

## **SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION**

### **A. Justification**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section<sup>1</sup>. 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, make note of the sections or changed sections, if applicable.**

Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP), created in the Higher Education Amendments of 1998 (Title IV, Section 404A-404H), is designed to raise educational expectations and strengthen preparation for college for low-income middle grade and secondary school students through competitively awarded grants to state projects and local partnerships. Grantees (states and local partnerships) provide services including tutoring, mentoring, academic enrichment, student and family support, dissemination of information to students and their parents about postsecondary education and options for financing college, and financial assistance.

The regulations governing the Gaining Early Awareness and Readiness for Undergraduate Programs are 34 CFR Part 694. The Education Department General Administrative Regulations (EDGAR) requires grantees to submit a final performance report - see 34 CFR Part 74.71 and 34 CFR 80.50 (<http://www2.ed.gov/programs/gearup/legislation.html>).

This Financial Status and Program Performance Final Report is prepared and submitted by GEAR UP grant recipients within 90 days from the end of their 6 or 7-year grant performance periods. The information collected in the Final Report allows the Department of Education (ED) to determine if a GEAR UP grant project is ready to be closed in “good standing” or needs to remain open for further departmental post award action. Each grantee’s Final Report must communicate or substantiate that the goals of the GEAR UP grant program were achieved. This report is a means for grantees to share the overall experience of their projects and document the achievements and concerns, and describe the effect of their projects on participants being served; project barriers/”lessons learned” and successes/major accomplishments; and evidence of sustainability.

The Final Report is used by the Department to determine whether recipients of discretionary grants have made substantial progress towards meeting the objective of their respective projects, as outlined in their grant applications and/or subsequent work plans. In addition, the final report enables the Department of Education to evaluate each grant project’s fiscal operations for the entire grant performance period, and compare total expenditures relative to federal funds

<sup>1</sup> Please limit pasted text to no longer than 3 paragraphs.

awarded, and actual cost-share/matching relative to the total amount in the approved grant application.

Furthermore, the GEAR UP Final Report is used to collect data addressing the performance of the program on a national level and thereby includes the information for the Department to use when reporting the program implementation, student outcomes, and other required data on the GEAR UP GPRA (Government Performance and Results Act of 1993) performance indicators.

According to 34 CFR Part 694, there is a small increase in burden because the Final Performance Report now requires grantees awarded in 2011 who requested 7 years of GEAR UP funding to report on 7 years instead of 6 years of award activity. The 7th year reporting will describe funds spent to follow GEAR UP students into the first year of postsecondary education while also reporting on the students to be served who are also still enrolled in a GEAR UP high school. However, there is a decrease in the overall hours and costs because GEAR UP will have fewer grantees respond to the Final Performance Report Request.

The current Financial Status and Program Performance Final Report for the GEAR UP Program (OMB No. 1840-0782) will expire on June 30, 2014. This submission requests that the revised report be approved for use for an additional three years.

**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 Final Report is completed by each GEAR UP grantee within 90 days after his/her 6 or 7-year grant performance period terminates. The Department will use the data collection to ensure compliance with the performance goals and program requirements of GEAR UP.

**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. Also describe any consideration given to using technology to reduce burden.**

The Final Report has been converted to a computer-based application. The data collection can now be submitted, signed, filed, completed and conducted electronically through a website developed for ED by Computer Business Methods, Inc., at the following address:  
[https://opeweb.ed.gov/gearupfpr/codes/guf\\_login.cfm](https://opeweb.ed.gov/gearupfpr/codes/guf_login.cfm).

Grantees access the report by entering their unique ID and password. They can save their report by sections and submit the report to ED once completed. There are also edit checks on the number of students served and automatic totaling of budget information to avoid typographical and computational errors. These changes prevent submission of incomplete and erroneous reports.

**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.**

GEAR UP's Final Report is the primary method to collect the overall programmatic and fiscal information from the entire performance period of a project grant, and thereby serves as a GEAR UP grantee's culminating report. The Final Report collects data on the total federal expenditures and in-kind and matching contributions for each individual year of the project grant. The report serves as the recipients' means to communicate the overall accomplishments of their projects to determine the impact on the beneficiaries (primarily students), and to display clear evidence of making substantial progress toward achieving the program goals and meeting their proposed project objectives. Furthermore, the Final Report is GEAR UP's primary method to collect and analyze data on the high school graduation and immediate postsecondary education enrollment rates of the students served by the GEAR UP program.

Since the information submitted is specific to the GEAR UP program, there is no duplication. There is no other data collection instrument available that is critical to meet the purposes described in Items 1 and 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.**

We continue to anticipate that no small entities will be required to complete this final performance report. The collection of this information has no impact on 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.**

In accordance with EDGAR, 34 CFR §74.71 (institutions of higher education) and §80.50 (state and local governments), and other ED Discretionary Grants policies, a final program performance and financial status report must be submitted by each recipient within 90 calendar days after the date of completion of the grant's performance period, which is 6 or 7 years for GEAR UP state and partnership grants.

The data collection from this Final Report is obtained only during this post-award liquidation period of project grants, during the initial 90-day period after their federal funding from GEAR UP has terminated (i.e., after the performance period end date).

The Department of Education cannot close out a grant award unless it determines that all of the required work of the grant has been completed. The final program performance and financial status report serves to provide such evidence, and convey the extent to which a grant recipient (a) achieved the overall goals of the GEAR UP grant program; (b) implemented the proposed (as indicated in the approved proposal or subsequent work plan) services/activities, met the project's supporting objectives, and reported information that demonstrates successful achievement of expected grant project outcomes; and (c) with respect to fiscal operations, expended all of the federal funds obligated, and contributed the proposed in-kind and financial resources (cost-share/matching) over the life of the grant.

It is critical for GEAR UP grantees to submit their Final Reports in a timely manner so that the Department can determine if a grant project is ready to be closed in "good standing" or needs to remain open for further departmental post award action. If the grant recipient's report has not been received or the information in the report does not demonstrate successful achievement of expected outcomes, an ED staff person must follow up with the particular recipient. It must be determined in the follow-up if an oversight occurred, or if the recipient did not meet the grant project's proposed objectives, and/or if the recipient complied with the GEAR UP program requirements and reporting responsibilities (once a grant project ends).

If the recipient doesn't respond to the ED staff person's follow up efforts by submitting a final report that reflects compliance with the applicable Department regulations and all other terms and conditions of the grant award, and/or making substantial progress in achieving the overall program goals and project objectives, then the ED official must issue a noncompliance letter to the grant recipient.

**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 associated with this data collection. This information collection will be conducted in a manner consistent with established guidelines.

**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. 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 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.**

We will publish the appropriate 60 and 30 day Federal Register Notices to allow for public comment.

**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 are provided to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.<sup>2</sup> 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.**

Final Report data will not be confidential. The report does not collect data in which individual students can be identified.

**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.**

The questions are not of a sensitive nature.

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

- **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, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. 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.**

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<sup>2</sup> 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)

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**
  
- **Provide estimates of annualized cost to respondents of 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 in Item 14.**

<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Hours of Burden</b>	<b>Total Burden Hours</b>
125	One time	45	5625

<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Hours of Burden</b>	<b>Total Burden Hours</b>	<b>Wage Rate</b>	<b>Total Cost</b>
125	One time	45	5625	\$30/hour	\$168,750

**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 : \$ .00**

**Total Annual Costs (O&M) : .00**

**Total Annualized Costs Requested : \$ .00**

The only costs would be for 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.**

<b>Activities/Task</b>	<b>Cost</b>	<b>Hours</b>	<b>Number of Reports</b>	<b>Total Cost to Fed. Govt.</b>
Final Report Revisions/Form Design once every 3 years	\$45/hr	40		\$1,800
Securing OMB approval once every 3 years	\$45/hr	40		\$1,800
GEAR UP staff reviewing Final Reports	\$45/hr	4 hrs/FPR	125	\$22,500
Technical assistance to grantees (pre and post Final Report)	\$45/hr	4 hrs/FPR	125	\$22,500
GEAR UP staff processing Final Reports in G5	\$45/hr	30 hours		\$1,350
Preparing and Issuing Notifications of Final Closeout to grantees and certifying/ authorizing representatives	\$45/hr	20 hours		\$900
<b>Totals</b>				<b>\$50,850</b>

**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).**

According to 34 CFR Part 694, there is a small increase in burden because the Final Performance Report now requires grantees awarded in 2011 who requested 7 years of GEAR UP funding to report on 7 years instead of 6 years of award activity. The 7th year reporting will describe funds spent to follow GEAR UP students into the first year of postsecondary education while also reporting on the students to be served who are also still enrolled in a GEAR UP high school.

However, there is a decrease in the overall hours and costs from the previous OMB clearance because the number of respondents decreased by 84. The current burden hour estimate is based on 125 respondents.

**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 U.S. Department of Education does not plan to publish any information from this collection.

**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 U.S. Department of Education will display the expiration date for the OMB approval for this data collection.

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

No exceptions are being requested for this information collection.