## PAPERWORK REDUCTION ACT

## CHANGE WORKSHEET

| Agency/Subagency  |  | OMB Control Number |
|---|--|--------------------|
| US Department of Education, OSERS   |  | 1820-0572          |
|   | Enter only items that change<br>Current Record | New Record         |
| Agency form number(s)   | NA   | NA                 |
| Annual reporting and record keeping hour burden                           |  |                    |
| Number of respondents   | 190,456  |                    |
| Total annual responses  | 190,456  |                    |
| Percent of these responses collected electronically                       | 100%   | 0%                 |
| Total annual hours  | 26,796   |                    |
| Difference  |  | NA                 |
| Explanation of difference   |  |                    |
| Program Change  |  | NA                 |
| Adjustment  |  | NA                 |
| Annual reporting and record keeping cost burden (in thousands of dollars) |  |                    |
| Total annualized capital/startup costs                                    | NA   | NA                 |
| Total annual costs (O&M)  | NA NA  | NA                 |
| Total annualized cost requested   | NA   | NA                 |
| Difference  |  | NA                 |
| Explanation of difference   |  |                    |
| Program Change  |  | NA                 |
| Adjustment  |  | NA                 |

| Other change* | Other | chan | ıae** |
|---------------|-------|------|-------|
|---------------|-------|------|-------|

As a result of complications with the Federal Information Security Management Act (FISMA) system requirements, Certification and Accreditation (C&A) requirements, and the data collection and data migration under the AT Act of 1998, as amended in 2004 public law 108-364, to the MIS data system, the program office (OSERS) will need to accept paper submission from grantees instead of electronic submission for this reporting period only.

Burden was reduced by the use of the electronic system originally proposed in the clearance of 1820-0572 because the system (a) performed calculations for the grantees and (b) allowed RSA to download the reports itself rather than states submitting hard copies. Due to difficulty with FISMA, this electronic system that already is designed and operational cannot be used to directly enter data and submit it to RSA because RSA cannot store the data. RSA has provided the following alternatives to states: (1) States can use the electronic system that already is designed and operational to enter their data just as they would have previously. The system will perform calculations as stated, but RSA will not download the reports itself nor will the data be stored for RSA's purposes. Instead, grantees will be asked to convert the reports into a word document or PDF and e-mail it to RSA. This functionality is built into the system already and is a negligible difference in time (mere seconds); (2) RSA also provided states with spreadsheets into which states can enter data to have the calculations done for them and the data from these can then be transmitted electronically to RSA by e-mail as Word documents. For both scenarios (1) and (2), the burden of entering the data is unchanged, the burden of calculation is unchanged (it is done either by the electronic system or the spreadsheet); and the difference between an automatic download of the data and the e-mailing of a word document or PDF is negligible.

| Signature of Senior Officer or designee: | Date: | For OIRA Use |
|--|-------|--------------|
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**OMB 83-C** 

<sup>\*\*</sup>This form cannot be used to extend an expiration date