Tracking and OMB Number: (XX) 1840-0748
Revised: 9/17/24

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.**

   The U.S. Department of Education (Department) is requesting an extension of the previously approved GAANN performance report package that expires on September 30, 2024. The goal of the program is to increase the number of students with degrees in areas of national need by providing fellowships through academic departments of institutions of higher education to assist graduate students of superior ability who demonstrate financial need.

   There are three versions of the performance report that are part of this package: the Annual Report, Final Report, and Supplement to the Final Report. GAANN grants are awarded for a period of three years. Grantees are required to submit an annual performance report in May for each budget period of the grant, and a final performance report up to 120 days after the grant expires. The annual performance report asks for information specific to the budget year for which the report is being submitted. The final performance report asks for information specific to the third budget year of the grant, and also requires the grantee to update the educational status of all students who have received a GAANN fellowship at any time during the project period. In addition, GAANN grantees are required to submit a supplemental report two years after submission of the final performance report. This information allows the Department to track the number of GAANN fellows who obtain their graduate degree and who are employed in the area of need.

   The performance reports report race and ethnicity data at an individual level. This performance report is in alignment with OMB's 1997 Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15), as well as with current program definitions of what is considered a minority for purposes of being a student from traditionally underrepresented backgrounds under 34 CFR 648.9. Further revisions to race and ethnicity data collected under these performance reports will be updated in accordance with the “Revisions to OMB's Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity” issued on March 29, 2024, as soon as possible while addressing statutory and regulatory requirements of the program, but will be completed no later than March 28, 2029.

The information is collected under the authority of Title VII, Part A, Subpart 2, Section 711 of the Higher Education Act of 1965, as amended; the program regulations in 34 CFR 648; and under 2 CFR 200.328 (Monitoring and reporting program performance).

The link to the statute: http://www.law.cornell.edu/uscode/text/20/chapter-28/subchapter-VII/part-A/subpart-2.

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 Department uses the data collected from the performance reports to: (a) monitor grantee compliance with program regulations (34 CFR 648) in administering grant funds and selecting GAANN fellows; (b) collect the quantifiable data needed to evaluate project outcomes; and (c) assist in providing technical assistance to strengthen individual projects.

   The performance reports are used to collect programmatic data for purposes of annual reporting, budget submissions to OMB, Congressional hearings, Congressional inquiries, and inquiries from higher education interest groups and the general public.

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.**

   Grantees use a web-based system to electronically retrieve and submit the requested information in the performance report (https://gaann.ed.gov). The electronic version of the performance report automatically saves grantee information and student level data entered in one year for use in the following year. Therefore, the data does not need to be re-entered, only updated when changes occur. This assists in reducing the burden on grantees, particularly with regard to both the final performance report and the supplemental report, which require updates to the educational and employment status of all students that have been funded over the life of the grant.

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 performance reports is specific to the GAANN grant project, there is no duplication. There is no other collection instrument available to collect the information necessary to meet the purposes described in item 2 above.

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 program provides fellowships, through academic departments and programs of Institutions of Higher Education, to assist graduate students with excellent records who demonstrate financial need and plan to pursue the highest degree available in their course study at the institution in a field designated as an area of national need. There is no impact on small businesses or 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.**

   Collection of information is annual and the collection of information helps the agency ensure accountability for the investment of public funds. Collection of information on a less frequent basis would impede the Department's ability to determine if the grantee is making satisfactory progress in meeting the goals and objectives proposed in its initial application for funds.

   Further, failure to collect this information would hinder the Department's ability to carry out its required responsibility to perform an overall assessment of the GAANN Program and its impact.

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 cause this information collection to be conducted in such a manner, except for the five-year record-keeping retention period, which is necessary since the statute requires that the grantee provide five years of support to students, only three years of which are funded by the GAANN grant.

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 published a 60-day Federal Register notice as required by 5 CFR 1320.8(d) on July 17, 2024, to solicit comments on the information collection prior to submission to OMB. One comment was submitted but it was not relevant to the collection.

A separate 30-day Federal Register notice will be published to solicit public comment on the collection. The Department will summarize comments received in response to this notice and describe actions taken by the agency in response to these comments.

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 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 program regulatory requirement for assuring confidentiality, except as provided by EDGAR (34 CFR 75.740 – Privacy), and the Family Educational Rights and Privacy Act of 1974.

The collection instruments include the following privacy notice:

The information you provide is voluntary, however, you will need to fill in all the fields in order for the performance report to be complete, unless noted otherwise. While your information will not be disclosed outside of the Department, there may be circumstances

---

[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)

where information may be shared with a third party, such as a Freedom of Information Act request, court order or subpoena, or if a breach or security incident would occur affecting the system.

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 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.

The package includes three performance reports - an annual performance report submitted in years one and two of a grant, a final performance report submitted in the third year of a grant, and a supplemental report submitted two years after the grant concludes. The estimated total reporting burden for these reports is indicated below. This includes a total of 291 respondents, each with an estimated response time of 11.25 hours per report. The total burden hours have not changed since the previous collection package was submitted for clearance.

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)
APR- Public	NA	NA	223	223	11	223x11x2= 4906	$45/hr - professional $15/hr – Clerical	$110,385 + $36,795= $147,180
APR - Private	NA	NA	68	68	11	68x11x2= 1496	$45/hr - professional $15/hr – Clerical	$33,660 + $11,220= $44,880
FPR – Public	NA	NA	223	223	12	2676	$45/hr - professional $15/hr – Clerical	$60,210 + $20,070 = $80,280
FPR – Private	NA	NA	68	68	12	816	$45/hr - professional $15/hr – Clerical	$18,360 + $6,120 = $24,480
Supplemental – Public	NA	NA	223	223	11	2453	$45/hr - professional $15/hr – Clerical	$55,215 + $18,390 = $73,605
Supplemental - Private	NA	NA	68	68	11	748	$45/hr - professional $15/hr – Clerical	$16,830 + $5,610 = $22,440
Average Annualized Totals	NA	NA			[(11x2)+ 12+11]/4	(APR+FPR +Sup)/4		
Public			223	223	11.25	2508.75		$75,266.25
Private			65	68	11.25	765		$22,950

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 :

There are no other costs to the respondent except those that would be customary and usual business practices.

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 the number of estimated staff needed to review the performance report package, the estimated cost to the Federal Government is revised to account for an increase in personnel costs:

Task	Cost	Hours	Number of Staff	Hours Total	Total Cost
Securing OMB approval once every 3 years	$54/hr	15	4	60	$3,240
Other Departmental staff to review and approve the request	$60/hr	5	3	15	$900
Estimated OMB review	$60/hr	8	2	16	$960
Review of reports and analysis of data	$54/hr	120	4	480	$25,920
Total Annual Cost					**$31,020**

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.

No material changes were made to the reports that would change the burden currently on file.

	Program Change Due to New Statute	**Program Change Due to Agency Discretion**	**Change Due to Adjustment in Agency Estimate**
Total Burden			
Total Responses			
Total Costs (if applicable)			

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 information collected from the performance reports will be analyzed to determine if each grantee is meeting the approved goals and objectives for the project. Further, the information will be aggregated into a single program report and evaluated to determine if the program as a whole is meeting its purpose. The aggregated data in the report will include demographic profiles of project participants, interim and final project outcomes (such as progress towards and attainment of the Masters or Doctoral degrees), and program profiles of types of services provided.

The data will be reported at the conclusion of the three-year grant period. Grants are scheduled to expire in September of the third year of funding. Final reports are then due to the program office 90 days after the expiration of the grant. Program staff will analyze the data for reporting in January. No complex analytical or statistical techniques will be used.

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 forms 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.