Tracking and OMB Number: (XX) 1840-NEW
Revised: 4/26/24

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.**

   This new collection of information via an application process is necessary because the U.S. Department of Education (Department) is developing a new recognition program to honor institutions of higher education that are supporting student success by conferring affordable credentials of value that lead to economic mobility while enrolling student bodies reflective of their communities - including students from underserved populations.

   To ensure the program reaches those most deserving of recognition, the Department requires an application that will collect information that will allow reviewers to fully understand institutions' efforts to promote student success in order to evaluate and select institutions to receive the award, specifically:

Why is Student Success a Priority for Your Institution?

1. Please explain:
   a. Why and when your institution made a commitment to making student success a campus-wide priority including for underserved populations;
   b. How your institution defines success in the context of your mission, student population, and the communities you serve; and
   c. How your institution supports a culture of success from leadership to faculty to staff to students themselves.

How Does Your Institution Execute its Success Strategy?

2. Please explain:
   a. What your institution's specific student success goals are, including for underserved populations, and how you measure them;
   b. What key policies and practices your institution uses to reach these goals; and

   c. How your institution implements an intentional, scaled, and sustainable campus-wide success strategy, including resources.

What is the Impact of Your Institution's Student Success Strategy?

3. Please explain:
   a. How your institution uses data, evidence, and evaluation to drive your student success strategy and support continuous improvement;
   b. How your institution has progressed against your student success goals over at least the last five years including for underserved populations;
   c. How (up to five) key practices, programs, or policies have demonstrably contributed to the impact of your student success strategy.

This activity is authorized under the following Program Authority: 20 U.S.C. 3402 and is not related to any legal requirements nor required rulemaking.

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 new application will be used by the Department to determine the list of semi-finalists based on peer reviews of the applications, which will then be used to determine finalists and ultimately, winners of the new Postsecondary Success Recognition Program. This is planned as an annual activity.

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.

We plan to either use an electronic portal or a customized email inbox for the submission of applications for the recognition program, both of which have been used for other award programs at the Department. Given the short length of the application and its narrative format, the application does not lend itself to further automation.

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 Department plans to use publicly-available data (e.g., Integrated Postsecondary Education Data System, College Scorecard) to identify institutions eligible to submit the application, which will reduce burden because institutions will not have to submit these data as part of the application process nor will they go through the process to apply if they are ineligible.

Since this is a new program, there is no previously collected information from the Department that would be relevant for this recognition program other than the quantitative data sources that we already plan to use for the eligibility list.

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.**

   The Postsecondary Success Recognition Program will not impact any small businesses as described above. While some small colleges and universities will likely opt to apply for the program, even small colleges and universities have hundreds of employees, which does not seem to fit the above.

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.**

   If approval to collect this information is not granted, the Department will be unable to recognize colleges and universities that foster success among their students, missing an opportunity to highlight colleges and universities who make good use of federal Pell Grant and student loan funds to increase opportunities for and the earning potential of their students. There are no technical or legal obstacles to reducing burden though the application was streamlined to ask the fewest number of questions to ascertain the information needed.

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 OMB approval pursuant to the conditions described above.

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.

Three unique public comments were provided for FR Doc # 2024-09675 Docket: ED-2024-SCC-0067. The first commenter focused on an unrelated topic. The second commenter made several erroneous statements about the recognition program due to confusion with the Postsecondary Student Success Grant program. The second commenter did suggest that institutions should attest their compliance with all applicable laws, not just civil rights laws, as part of the eligibility process. A change was made to the form as a result. The third commenter made suggestions related to the recognition program that were already addressed in the application and/or will be addressed through other components of the program, not the application. The commenter did not agree with a component of the program related to post-college outcomes, but that is a key component of the program. For more details, please see the attached document.

As with the 60-day notice, we will comply with all stated requirements for the 30-day notice period.

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

No payment or gifts will be provided to nominators or awardees for this recognition program.

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 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.**

[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)

This is the Privacy Notice included on the application form developed by our Privacy Office on 4/19/2024: The personally identifiable information (PII) requested on this form is collected through authorization under the Higher Education Act, which allows the U.S. Department of Education to recognize institutions that serve as engines of economic mobility by supporting all students to complete affordable credentials of value that prepare them well to participate in the workforce, their communities, and our democracy. The purpose of collecting your PII is to identify you as a point of contact for your institution. The information you provide is voluntary, however, the form will need to be filled out completely to be considered. While your information will not normally be disclosed outside of the Department, there may be circumstances where information may be shared with a third party, such as for media coverage, Freedom of Information Act request, court orders, or subpoena, or if a breach or security incident would occur affecting the system.

There is no system of records associated with this process.

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.

This collection does not ask questions of a sensitive nature.

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.

The information in the application is provided by a staff member of the postsecondary institution applying for the recognition program. The total number of respondents is estimated to be 150. The total number of responses is one response per respondent for a total of 150 responses. Respondents are expected to spend 10 hours per response. The total burden hours are 1,500 hours. The total number of burden hours is estimated to be 1,500 hours annually. The mean hourly wage for Education Administrators in Colleges, Universities, and Professional Schools was $66.49 as reported in May 2023 by the U.S. Department of Labor, Bureau of Labor and Statistics, at the link provided. This is the most appropriate labor category for the likely respondent to the application. The total annual burden hours at this rate represents $99,735.

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)
			150	150	10	1,500	$66.49	$99,735
Annualized Totals			150	150		1,500		$99,735

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.

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 :

This collection does not require Capital/Start-up cost or equipment and maintenance 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.

Based on similar programs at the Department, we estimate that peer reviewers will spend an average of 60 minutes per application to review this information. The total number of nominations is estimated to be 150. We estimate total hours of review for these applications to be 150 hours. We expect to have 10 peer reviewers who will receive a standard honorarium of $1,000 each for a total of $10,000.

Department staff will review semifinalist and finalist applications, which will total about 15. We estimate that Department staff will spend an average of 60 minutes per application to review this information, so the total number of hours is estimated to be

30, including reviews by leadership for finalists. Different staff members at different pay levels ranging from General Schedule (GS)-13 to GS-14 are likely to participate in review, so we will use $65 as the average hourly rate, which is approximately the average hourly rate for a GS-13 to GS-14 level for a Federal employee in Washington, DC. At $65 per hour, the total hours of review come to an annual cost of $1,950 to the Federal government.

The total cost to the federal government is estimated at $11,950.

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		1,500	
Total Responses		150	
Total Costs (if applicable)			

This is a new 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.

The Department will publish information on recognition recipients only. The Department does not intend to publish the data contained in the applications, except with explicit permission from the program winners only for media purposes. The Department anticipates that the applications will be available in September 2024, due in October 2024, and recognition recipients will be announced publicly either by the White House or by the Secretary in January of 2025 and then annually thereafter.

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 expiration date for OMB approval of the information collection will be displayed.

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

We do not propose any exceptions to the certification statements identified in the Certification of Paperwork Reduction Act.