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 Office of Postsecondary Education (OPE) is requesting an extension of the previously approved application which will be needed for future competitions for new awards under the Minority Science and Engineering Improvement Program (MSEIP).

The authorizing statute for this program, Title III, Part E, Subpart 1, Sections 350-365 of the Higher Education Act of 1965, as amended (HEA), and the governing regulations (34 CFR Part 637) require the collection of this information to determine the applicant's eligibility.

Link to applicable legislation & regulations:
http://www2.ed.gov/programs/iduesmsi/legislation.html.

There are limited changes to the application since OMB's last review and approval of the form, including re-estimation of the burden hours per respondent, updates to basic information such as names and dates, and inclusion of current versions of standard language.

The collection of the information requested on the proposed application form is necessary to allow 2-year and 4-year, public and private, nonprofit institutions of higher education; nonprofit science-oriented organizations; and professional scientific societies to apply for grant funds under MSEIP.

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.**

Applications for grants under the Minority Science and Engineering Improvement Program are submitted electronically using the Grants.gov Apply site (Grants.gov). The information collected is gathered electronically through Grants.gov for the Department of Education for the purpose of obtaining programmatic and budgetary information needed to evaluate applications and to *make funding decisions based on the authorizing statute and the published selection criteria. This collection will be conducted annually, based on availability of funding for new grants under Title III, Part E, of the HEA.*

Notably, without the collection of this information, the Department cannot properly screen applicants for eligibility that apply for MSEIP grants under Title III, and therefore cannot award new grants for which Congress has appropriated funds under this program.

The program staff and peer reviewers will use the information to evaluate applications and make funding decisions.

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.**

OPE is committed to the reduction of paperwork. Electronic submission has reduced the burden for both the applicants and Department staff as it streamlines the application preparation, submission, and review process. Collection of information involves the electronic submission of responses via 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.**

The information submitted in each application is unique to each respondent. Moreover, the information changes annually. No other existing information collection can serve the purposes described in item 2.

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.**

Small businesses or small entities would not be impacted by this collection.

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.

This application will be used by those applicants that desire to apply for new awards under MSEIP. If this information is not collected, grants cannot be awarded in accordance with the guidelines outlined in the Title III, Part E legislation. If the collection were not conducted annually, appropriated funds could not be spent.

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.**

There are no special circumstances that would require the collection to be conducted as outlined above in question 7.

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.

A notice for 30-day public comment will be published in the Federal Register. Program staff will respond to any questions or comments resulting from the publication of the information collection in the Federal Register as required by 5 CFR 1320.8(d).

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

No gifts or payments will be provided 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

[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

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.

The Department's disclosure policies adhere to the provisions of the Privacy Act and no assurances of confidentiality are provided.

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.

Questions of a sensitive nature are not included in this information collection.

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**

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)

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)
Public	N/A	N/A	130	130	160	20,800	$50	$1,040,000
Private	N/A	N/A	20	20	160	3,200	$50	$160,000
Annualized Totals	x	x	150	150	x	24,000	x	$1,200,000

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.
After careful examination of the estimated burden hours per respondent, we determine that 40 hours (equivalent to 1 week to complete the application) was an unrealistic value, therefore, we updated the burden hours appropriately to 160 hours (4 weeks).

Estimated ***burden hours*** *for this collection of information are 160 hours per respondent (4 weeks X 40 hours) and we estimate 150 respondents. Therefore, we expect an estimated total of 24,000 burden hours per annual submission. (150 X 4 X 40= 24,000 burden hours)*

We expect approximately 130 responses from public institutions and approximately 20 responses from private institutions. We estimate the cost per respondent for the burden to be $50/hour X 24,000 burden hours = $1,200,000. We estimate the cost for 130 applicants from public institutions to be approximately $1,040,000 and the cost for 20 applicants from private institutions to be approximately $160,000. The estimates provided are based on past experiences with the use of the form.

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 :

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 and will not create any start-up 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 the Federal Government for MSEIP		
Version 2 3.16.2022		
A professional staff to develop clearance package (Program Manager)	GS-14 employee: 75 hrs. @$40 per hr.	$3,000
Overhead cost related to facilities, administration, and other indirect costs plus accrual of leave and fringe benefits	overhead = $3,000 x 50%	$1,500
Other Department staff to review and approve the request: GS-15 employee (Director) and GS-14 employee (Team Leader) for final review and approval	GS-15 employee: 10 hours @ $60 per hr.	$600.00
	GS-14 employees (attorneys, front office), 75 hrs. @ $40 per hr. (Combined employees instead of counting individuals)	$3,000.00
Website development costs, including posting abstracts, awards, pre-application information	10 hrs. @ $40 per hr.	$400.00
Combined overhead costs for other Department staff and website development	overhead = ($600 + $3,000 + $400) x 50%	$2,000.00
Contractor logistical support for workshops, application processing, reviewers/alternates, field reading and slate preparation	Assuming 1% of appropriation and reduction of unused funds (No overhead required)	$133,700.00
Staff time for conducting supervised review	3 weeks x 3 control room and 10 panel monitors + Competition Manager (14 staff x 120 hrs. x $40/hr.)	$67,200.00
	overhead = $67,200 x 50%	$33,600.00
Staff time for generating slate	2 staff x $40 per hr. x 60 hrs.	$4,800.00
	overhead = $4,800 x 50%	$2,400.00
Staff time to review and approve funding recommendation and generate, approve, and issue grant awards	5 staff x 8 hrs. x $40/hr.	$1,600.00
	overhead = $1,600 x 50%	$800.00
Annual Monitoring Cost	1 staff x 30 hrs. per award x 54 awards x $40/hr.	$ 64,800.00
	overhead = $64,800 x 50%	$ 32,400.00
Total Annual Government Estimated Cost		**$351,800**

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			16,000
Total Responses			-50
Total Costs (if applicable)			

This is an extension of a previously approved collection. All burden has been recalculated to reflect a correction to the current estimate in burden hours. This results in an adjustment in burden and responses from 40 hours (1 week) to 160 hours (4 weeks) and from 200 responses to 150 responses. The total burden and responses for this collection are 24,000 hours and 150 responses.

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 the collected information will not be published.

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.

Not applicable. This report will display the expiration date for the OMB approval of the information collection.

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

Not applicable. There are no exceptions to the certification statement.