

**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 copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This information collection is required under regulations governing the Teacher Quality Enhancement Grants Program (TQE), as authorized by the Higher Education Act (HEA) of 1965, as amended in 1998.

The U.S. Department of Education (ED) is requesting a revision of a currently approved collection, in order to continue implementation of the requirement that students in teacher preparation programs who receive scholarships under TQE must repay those scholarships, if they do not teach in high-need local educational agencies (LEAs) for the same period as that for which they received financial assistance. This requirement is found in section 204(e) of the HEA, as amended, Public Law 105-244. A copy of the statute is attached.

In addition, the regulations governing TQE include the following specific provisions requiring the collection of this information:

- Section 611.41 describes the circumstances under which an individual may receive a scholarship to attend a teacher training program and spells out the terms and conditions that will be binding on the recipient.
- Section 611.42 describes how the period of service for the scholarship recipient will be determined and the information that ED will need from the institution of higher education (IHE) that awards the scholarship and from the high-need LEA where the scholarship recipient ultimately teaches.
- Section 611.43 describes the consequences of a scholarship recipient's failure to meet the service obligation.
- Section 611.44 describes the circumstances under which the Secretary may defer a scholarship recipient's service requirement and the process for obtaining renewal of the deferment.
- Section 611.45 describes the circumstances under which the Secretary may discharge a scholarship recipient's obligation to repay a scholarship.

- Section 611.46 describes the scholarship recipient’s reporting responsibilities with regard to his/her employment with a high-need LEA or request for a deferral.
- Section 611.47 describes a scholarship recipient’s reporting responsibilities upon the close of the LEA’s academic year.
- Section 611.48 describes the scholarship recipient’s reporting responsibilities upon failure to graduate or withdrawal of scholarship support.
- Section 611.49 describes the grantee’s responsibilities for implementing the scholarship requirements before awarding a scholarship. These responsibilities include insuring recipients understand and execute the terms and conditions of ED’s approved scholarship agreement.
- Section 611.50 describes the grantee’s responsibilities in helping to implement the scholarship requirements. These responsibilities include providing specific information to ED concerning the recipients when they are first accepted in the program and providing information to ED concerning any recipient’s graduation or withdrawal from the program.

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.

TQE records will be administered by ED’s Office of Postsecondary Education (OPE) and will be maintained in compliance with the System of Records notice published in the *Federal Register* on October 19, 2000. These record-keeping requirements are necessary to ensure that scholarship recipients understand and abide by the legal requirement to teach in high-need schools in high-need LEAs as a condition of their scholarships, and to permit ED to institute collection procedures against those who fail to abide by their contractual obligations.

Specifically, the purposes of the information collection are to: 1) identify the recipients of financial assistance provided by TQE; 2) subsequently track the employment history of these individuals to ensure that they are in compliance with program requirements; 3) enable recipients—as appropriate—to request deferments of their service obligation or a repayment schedule, if they become obligated to repay their scholarships; and 4) track scholarship recipients who default on their obligation and to pursue collection of funds from these individuals.

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 of using information technology to reduce burden.

OPE has worked with ED's Office of the Chief Information Officer (OCIO) for the development of an electronic system that will support the collection of TQE scholarship monies from individuals whose scholarships convert to loans when they choose not to teach in a high-need area after graduation and certification.

Since TQE scholarship funds are awarded to students by an outside entity (i.e., an institution of higher education, a state, or a school district), it is the outside entity that executes the contract with the individual student and is responsible for the basic record-keeping requirements of the program. Thus, ED has developed an Internet based, e-authorization certified website that will allow these TQE Grants Program Scholarship forms (Scholarship Terms and Conditions and Scholarship Terms and Conditions Addendum) to be electronically submitted. This Internet-based website will escalate efficiently and will reduce a substantial paper burden of inputting these documents manually. ED is currently going through the final stages of internal approval of this revision, which includes four TRB (Technical Review Board) approvals. We have just completed the Planning and Requirements reviews and will proceed to the Design and Implementation TRB reviews. After all approvals have been met, we will implement the e-authorized website, which will go live, collecting and tracking all information electronically by spring of 2008.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

Because data collected are specific to recipients of TQE scholarship funds, there is no similar or duplicate collection occurring. The information and purposes described in Item 2 are distinctive to this program.

5. If the collection of information impacts small businesses or other small entities (Item 9 of IC Form Part II), describe any methods used to minimize burden.

The application does not involve the collection of information from small businesses or other small entities. Only institutions of higher education, high need state and local school districts (SEAs and LEAs), and non-profit organizations providing TQE scholarships, as well as postsecondary teacher education students receiving scholarship assistance under the TQE program are affected by this collection.

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.

The reporting and record-keeping requirements are the minimum required to implement the program statute and program regulations. To require that they be performed on a less frequent basis would reduce ED's ability to effectively administer the program in accordance with

statutory and regulatory provisions, and is apt to result in an inability to recover funds from scholarship recipients who fail to abide by the terms of their scholarships.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner.

There are no special circumstances related to this collection, because:

- Information would never have to be collected more than quarterly.
- Respondents would not be required to prepare written responses in less than 30 days.
- Submitting duplicate copies of documents would not be required.
- There is no requirement that respondents retain records for more than three years. The IHEs will submit records regarding the scholarship amounts awarded to individual students (using the forms that are the subject of this clearance request) to ED, where that information will be tracked and retained.
- Statistical surveys are not applicable with these regulatory provisions.
- No statistical data classification will be used.
- Consistent with requirements of the Privacy Act, ED will maintain all personally identifiable information that is received on the basis of these information collections through a "system of records" that was announced by notice in the *Federal Register*, and that permits release without consent of personally identifiable information only for "routine use" or as otherwise permitted by law.
- No circumstances exist that would require respondents to submit proprietary trade secrets.

8. 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.

A *Federal Register* notice allowing respondents to comment on the previous information collection was published on May 1, 2006 on page 25574, and subsequently on July 18, 2006 on page 40710 (30-day follow-up notice). No comments were received in response to these notices.

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.

Representatives outside ED were consulted with regard to the documents in the most recent collection in 2006. No comments were received -- no significant problems were identified, and the original estimates of record-keeping burden were seen as generally accurate.

In addition, feedback is consistently solicited from both grantees and scholarship recipients, such as during a] special sessions at grantee meetings (such as the December 2006 TQE project directors meeting, and the October 2007 TQE meeting for FY 2007 TQE-Recruitment grantees); b] TQE meetings targeted to grantees administering scholarships (e.g., such as the March 21, 2007 meeting that focused exclusively on scholarship regulations, policies, practices, and documents); c] specialized meetings (such as the Sept. 28, 2005 teleconference-workshop for FY 2005 grantees administering TQE-funded scholarships) and more general technical assistance conference calls; and d] during on-site monitoring visits. No significant problems have been identified, and the original estimates of record-keeping burden have been seen as generally accurate. RIMS will also solicit comments on this package in the *Federal Register*.

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

The legislation provides for the awarding of scholarships to prospective teachers who agree to teach in high-need LEAs, as defined by statute and in the TQE regulations at 611.1.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

In order to implement the requirements of the statute, confidential information on scholarship recipients will be collected. Specifically, the IHE will report to ED the name, address, social security number, and date of birth for each recipient at the time a scholarship award is made. These data will be used to track students after the completion of their studies (or withdrawal from the program) to ascertain whether they are fulfilling the teaching requirement of their award.

Any data that is required and maintained by ED itself will be maintained in accordance with the Privacy Act of 1974, as amended. To assure that sensitive data about scholarship recipients are not compromised, all data—whether submitted electronically or as hard copy—will be

maintained in a secure location. Access to these data will be limited only to staff who are directly responsible for working with TQE and this information is only available onsite at the TQE office via desktop computer.

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.

Some records may ultimately include information about family income, employment history, medical certificates verifying a disability, or other personal information necessary to document a scholarship recipient's eligibility for a deferment under the program. Only information required by statute or defined by regulations, and necessary for the implementation of the "teach or pay" provision will be collected.

12. Provide estimates of the hour burden of the collection of information and estimated costs to respondents.

Respondents/record keepers under this provision include: 1) IHEs that provide scholarships; 2) teacher education students who receive scholarship assistance under the program; and 3) high-need LEAs that employ scholarship recipients. The estimated annual record-keeping and reporting burden extends to these three groups. The TQE program is currently being considered for continued authorization under the reauthorization of the HEA. Regardless of whether additional TQE grants are awarded, the scholarship forms will continue to be required by the current TQE grantees, as well as current and future scholarship recipients and their employing LEAs.

Burden Hours to IHEs

It is anticipated that approximately 50 IHEs will be awarding scholarships to approximately 2,400 prospective teachers in their efforts to improve teacher recruitment in high-need LEAs. They will be responsible for informing students about the requirements of the "teach or pay" provision, obtaining their signatures on a contractual agreement or an addendum, and subsequently providing information to ED concerning the recipients on a semi-annual basis. It is estimated that it will take approximately 20 minutes to inform each student about the provisions and to obtain a signature. It is anticipated that it will take an additional one-half hour (30 minutes) to transmit the required information to ED.

Burden for IHEs is estimated as follows:

$$2,400 \text{ students} \times 1/3 \text{ hour} = 800 \text{ hours}$$

$$50 \text{ postsecondary institutions} \times 30 \text{ minutes annually} = 25 \text{ hours}$$

Total Annual IHE Burden Hours: 825

Burden Hours to Scholarship Recipients

When scholarship recipients receive their awards, they are required to read and sign an initial contract or an addendum to an earlier contract agreeing to the “teach or pay” provision of the program. It is estimated that it will take the student approximately 20 minutes to fulfill this requirement. When they have completed their teacher training, they have six months in which to obtain employment with a high-need LEA. When they have done so, they are required to notify ED of their employment and have an LEA official certify annually that they are employed in a high-need school in a high-need LEA. Subsequently, the LEA must certify annually that the recipient has fulfilled the teaching obligation at the end of the school year. It is estimated that it will take the recipient approximately 30 minutes per year to fulfill this requirement. Recipients who require a deferment or who wish to repay the cost of the scholarship (estimated at 10 percent of all recipients or 240 teacher education graduates) will need to contact ED either to document their need for a deferral or to request a repayment schedule. This is estimated to take one hour.

Burden for scholarship recipients is estimated as follows:

2,400 recipients x 1/3 hour = 800 hours (scholarship contracts/addenda)

1,200 recipients x 1/2 hour = 600 hours (teaching verification form)

240 recipients x 1 hour = 240 hours (deferment or repayment requests)

Total Annual Scholarship Recipient Burden Hours: 1,640

Burden Hours to LEAs

LEAs are required to certify annually that the scholarship recipient is currently employed in a high-need school and to subsequently confirm that the teacher remained employed for the expected period of time. For this purpose, the scholarship recipient will provide the Teaching Verification form to the LEA for the signature of a certifying official. This is a two-part document, which has been designed to minimize the reporting burden on the LEA. It is estimated that it will take the LEA approximately 30 minutes (15 minutes to verify hiring and 15 minutes to verify continued employment) to meet this requirement.

Burden for LEAs is estimated as follows:

1,200 recipients x 1/2 hour = 600 hours

These procedures and their resulting burden have been tailored to be as similar as possible to those successfully used by ED for the Perkins Loan Program and for other student assistance programs.

Total Annual LEA Burden Hours: 600

Total Annual Number of Burden Hours: 3,065
(825 IHE hrs. + 1640 Scholarship Recipient hrs. + 600 LEA hrs.)

Total Annual Number of Respondents: 2,850
(50 IHEs + 2400 Scholarship Recipients + 400 LEAs)

The total number of respondents remains unchanged from the number provided in FY 2007, given that there has been no significant shift in the number of grantees awarding scholarships.

The annual cost burden to respondents or record-keepers is estimated as follows:

Cost Burden to IHEs

Number of IHEs affected	50
Estimated number of students receiving scholarships	2,400
Average number of students per IHE (2,400 / 50)	48
Average time to inform students about scholarship repayment issues	20 minutes
Total average hour burden per IHE to inform students (20 minutes X 48 students /60 minutes)	16 hours
Total burden hours to inform students about scholarship requirements (50 x 16 hours)	800 hours
Average time to transmit information to ED about scholarship recipients	30 minutes
Total burden hours to transmit info to ED (50 institutions x 30 minutes)	25 hours
Total average time per IHE to perform all requirements related to scholarship recipients (16 hours + 30 minutes)	16.5 hours
Total burden hours (50 institutions x 16.5 hours)	825 hours
Average salary per hour of IHE employees	\$42

Total cost per IHE (16.5 hours x \$42)	\$693
<u>Total Annual Cost Burden to IHEs</u> (\$693 x 50 IHEs)	\$34,650
Cost Burden to Scholarship Recipients (There is no monetary cost to scholarship recipients)	\$0
Cost Burden to LEAs	
Number of LEAs affected (Note: It is expected that many students will be concentrated in the high-need LEAs cited in grant partnerships, since those LEAs will actively recruit scholarship recipients.)	400
Estimated number of scholarship recipients who will require certification of employment	1,200
Average number of scholarship recipients per LEA (1,200/400)	3
Average time to process and mail certification form	30 minutes
Total average burden per LEA (30 minutes x 3 teachers = 90 minutes/60)	1.5 hours
Total burden hours to process certification forms (400 LEAs x 1.5 hours)	600 hours
Average salary per hour of LEA employees	\$37
Total cost per LEA (\$37 x 1.5 hours)	\$55.50
<u>Total Annual Cost Burden to LEAs</u> (400 LEAs x \$55.50)	\$22,200

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.)

No other expenses are incurred other than those included in Item 12.

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 Annual Cost to the Federal Government is estimated as follows:

Professional staff to develop, package, and prepare clearance package (GS-13 employee) 40 hours x \$46.92 per hour	\$1,877
Professional staff to administer the record-keeping and secure information provided by grantee (GS-12 employee 50%; GS-13 employee 75%)	
\$82,349 per year x 50%	\$41,175
\$97,926 per year x 75%	\$73,445
Salaries Total Cost:	\$116,497
Overhead costs related to facilities, administration and other indirect costs plus accrual of leave and fringe benefits; estimated at 50% of salaries	
\$116,498 x 50%	\$58,249
Web Development --Professional Contract for planning, determining requirements, designing, and implementing a website for the electronic processing of TQE scholarship applications/contracts, addenda, and verification of teaching obligation forms, and more efficient administration and tracking of the TQE scholarship program recipients.	
	\$85,235
<u>Total Annual Cost Burden to Federal Government</u>	\$174,746 + \$85,235 = \$259,981

15. Explain the reasons for any program changes or adjustments reported in Item 16 if IC Data 1.

This information collection requests a program change that results from a reduction in burden, from 3,090 total annual burden hours to 3,065 hours (and corresponding change in annual cost burden to IHEs), from \$35,700 to \$34,650. The reduction in burden hours is due to changes to the method in which information (in the Scholarship Contracts and Scholarship Addenda) is

transmitted to ED from colleges and universities, from mailed paper documents to a web-based method.

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 results of the information collection will not be published.

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.

ED is not seeking this approval.

18. Explain each exception to the Certification statement from the “Certification for Paperwork Reduction Act Submissions.”

ED is not requesting any exceptions to the “Certification for Paperwork Reduction Act Submissions” .

B. Collection of Information Employing Statistical Methods

Not applicable to this collection.