Description of Today's TRIO Programs and Proposing Options for Future Outcome Evaluations

Supporting Statement Part A: Justification

July 2026

Contents

Exhibits

Part A. Justification

This information collection request seeks OMB approval for a new information collection to support a national study of TRIO programs which includes two components: (1) a descriptive study of program operations, and (2) assessing feasibility of conducting a rigorous impact evaluation of each TRIO program. This new information collection fulfills the descriptive study goals and contains a component to inform the feasibility study.

A.1 Circumstances Necessitating the Collection of Information

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Background

The U.S. Department of Education (ED), through the Institute of Education Sciences (IES), is requesting clearance for a new information collection to support a national descriptive study of the Federal TRIO Programs. The TRIO Programs [Upward Bound (UB), Upward Bound Math-Science (UBMS), Veterans Upward Bound (VUB), Talent Search (TS), Student Support Services (SSS), Educational Opportunity Centers (EOC), and Ronald E. McNair Postbaccalaureate Achievement (McNair)] are designed to increase access to and success in postsecondary education for individuals from disadvantaged backgrounds, including low-income, first-generation, and disabled students. While ED collects some outcome data through Annual Performance Reports (APRs), these administrative data do not provide sufficient information on services offered, variation in services offered across grantees, participant engagement intensity, and costs for services.

This information collection is necessary to fill these gaps and to provide ED and Congress with systematic, up-to-date descriptive information on how TRIO programs operate across different contexts, how funds are allocated and used, and how participation translates into improved outcomes. These gaps are especially pressing given today's educational landscape (Irwin et al., 2024), which is shaped by shifting student demographics, rising college costs, and new challenges in degree persistence and completion. The descriptive study is intended to add to the existing evidence base on TRIO programs by producing a set of more comprehensive findings that better reflect the current educational landscape, student populations, and grantees. This information collection will also contribute to the feasibility study, which is focused on assessing what types of rigorous impact evaluation could be conducted in the future to assess the effectiveness of the services delivered by TRIO programs.

The proposed information collection is intended to address five overarching research questions:

1. What services do grantees provide and how much does this vary across grantees within programs?
2. What share of participants receives each service and how intensively?
3. How much do different types of services cost?
4. What is the cost per participant on average for each type of service and how much does this vary across grantees within programs?
5. To what extent do grantees track implementation and interim progress and to what extent do they use these measures to improve?

To address these research questions and fulfill the information collection objectives, the study team will use the survey instrument identified in Appendix A. TRIO program grantees will be contacted and invited to take the survey using the outreach materials, telephone scripts, and respondent frequently asked questions document included in Appendix B.

Legal and administrative authority

The Institute of Education Sciences (IES) was established under the Education Sciences Reform Act (ESRA) of 2002 (Public Law 107-279). Under this authority, IES supports rigorous research and evaluations of federal education programs and policies. The Consolidated Appropriations Act, 2022 further empowered ED to fund Higher Education Act (HEA) program evaluations. The Federal TRIO Programs are authorized under Title IV, Part A, Subpart 2 of the Higher Education Act of 1965, as amended.

The National Center for Education Evaluation and Regional Assistance (NCEE), within IES, is responsible for conducting evaluations to provide policymakers and practitioners with reliable evidence on the implementation and effectiveness of education programs. IES is authorized to collect data for research and evaluation purposes under the Education Sciences Reform Act of 2002 (ESRA), Title I, Part E, Section 183 (20 U.S.C. §9573). This study of TRIO programs is commissioned under this authority.

A.2 Purpose and Use of the Information Collection

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 purpose of this information collection is to describe the services offered, the intensity of services, and the cost of services, as well as gather information on how programs track participant progress/outcomes. Data will be collected by Decision Information Resources (DIR), the current contractor to IES, through a web-based survey administered to all active TRIO grantees, with two planned administrations.

Grantee survey round 1 (R1): This web-based survey will collect data from all grantees across seven TRIO programs in fall 2026. They will be asked about services provided; participation intensity and costs for each service; monitoring program implementation and interim progress; and screening and selection of participants and capacity constraints during the 2024-25 program year.

Grantee survey round 2 (R2): The same web-based survey will be administered to continuing grantees, as well as new grantees, in 2028. To the extent possible and to reduce burden, data from R1 of the survey will be pre-populated for grantees who participated previously, and they will be asked to confirm whether their responses have changed.

The study will produce reports and derivative products on findings from these surveys to inform Congress, the Department, and the field on the current landscape of TRIO programs. This data collection is an important part of a larger study that also includes a feasibility study to determine which research designs are feasible to conduct a rigorous impact evaluation of each TRIO program.

A.3 Use of Improved Information Technology

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden

To minimize respondent burden, this information collection will be conducted entirely through a secure, web-based survey system. The study team will program and administer the survey in Voxco – a Computer-Assisted Interviewing (CAI) system – with skip logic, validation checks, and the ability to save and resume at a later time. Where feasible and to further reduce burden, the study team will pre-populate survey items using existing administrative data (e.g., APRs and grant application information) and ask respondents to verify or update pre-filled information.

Eligible respondents that do not complete the web survey within a specified timeframe will be subsequently contacted by a telephone interviewer ("telephone prompting"). The interviewer will prompt the respondent to complete the survey online and will have the capability to send an email including the link to the web-based survey and unique PIN required to access the survey.

Web-based surveys and telephone prompting reduce burden as respondents are able to complete the survey at any time, save their responses and finish the survey at later date or time, and complete on any device, including computers or mobile devices.

A.4 Efforts to Identify Duplication

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 study team reviewed existing federal data sources, including APRs, grant applications, and prior evaluations, to identify potential duplication. Although APRs provide standardized outcome data, they do not capture detailed information on services offered, participation intensity and cost for each service, program implementation monitoring, and screening and selection of participants and capacity constraints. The study team will use data from existing sources to limit respondent burden and the duplication of data collection efforts. No other existing data source provides this information consistently across all TRIO programs. Therefore, the proposed collection does not duplicate existing data and is limited to information not otherwise available.

A.5 Collection of Information from Small Entities

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

TRIO grantees include institutions of higher education, school districts, nonprofit organizations, and other entities, many of which may qualify as small organizations or small government jurisdictions. Every effort has been made to minimize burden on these entities by limiting the collection to essential information, using a single web-based instrument, pre-populating items with existing data where possible, and tailoring survey pathways so respondents only answer questions relevant to their TRIO program(s), as shown in Appendix A.

A.6 Consequences of Not Collecting the Information or Collecting Less Frequently

Describe the consequence 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 this information collection were not conducted, IES would lack current, comprehensive information on how TRIO programs operate nationwide, how funds are used across diverse contexts, and how grantees monitor and define success. This would limit IES's and Congress's ability to assess program implementation, identify promising practices, and determine whether and how rigorous impact evaluations of the TRIO Programs are feasible. Collecting the information less frequently would reduce

IES's ability to capture changes over time in services offered, and participation and costs for each service.

A.7 Special Circumstances of Data Collection

Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines:

This data collection effort does not involve any special circumstances.

A.8 Federal Register Announcement and Consultation Outside the Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (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.8.1 Federal Register

A 60-day notice to solicit public comments was published in the Federal Register, Volume 91, No. 53, pages 13298-13299 on March 19, 2026. Two public comments were received. The first comment was non-substantive and did not require a response. The second comment was from the Council for Opportunity in Education (COE). It expressed concern about the design of the descriptive study and the survey instrument and made recommendations for a different approach to the study. The study team provided a response to their comments.

A 30-day notice will be published to solicit additional public comments.

A.8.2 Consultants

During the development of the study design and data collection instrument, the study team consulted with TRIO program staff and an Expert Advisory Panel (EAP) of TRIO practitioners and a subject-matter expert (Eric Bettinger) to obtain input on data availability, clarity of questions, burden, and relevance of proposed data elements. The EAP was convened in February 2026. Exhibit A.1 lists the EAP members who provided guidance and input on the data collection instrument.

Exhibit A.1. Expert Advisory Panel Members

Name	Title	Affiliation
Beth Akers	Senior Fellow	American Enterprise Institute
Michal Kurlaender	Professor of Education	University of California, Davis
Laura Perna	GSE Centennial Presidential Professor of Education	University of Pennsylvania

Lindsay Page	Annenberg Associate Professor of Education Policy, Chair of Education	Brown University
Bill DeBaun	Senior Director	National College Attainment Network
Aaron Brown	Executive Vice President	Council for Opportunity in Education

A.9 Payments or Gifts to Respondents

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

Respondents who complete the survey will be offered a $50 electronic gift card as a token of appreciation. The incentive is intended to support adequate response rates for a census-style survey of TRIO grantees, reduce the risk of nonresponse bias, and offset the time required to complete the survey.

Numerous studies have found that monetary incentives encourage responsiveness to surveys (McLaren Health Care, et al. 2023). This study concluded that monetary incentives enhance the response rate of surveys. Further research suggests that the size of the offered incentive will impact response rate and that tailoring estimates to specific survey modes and timing considering the target population is recommended (Mercer, et al. 2015). The proposed incentive amount is modest, consistent with incentives approved for surveys of similar length, and is not expected to unduly influence participation. Without an incentive, the likelihood of incomplete or delayed responses may increase, particularly given competing administrative demands on TRIO grantee staff.

A.10 Assurance of Confidentiality

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The study team will protect the confidentiality of all information collected for this study in accordance with the Education Sciences Reform Act of 2002 (20 U.S.C. §9573). Responses will be used only for statistical and research purposes. Reports prepared for this study will present findings in aggregate form and will not identify individual grantees or respondents. The collection will include limited business contact information (e.g., name, email address) for survey administration purposes only.

All data will be maintained in accordance with applicable federal privacy, confidentiality, and data security requirements, including the Privacy Act of 1974 (5 USC 552a), the Privacy Act Regulations (34 CFR Part 5b), the Freedom of Information Act (5 CFR 552) and its related regulations (41 CFR Part 1-1, 45 CFR Part 5b, and 40 CFR 44502).

Policies and procedures maintained at any facility operated by service providers under contract are designed to protect the privacy of data. All contract personnel are required to sign pledges to protect respondents' privacy. Respondent names and contact information are stored in a computer database that is separate from the database that stores survey responses. Additionally, privacy issues will be addressed in training sessions for all staff involved with the administration of the data collection instruments. Individual identifying information will be maintained separately from hardcopy collection forms and from computerized data files prepared for conducting the analysis.

Data will be analyzed on IES's secure servers by staff with the required security clearances. The study team will analyze data for purposes of program management and quality improvement. Reports that use these data will be handled in a manner that eliminates the possibility of compromising privacy. The study team will follow commonly accepted guidelines (what the Federal Committee on Statistical Methodology calls the Threshold Rule) and display only aggregated data when there are more than three cases in a cell table. When there are three or fewer cases in a cell table, tabular data will be presented by combining categories or suppressing cells to ensure the elimination of possible individual identities.

A.11 Sensitive Questions

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This 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 study will not include questions of a sensitive nature.

A.12 Estimated Response Burden

Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*
- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.*
- *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.*

The primary burden associated with this collection is the time required to complete the web-based survey, which we estimate to take approximately 70 minutes for each respondent to complete. The burden also includes time needed to gather and reference documents, such as budgets or other administrative records, as well as potential consultation with other staff members.

Estimates of the number of respondents, frequency of response, annual burden hours, and associated labor costs are provided below in Exhibit A.2. These estimates are based on findings from pretests with nine TRIO grantees conducted during the 60-day review period.

Exhibit A.2. Summary of Estimated Response Burden

Respondent Category	Population Size	Total Responses*	Hours per Respondent	Estimated Hours	Hourly Rate**	Monetized Value of Respondent Time
Round 1: 2024-2025 Grantees	3,441	1,720	1.77	3,044.4	$47.82	$145,583.21
Round 2: 2028 Grantees	3,400	1,700	1.77	3,009.0	$47.82	$143,890.38
Total	6,841	3,420	1.77	6,053.4	$47.82	$289,473.59

*Based on an estimated 50% response rate
**Based on BLS 2024 mean hourly rate for 11-9030 Education Administrators, All Other

A.13 Estimate of Total Capital and Startup Costs to Respondents

Provide an estimate for 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 already reflected on the burden worksheet).

There are no additional costs to the respondents for participating in the survey. All costs associated with contacting the respondents are borne by the Federal government through the data collection contractors.

A.14 Estimate of Annualized Cost to the Federal Government

Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated cost to the Federal government for this 54 month study—including establishing and convening an expert advisory panel; preparing OMB clearance forms; survey development, programming, administration, and incentives; data processing, analysis, reporting; and project management—is $2,544,559, or approximately $508,912 per year.

A.15 Reasons for Changes in Estimated Burden

Explain the reasons for any program changes or adjustments reported on the burden worksheet.

This is a request for a new collection of information.

A.16 Plans for Tabulation, Analysis, Publication, and Schedule

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 study team will analyze the survey data descriptively to produce national- and program-level summaries of TRIO funding allocation, services offered, intensity of participation and costs per service, and monitoring practices.

The reports and accompanying derivative products are expected to be completed in 2028, 2029, and 2030. Reports will be written to a technical audience, and derivative products will be developed for a non-technical audience. The reports will follow the January 2020 IES Style and Report guidance and/or any updated IES guidance and meet all 508 compliance requirements. Exhibit A.3 summarizes the timeline for data collection activities and reporting.

Exhibit A.3. Timeline for Data Collection Activities and Reporting

Activity	Date
Grantee Survey Round 1 data collection	October 2026 to December 2026
Grantee Survey Round 2 data collection	March 2028 to May 2028
Grantee Survey Round 1 report	January 2028
Grantee Survey Round 2 report	January 2029
Summative report	January 2030
Grantee Survey Round 1 derivative product	March 2028
Grantee Survey Round 2 derivative product	March 2029
Summative derivative products	March 2030

A.17 Approval to Not Display the Expiration Date for OMB Approval

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

IES is not requesting approval to omit the OMB approval number or expiration date. The OMB control number and expiration date will be displayed on all data collection materials, including the survey screens for the web survey and respondent outreach emails. During telephone prompting, interviewers will be able to provide the OMB number and expiration date at the request of any participant.

A.18 Exceptions to the Certification Statement

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

No exceptions are requested in the "Certification for Paperwork Reduction Act Submissions."

References

Irwin, V., Wang, K., Jung, J., Kessler, E., Tezil, T., Alhassani, S., Filbey, A., Dilig, R., & Bullock Mann, F. (2024). *Report on the Condition of Education 2024* (NCES 2024-144). U.S. Department of Education, National Center for Education Statistics. https://nces.ed.gov/pubs2024/2024144.pdf

McLaren Health Care, Michigan State University, Faculty of Medicine, Al-Azhar University, Faculty of Medicine, Zagazig University, Faculty of Medicine, Alexandria University, Faculty of Medicine for Girls, Al-Azher University, Detroit Medical Center/Sinai Grace Hospital, Wayne State University, Rochester Regional/Unity Hospital, The Ohio State University, University of Florida. (2023). Does usage of monetary incentive impact the involvement in surveys? A systematic review and meta-analysis of 46 randomized controlled trials. 10.1371/journal.pone.0279128.

Mercer, A., Caporaso, A., Cantor, D., and Townsend, R. (2015). How much gets you how much? Monetary incentives and response rates in household surveys. *Public Opinion Quarterly*, *79*, 105-129.