

Introduction and Overview

The purpose of this data collection is to fulfill requirements of two statutes, i.e., the amendments to the Individuals with Disabilities Education Act of 2004 (IDEA) and the Government Performance and Results Act (GPRA) of 1993.

IDEA seeks to improve outcomes for infants, children, and youth with disabilities and requires states to employ highly qualified teachers in the field of special education. The Office of Special Education Programs' (OSEP) Personnel Development Program to Improve Services and Results for Children with Disabilities (Personnel Development Program) provides grants to institutions of higher education (IHEs) to train personnel in the area of special education with the intent of increasing the number of special educators. The program was established in the 1970s, and due to the increasing number of scholars going into career fields outside of special education, after completing university special education programs, a service obligation was added in the amendments to IDEA 1997. IDEA 2004 shifted the burden of collection and verification of service obligation information from IHEs to the U.S. Department of Education (ED). The regulations published on July 5, 2006 are attached.

GPRA requires Federal agencies to provide for the establishment of performance measurement of all programs. OSEP has established performance measures for the Personnel Development Program, and data collection from scholars who have received scholarships under the Personnel Development Program is necessary to evaluate these performance measures.

In September 2007, ED contracted with Optimal Solutions Group LLC to establish the National Center on Service Obligations (NCSO) to collect, track, and verify information pertaining to scholars' service obligations, beginning with grant awards made in fiscal year (FY) 2005 and to collect data required to evaluate Personnel Development Program performance measures.

Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education was issued on October 19, 2007. All Chapter 2 grantees will be in full compliance with this guidance by 2011.

A. Justification

A.1 Circumstances Necessitating Data Collection

The need for data collection stems from the service obligation requirement of the Personnel Development Program that can be found in IDEA 2004 Section 662 which states that:

- (1) Each application for assistance...shall include an assurance that the eligible entity will ensure that scholars who receive a scholarship under the proposed project

agree to subsequently provide special education and related services to children with disabilities, or in the case of leadership personnel to subsequently work in the appropriate field, for a period of 2 years for every year which the scholarship was received or repay all or part of the amount of the scholarship, in accordance with regulations issued by the Secretary.

- (3) Secretary's responsibility.—The Secretary—(A) shall ensure that individuals described in paragraph (1) comply with the requirements of the paragraph.

If a scholar does not fulfill the service obligation in the period of time specified in the June 5, 2006, regulations, the scholar is referred to ED's Office of Debt Management (DM) for repayment of the scholarship. ED is responsible for collecting the necessary information, verifying the completion of the service obligation, and referring scholars to DM for repayment, if necessary. See Attachment A for the complete service obligation regulations.

In addition, performance measure data will be collected for the following two approved measures:

Measure 2.4 of 5: The percentage of Special Education Personnel Preparation funded degree/certification recipients who are working in the area(s) for which they were trained upon program completion and who are fully qualified under IDEA.

And

Measure 2.5 of 5: The percentage of degree/certification recipients who maintain employment for 3 or more years in the area(s) for which they were trained and who are fully qualified under IDEA and meet additional state requirements that may exist.

A.2 Purposes and Uses of the Data

The data will be used to verify the fulfillment of the service obligation and to identify scholars who are not fulfilling their requirement for referral to DM for repayment of scholarships. The data will be collected by Optimal Solutions Group under the auspices of the National Center on Service Obligations (NCSO) and will be used to report to ED and DM.

IHEs that received program grants will be asked for data pertaining to scholars' identity and contact information. Employment information will be collected from scholars to verify the progress and completion of their service obligation. Other data from scholars concerning job satisfaction, areas of training, and related service area will be collected to assist in evaluating program performance measures. For example, the program seeks to increase the number of scholars working in the special education area for which they were trained. Achieving this goal requires collecting information about field of training and field of service. Employers will be asked to verify employment information obtained from the scholar concerning the scholar's obligation.

A.3 Use of Technology to Reduce Burden

Optimal will use automated and electronic technology when possible and appropriate to reduce the cost and burden of information collection. IHEs, scholars, and employers will receive automated e-mails and phone calls prompting them to log in to a secure online database. The data collection instruments will be available online to stakeholders. If respondents are unable to provide this information online, Optimal will employ less automated data collection techniques; it is expected that only a small portion of the respondents will not be able to provide requested information online or on the telephone. The Optimal team will also develop an informative Web site through which the database can be easily accessed and information about the Personnel Preparation Program, program regulations, and the service obligation component can be found. The basis for the use of these technologies is to minimize burden, improve implementation efficiency, and simplify respondent compliance.

A.4 Efforts to Identify Duplication

The establishment of NCSO will enable ED to switch the burden of verification of scholars' service obligation from the IHEs to NCSO. The IHEs were not collecting information in a centralized or uniform fashion. Centralized information collection through the NCSO is necessary for standardization of the program and implementation. Some of this information on scholars who are currently fulfilling their service obligation may have been collected recently by IHEs, but will have to be collected again through NCSO's data system. Every effort will be made to obtain all available data from IHEs and require only scholar verification. The extent of duplication is expected to be negligible.

A.5 Burden on Small Businesses

While the majority of respondents are IHEs and individual scholars, some employers may be classified as small businesses. The burden will be minimal for employers. Employers will be asked to verify their contact information and the information provided by the scholar. This will be required once a year, and it is unlikely that many scholars are employed by small businesses because most of the scholars are employed by public school districts. Therefore, any burden imposed upon small businesses will be negligible.

A.6 Consequences on Federal Program or Policy Activities if the Collection of Information is not Conducted or is Conducted Less Frequently

The service obligation regulations require the collection of data to ensure that scholars are complying with the statutory requirements, and GPRA statute requires data collection to evaluate the program's performance.

A.7 Special Circumstances

Scholarship recipients may be required to maintain their employment records to certify their service obligation for more than three years.

A.8 Form 5 CFR 1320.8(d) and Consultation Prior to OMB Submission

Comments were solicited through the NPRM; however, no public comments were received.

A.9 Justification for Respondents' Payments

No payments or gifts will be provided to respondents other than normal remuneration to grantees.

A.10 Confidentiality

No assurance of confidentiality is provided to respondents. The Optimal team will protect the confidentiality of all information collected for this project and will use it only for purposes within the scope of the contract with ED. All key personnel have either obtained or have submitted required materials for security clearance. Any information in paper form will be protected under lock and key at all times. Any information stored electronically will be stored in a database that is certified and accredited under the process for systems not on EDNet.

A.11 Questions of a Sensitive Nature

No questions of a sensitive nature will be asked.

A.12 Estimates of the Hour Burden of Data Collection on Respondents

Three different entities—the IHEs, employers, and scholars themselves—will be asked to report or verify information about the scholar. The approximate time required to complete the IHE Questionnaire form and the Employer Verification form will not vary widely; however, the time taken by the scholar to complete the Scholar Training and Employment Information report will vary based on employment history, military service, and volunteer activities. For example, the completion time for a scholar with a deferral or exception is approximately 5 minutes. The completion time for the IHE Questionnaire and the Employment Verification form are low because most of the information in these reports are pre-populated and require only verification.

In addition to entering data in the database, IHEs and scholars will also complete Scholarship Agreements prior to the award of a scholarship and Exit Certifications when a scholar completes or leaves the program. The IHEs often meet with scholars in groups to explain the Scholarship Agreement. Meetings are estimated to take 60 minutes for scholars and IHEs. How often IHEs complete Agreements in groups or how large the groups are is not known; therefore, the burden for IHEs is estimated based on 80 IHEs meeting with groups of 5 scholars.

When each scholar exits the program, the IHE will provide the scholar with an Exit Certification, including scholar contact information, social security number, the amount of the scholarship and length of the service obligation, for scholars to verify, sign and return. It is estimated that this will take each scholar and IHE 30 minutes.

The Agreement and Exit Certification occur only once each during the scholars' program. Programs can last from less than one year to four years, making the burden extremely difficult to calculate with accuracy.

Employers have minimal recordkeeping burden related to this data collection. It is estimated that it will take employers 10 minutes to review the instructions and gather information required.

Tables A.12 (a) and 12 (b) below provide estimated annual reporting and recordkeeping burdens for IHEs, scholars and employers.

Table A. 12(a) Estimated Annual Reporting Burden

Instruments For Scholars and IHE staff	Number of Scholars	Average Completion Time in Minutes	Frequency During Scholars' Program	Frequency Per Year	Estimated Burden In Minutes	Estimated Annual Hour Burden
IHE Burden						
IHE Questionnaire	3,750	4	--	1	15,000	250
Estimated Annual IHE Reporting Burden						250
Scholar Burden						
Scholar Training & Employment Form	3,750	8	--	2	16	1,000
Estimated Annual Scholar Reporting Burden						1,000
Employer Burden						
Employer Verification Form	3,750	5	--	1	18,750	313
Estimated Annual Employer Reporting Burden						313
TOTAL Estimated Annual Burden						1,563

Table A. 12 (b) Estimated Annual Recordkeeping Burden

Documents for Scholars and IHE staff	Number of Scholars	Average Completion Time in Minutes	Frequency During Scholars' Program	Frequency Per Year	Estimated Annual Burden in Minutes	Estimated Annual Burden in Hours
IHE Burden						
IHE Agreement with Scholar (IHEs develop their own agreements)	750 (estimate based on IHEs completing document with groups of 5 scholars)	60	1 (Scholar programs range from 1 – 4 years)	--	45,000	750
IHE Exit Agreement with Scholar	3,750	30	1	--	112,500	1,875
Estimated Annual Burden for IHEs						2,625
Scholar Burden						
IHE Agreement with Scholar	3,750	60	1 1/3 per year	--	75,000	1,250
IHE Exit Agreement with Scholar	3,750	30	1 1/3 per year	--	37,500	625
Estimated Annual Burden for All Scholars During Their Program						1,875

Table A. 12 (b) Estimated Annual Recordkeeping Burden (Continued)

Employer Burden						
Employers' Review of Instructions and Gathering Data	3,750	10	--	1 time per year upon employment of a scholar	37,500	625
Estimated Annual Burden for All Employees						625
Estimated Total Recordkeeping Burden (IHEs, Scholars & Employers)						5125
TOTAL ESTIMATED ANNUAL RECORDKEEPING AND REPORTING BURDEN FOR IHEs, SCHOLARS, AND EMPLOYERS						6,688

A.13 Estimate of Total Annual Cost Burden to Respondents

There are no costs other than the burden identified in Q 12.

A.14 Estimate of Annualized Cost to the Federal Government

The average cost for the next three years for the contact with NCSO, under the terms of ED's contract with Optimal, is \$423,944.

A.15 Changes in Burden

This is a new collection; therefore, there is no change in burden.

A.16 Tabulation, Analysis, and Publication Plan and Schedule

The information collected will not be published.

A.17 Reasons Not to Include OMB Expiration Data

Data collection instruments will include the OMB expiration date.

A.18 Exceptions to Certification Statements

The information collection will not need an exception to the certification statement in OMB Form 83-1.