimate approximately 200 respondents, which includes 190 original respondents and 10 respondents under the second review process. Applications are submitted annually during a competition year.

The regulations include a formal second review process for unsuccessful applicants that fall within the funding band. We estimate that approximately 10 applications will score within the funding band, resulting in 20 additional burden hours from the previous applications (10 applications received x 2 hours = 20 hours).

Estimated number of respondents under the first review	190
Estimated preparation time under the first review	34 hours
Estimated burden hours under the first review	6,460 hours
Estimated number of respondents under the second review	10
Estimated preparation time under the second review	2 hours
Estimated burden hours under the second review	20 hours
Total estimated burden hours	6,480

Affected Public
 (Estimated Burden Hours):

Public, State, Local Institutions	180 respondents x 34 hours = 6,120 estimated burden hours
Private Non-Profits, For-Profits	10 respondents x 34 hours = 340 estimated burden hours
Total Estimated Burden Hours	6,460 hours

(Estimated Burden Hours for Second Review):

Public, State, Local Institutions	8 respondents x 2 hours = 16 estimated burden hours
Private Non-Profits, For-Profits	2 respondents x 2 hours = 4 estimated burden hours
Total Estimated Burden Hours for Second Review	20 hours

Total Affected Public Estimated Burden Hours.....6,480

Estimated Cost to Respondents for Regular Submission

Professionals: 190 personnel x 30 hours x \$30 per hour = \$171,000 Overhead at 50% of salary = \$85,500	\$256,500
Clericals: 190 personnel x 4 hours x \$12 per hour = \$9,120 Overhead at 50% of salary = \$4,560	\$13,680
<i>Total estimated staff costs to respondents</i>	\$270,180

(a) One time cost to applicant: Use of computer equipment to search for data and generate application in required format. Computer time is \$200 and printing is \$10. (190 applicants x \$210)	\$39,900
(b) Operation Cost: Annual cost to applicant to find and maintain application materials is \$100. (190 applicants x \$100)	\$19,000
<i>Total estimated annual costs to respondents</i>	\$58,900

Total Annual Costs to Respondents: \$329,080

(Staff Costs: \$270,180 + Annual Costs for Responding: \$58,900)

Estimated Cost to Respondents for Appeals Submission

Professionals: 10 personnel x 1 hour x \$30 per hour = \$300 Overhead at 50% of salary = \$150	\$450
Clericals: 10 personnel x 1 hour x \$12 per hour = \$120 Overhead at 50% of salary = \$60	\$180
<i>Total estimated staff costs to respondents for appeals</i>	\$630
(a) One time cost to applicant: Use of computer equipment to search for data and generate appeal in required format. Computer time is \$200 and printing is \$10. (10 applicants x \$210)	\$2,100
(b) Operation Cost: Annual cost to applicant to compile materials for appealing is \$100. (10 applicants x \$100)	\$1,000
<i>Total estimated annual cost to respondents for appeals</i>	\$3,100

Total Annual Costs to Respondents for Appeals: \$3,730

(Staff Costs: \$630 + Annual Costs for Responding: \$3,100)

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	: 0
Total Annual Costs (O&M)	: 0
<hr style="width: 20%; margin: 0 auto;"/>	
Total Annualized Costs Requested	: 0

Annual Costs to Respondents (capital/start-up, and operation and maintenance): The total for the capital and start-up cost components for this information collection is zero. This information collection will not require the purchase of any capital equipment nor create any startup costs.

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.

Cost to Federal Government:

Cost for development and approval of clearance package	
Professional staff to develop clearance package (GS-14 employee) 160 hours x \$55 per hour	\$8,800
Overhead cost related to facilities, administration, and other indirect costs plus accrual of leave and fringe benefits @ 50% salary	\$4,400
Other Department staff to review and approve the request	

GS-15 Employee	\$630
OMB Review 8 hours x \$45 per hour = \$360 x 50% overhead = \$180	\$540
<i>Estimated Sub-total</i>	\$14,370
Cost for Federally-supervised review of applications	
Outside field reviewers – 57 VUB readers @ \$1,100 each	\$62,700
Processing applications – staff (18 staff x 40 hours x \$48 per hour = \$34,560) (Overhead cost: \$34,560 x 50 percent = \$17,280)	\$51,840
Contractor logistical support for workshops, archiving prior unfunded applications, application processing, field reading and slate preparation (2 weeks-reading)	\$16,046
Staff time for conducting supervised review (2 weeks x 5 control reviews, and 18 panel chairpersons) (18 staff x 80 hours x \$48 per hour = \$69,120) (Overhead cost: \$69,120 x 50 percent = \$34,560)	\$103,680
Staff time for generating slate (3 staff x 40 hours x \$48 per hour = \$5,760) (Overhead cost: \$5,760 x 50 percent = \$2,880)	\$8,640
Staff time to review and approve funding recommendations (60 awards x 4 hours per award x \$48 per hour = \$11,520) (Overhead cost: \$11,520 x 50 percent = \$5,760)	\$17,280
Staff time to generate, approve, and issue grant awards (60 awards x 6 hours per award x \$48 per hour = \$17,280) (Overhead cost: \$17,280 x 50 percent = \$8,640)	\$25,920
<i>Estimated Sub-total</i>	\$286,106
Total estimated cost to government (competitive year)	\$300,476

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		6,480	
Total Responses		200	
Total Costs (if applicable)			

This collection package is a reinstatement with change. 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.**

Results of collected information will not be published for statistical purposes.

- 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.**

The Department will display on the form the expiration date for the OMB approval as required.

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

There are no exceptions to the certification statement.