

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 Department of Education (Department) is requesting approval of a revision of the Student Support Services (SSS) Program Annual Performance Report (APR), which will expire on November 30, 2026 (OMB No.: 1840-0525). The APR has been revised to include the Competitive Preference Priorities used in the most recent competition for new awards (FY 2025). Further, the annual number of responses and total annual burden hours have been adjusted to reflect an increase in the size of the reporting universe.

The SSS Program provides Federal financial assistance in the form of discretionary grants to institutions of higher education for the purpose of providing academic and other support services to low-income, first-generation college students or college students with disabilities. These support services are intended to increase students' retention and graduation rates, facilitate their transfer from two-year to four-year institutions, and foster an institutional climate supportive of the success of low-income individuals, first-generation college students, or individuals with disabilities.

The information submitted in the annual performance report is used to meet several regulatory and statutory requirements.

Prior Experience (PE) Points

First, the data collected via the SSS APR is used to assign prior experience points as mandated by the SSS Program authorizing statute, Title IV, Part A, Subpart 2, Chapter 1, Section 402A(f)(3)(D) of the Higher Education Act of 1965, as amended, which states: *"For programs authorized under section 402D, the extent to which the entity met or exceeded the entity's objectives for such programs regarding—*

- (i) the delivery of service to a total number of students served by the program, as agreed upon by the entity and the Secretary for the period;*
- (ii) the extent to which the eligible entity met or exceeded the entity's objectives regarding the retention in postsecondary education of the students served by the program;*
- (iii) in the case of an entity that is an institution of higher education offering a baccalaureate degree, the extent to which the entity met or exceeded the entity's*

- objectives regarding the percentage of such students' completion of the degree programs in which such students were enrolled; or*
- (iv) in the case of an entity that is an institution of higher education that does not offer a baccalaureate degree, the extent to which such students met or exceeded the entity's objectives regarding—*
- a. the completion of a degree or certificate by such students; and*
 - b. the transfer of such students to institutions of higher education that offer baccalaureate degrees;*

The calculation of prior experience points is done on an annual basis using the data the project submits for the reporting period. As such, during a competition for new awards, the prior experience points are added to the average of the field readers' scores to derive a total score for an application. A slate of all applicants is developed on the basis of the total scores of the applications. Funding recommendations and decisions are based on the rank order of applicants on the slate. Therefore, the assessment of prior experience points is a crucial part of the overall application process.

Evaluation of Substantial Progress

Second, during non-competitive years, the reports are used to verify that grantees are making substantial progress toward the achievement of approved objectives prior to issuing continuation awards.

Performance Measurement

Third, the Department is committed to continually improving its management of programs and improving the educational outcomes of students. Improvements are guided by monitoring and assessing performance, improving the data used for these assessments, collaborating with stakeholders, implementing recommendations, and re-assessing performance. Providing data to the public is a key element in promoting improvement and collaborating with stakeholders. Therefore, to meet these goals the APR collects aggregate and quantifiable data needed to respond to the requirements of the Education Department General Administrative Regulations (EDGAR) in 34 CFR §75.110 - Information regarding performance measurement. The performance outcomes that are measured are:

- the postsecondary retention of project participants.
- in the case of a 4-year institution, the completion of a bachelor's degree within 6 years.
- in the case of a 2-year institution,
 - the completion of a certificate/associates degree within 3 years, and
 - the completion of a certificate/associates degree and transfer within 3 years.

Information is collected under the authority of Title IV, Part A, Subpart 2, Chapter 1, Section 402D of the Higher Education Act of 1965, as amended; the program regulations in 34 CFR Part 646; and the Education Department General Administrative Regulations (EDGAR) in 34 CFR 75.590 and 75.720.

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 to: (a) evaluate a grantee's accomplishments; (b) determine, in part, the number of prior experience points to be awarded to a grantee; and (c) aid in compliance monitoring.

In addition, the annual performance reports are used to collect programmatic data for purposes of annual reporting; budget submissions to OMB; Congressional hearings and testimonials; Congressional inquiries; and responding to 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.**

The data being requested allows the grantees to use computerized data systems to collect, retrieve, and report the requested information. A web-based software application has been developed for grantees to use to enter the data online and submit the entire report via the Internet. SSS Program grantees have been submitting the APR via the Internet since the 2000-2001 project year, and all grantees are currently required to submit the APR data via a web-based system.

- 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 report is unique to each respondent, no duplication exists. There is no other collection instrument that is available to collect the information that is being requested. The data collected in the APR are fundamental to the SSS program.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

This information collection does not involve small businesses or other small entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Performance information is collected annually. Collection of information on a less frequent basis is not feasible. These reports are used to determine whether the grantee is making satisfactory progress in meeting the goals and objectives proposed in its initial application, prior to awarding continuation funding. In addition, the information is needed to award prior experience points to grantees. Without this data collection, the Student Service Office would be unable to make new and continuation awards, comply with the prior experience provision of the authorizing statute, respond to the GPRA requirements, and develop improved policies for program administration.

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.**

With one exception, no information will be collected in the manner covered under any of the special circumstances outlined. The exception is that respondents are required to retain participant records for more than three years as required under CFR 74.53(b). In order to

assess the impact of the program services on participating students' academic progress, grantees are required to track the academic progress of all participants for a period of 4 years in the case of a two-year institution and 6 years in the case of a four-year institution.

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.

As applicable, the Department will publish the 60-day Federal Register notice as required by 5 CFR 1320.8(d) and solicit comments on the information collection prior to submission to OMB. A separate 30-day Federal Register notice will be published to solicit public comment on the APR following the 60-day Federal Register notice.

The Department will summarize public comments received in response to these notices 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 payment 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.

The Department's disclosure policies adhere to the provisions of the Privacy Act – PL 95-379, 5 USC 552a. There is no assurance of confidentiality with respect to grant-required reports; however, grantees are instructed to ensure that program participants are informed of their rights under the Privacy Act with respect to the disclosure of social security numbers. A disclosure statement is provided to students at intake or involving other activities that occur during their time with the SSS project.

Because the APR requests personal and confidential information on project participants, the secured website meets the Department of Education's data security standards for sensitive data, including password and site access procedures. Further, to ensure that the data is accessible only to authorized individuals and protected from unauthorized uses, a grantee must submit the participant level data via the Web application; under no circumstances should a grantee transmit the data to the Department or the APR Help Desk via e-mail.

A Privacy Act Statement is found at the very end of Section II of the SSS APR's record structure, and also in the General Instructions for the APR.

The System of Records Notice ("SORN") for the TRIO programs was published in the *Federal Register* on January 23, 2009 (74 FR 4165, 4166-4168).

The Privacy Impact Assessment ("PIA") for TRIO was published on May 21, 2025 and may be found at: <https://www.ed.gov/media/document/ope-trio-programs-annual-performance-reports-apr-110036.pdf>.

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.

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)

The APR form 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 performance reports are submitted annually. Each grant project submits one report per year. On average, 15.35 hours per respondent should be sufficient to gather information to complete the APR. This average 15.35-hour response burden is distributed across the 1,181 SSS projects for a total annual burden of 18,129 hours.

On average, each project is estimated to require 12.35 hours from a project director or other senior person, and 3 hours of effort from an administrative staff person to support the submission process. The project director's hours are valued at \$42 per hour and the support staff person's hours are valued at \$23 per hour.

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 sector	N/A	N/A	1,031	1,031	15.35	15,826	Project Director = \$42/hour	\$605,919
Private sector	N/A	N/A	150	150	15.35	2,303		\$88,155
Annualized Totals	N/A	N/A	1,181	1,181	15.35	18,129	Support staff = \$23/hour	\$694,074

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 respondents associated with this information collection. Grantees are required by program regulations to collect and maintain this information. The costs to transmit the data electronically via the web reflect 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.

The largest portion of the Government's cost is borne directly by the Department in designing the report form, securing clearance of the form, and in collecting, aggregating and disseminating the information.

Annual contract cost for development of APR Web application, Web-based data collection, Help Desk support, data processing, and grantee PE reports.	\$116,340
Analyses of data and preparation of national statistical reports.	\$177,000
Professional staff to update report form and prepare clearance package clearing performance report form: \$62.40 per hour X 120 hours Overhead (est. at 50%): 120 times \$31.20	\$11,232
Professional staff to review and edit reports for dissemination: \$62.40 per hour X 160 hours Overhead (est. at 50%): 160 times \$31.20	\$14,976
Other Department staff to review and approve the request: \$59 per hour X 10 hours Overhead costs (est. at 50%) 10 times \$29.50	\$885
OMB review (estimated): \$59 per hour X 8 hours Overhead costs (est. at 50%) 8 times \$29.50	\$708
TOTAL FEDERAL COST	\$321,141

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			385
Total Responses			25
Total Costs (if applicable)			

Total burden hours have been adjusted to reflect an increase in the size of the reporting universe (number of funded projects increased from 1,156 to 1,181). As such, total burden hours for this revised collection have increased from 17,744 to 18,129.

In addition, the collection has been updated to include the Competitive Preference Priorities used in the Fiscal Year 2025 competition for new awards. No change in burden is associated with this update.

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.

Collected information will be analyzed annually to determine if each grantee is meeting its approved goals and objectives and to award prior experience points. Performance measures and efficiency measures for SSS, based on data conveyed in grantees' APRs, are disseminated in the Department's Annual Program Performance Plan. This more detailed reporting has been made possible due to improvements in accuracy resulting from incorporating the standard objectives into the report form.

- 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.**

This report form and the website 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.**

There are no exceptions to the certification statement.