

Supporting Statement

Information Collection for the Documents Associated with the Notice of Terms and Conditions of Purchase of Loans under the “Ensuring Continued Access to Student Loans Act of 2008”

A. Justification

1. Necessity of Information Collection

The Ensuring Continued Access to Student Loans Act of 2008 (Pub. L. No. 110-227) (the ECASLA), which was signed into law on May 7, 2008, amended the Higher Education Act of 1965, as amended (the HEA) by adding a new Section 459A that provides the U.S. Department of Education (the Department) with temporary authority to purchase student loans from Federal Family Education Loan (FFEL) Program lenders. This is one of several authorities that the ECASLA provided to the Department in order to address concerns about the availability of student loans under the FFEL Program.

Section 459A of the HEA provides that the Secretary of Education, the Secretary of the Treasury, and the Director of the Office of Management and Budget must jointly determine the terms and conditions of the loan purchase program. Public Law 110-350, signed into law on October 7, 2008 extends the timeframe for the Secretary’s student loan purchase authority to September 30, 2010.

The documents included with this submission explain the terms and conditions of the program and collect information from FFEL Program lenders related to their interest in participating in the loan purchase programs. Additionally, collection of information to specifically support a lender’s request that the Department purchase FFEL loans or participation interests in loan facilities is required. Such information includes details of the lender’s funding request and the loans that provide support for the request.

The web page <http://federalstudentaid.ed.gov/ffelp/> contains information on the Loan Purchase Programs as well as all forms and data formats for participation in the program.

2. Purpose and Use of Information Collected

The documents associated with this collection are as follows:

- 1. Notice of Intent to Participate** - Submitted to the Department’s Federal Student Aid office (ED/FSA) by FFEL lenders that wish to establish eligibility to participate in the loan purchase programs. The submission will be used by ED/FSA to establish the lender’s loan purchase eligibility date. The Notice of Intent to Participate is included as Exhibit H in the Master Participation Agreement and as Exhibit F in the Master Loan Sale Agreement. These agreements are described below.
- 2. Master Participation Agreement** – Submitted by FFEL lenders to ED/FSA to establish the legal relationships and contractual conditions of the lenders’ participation in the “Loan Participation Purchase Program”.
- 3. Master Loan Sale Agreement** - Submitted by FFEL lenders to ED/FSA to establish the legal relationships and contractual conditions of the lenders’ participation in the “Loan Purchase Commitment Program”.
- 4. Operational Documents** – Submitted by FFEL lenders to ED/FSA to request purchase of loans or interest in loans under the loan purchase programs and to provide loan level

documentation to support such requests. These documents are included as attachments to this Supporting Statement.

3. Consideration of Improved Information Technology

The information will be submitted as follows:

1. **Notice of Intent to Participate** - Submitted electronically as a PDF attachment to an email to ED/FSA by FFEL lenders that wish to establish eligibility to participate in the loan purchase programs. The Notice of Intent to Participate is included as Exhibit H in the Master Participation Agreement and as Exhibit F in the Master Loan Sale Agreement.
2. **Master Participation Agreement Adoption Forms** – Submitted in paper form by FFEL lenders and participation custodians that wish to execute a Master Participation Agreement with the Department. Since the Agreement creates a binding contract between multiple parties it must be executed with “pen and ink” signatures.
3. **Master Loan Sale Agreement Adoption Forms** - Submitted in paper form by FFEL lenders and participation custodians that wish to execute a Master Participation Agreement with the Department. Since the Agreement creates a binding contract between multiple parties it must be executed with “pen and ink” signatures.
4. **Operational Documents** – Submitted by FFEL lenders and participating custodians to ED/FSA. Requests for funds will be in paper format because of the need for “pen and ink” signatures. Supporting loan information will be submitted using secure electronic formats.

4. Efforts to Identify Duplication

There is no information available from other sources that could be used for the purposes described in Item 2.

5. Burden Minimization as Applied to Small Businesses

No small businesses are affected by this information collection.

6. Consequences of Less Frequent Data Collection

Without this collection of information, it would not be possible for the Department to administer the loan purchase programs described in Item 1.

7. Special Circumstances Governing Data Collection

With two exceptions, this information collection does not involve any of the conditions listed in 5 CFR 1320.5(d)(2). Respondents may be required to report information more than quarterly in order to document ongoing student loan activity related to the loan purchase program. In addition, record retention requirements may exceed three years in some cases based on FFEL Program regulatory requirements.

8. Consultations Outside the Agency

In developing the documents associated with this collection, the Department worked closely with the Department of the Treasury, the Office of Management and Budget, and FFEL Program lenders. The Department will also publish the appropriate Federal Register notices inviting public comment.

9. Payments or Gifts to Respondents

No payments or gifts will be provided to respondents.

10. Assurance of Confidentiality

Loan level data for the Master Loan Sale Agreement will be collected and held in the Federal Family Education Loan Servicing System that is included under the Common Services for Borrowers System of Record Notice, number 18-11-16. Loan level data for the Master Participation Agreement will be collected and held in the Financial Management System with the System of Record Notice, number 18-11-17.

11. Questions of a Sensitive Nature

The documents associated with this collection do not require respondents to provide any information that would be considered sensitive.

12. Annual Hour Burden for Respondents/Recordkeepers

The total estimated number of respondents for this information collection is 2,085. The total estimated annual reporting hour burden is 26,980 hours, calculated as follows:

1. **Notice of Intent to Participate** – [MPA Exhibit H, MLSA Exhibit F] Action Order 1 on chart below

Estimated Number of Respondents = 1,000 FFEL lenders. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 1,000. Notice of Intent only needs to be filed once for the duration of the program.

Burden Hours per Response = 1 hour. Includes time for lender review, internal consultation, form completion, and submittal.

Total Burden Hours = 1,000 hours.

2. **Master Participation Agreement Adoption Forms**– [MPA Exhibits A, E, F] – Action Order MPA 1 on chart below

Estimated Number of Respondents = 50 FFEL lenders. Only FFEL lenders that will place at least \$50 million can participate). These are a subset of the 1000 FFEL lenders.

Number of Responses = 50. The agreement only needs to be executed once for the duration of the program.

Burden Hours per Response = 20 hours. Includes time for lender review, including senior management and counsel, internal consultation, form completion, compiling attachments and submittal.

Total Burden Hours = 1,000 hours.

3. **Master Loan Sale Agreement Adoption Forms** – [MLSA Exhibits A, C, D] – Action Order MLSA 1 on chart below

Estimated Number of Respondents = 100 FFEL lenders. Expected number of FFEL lenders that will sell loans to the Department. Estimate based upon community input and

other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program. These are a subset of the 1000 FFEL lenders.

Number of Responses = 100. The agreement only needs to be executed once for the duration of the program.

Burden Hours per Response = 12 hours. Includes time for lender review, including senior management and counsel, internal consultation, form completion, and submittal.

Total Burden Hours = 1,200 hours.

4. **Master Loan Sale Agreement 2007-2008 Forms** – [MLSA Exhibits A, C, D] – Action Order 07-08 MLSA 1 on chart below

Estimated Number of Respondents = 50 FFEL lenders. Expected number of FFEL lenders that will sell loans to the Department. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 50. The agreement only needs to be executed once for the duration of the program.

Burden Hours per Response = 3 hours. Includes time for lender review, including senior management and counsel, internal consultation, form completion, and submittal.

Total Burden Hours = 150 hours.

5. **Operational Documents – Master Participation Agreement – Only those who have completed the Master Participation Agreement can complete any of the documents below.**

Rolling Monthly Forecast - Action Order MPA 2 on chart below

Estimated Number of Respondents = 50 FFEL lenders. Expected number of FFEL lenders who will sell participation interests to the Department. Estimate based upon minimum activity requirement (not less than \$50 million), community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 600. Monthly reporting requirement is one submission per month.

Burden Hours per Response = 1 hour. Assumes that, after initial start-up, the lender has developed an automated process for these reports that are submitted electronically.

Total Burden Hours = 600 hours.

Funding Request [MPA Exhibits B, C, D, G] – Action Order MPA 3a on chart below

Estimated Number of Respondents = 50 FFEL lenders. Expected number of FFEL lenders who will sell participation interests to the Department. Estimate based upon minimum activity requirement (not less than \$50 million), community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 1,250. Frequency depends upon lender need for funding, its business processes, and its internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 2 hours. Assumes that, after initial start-up, the lender has developed an automated process for these reports.

Total Burden Hours = 2,500 hours.

Loan Schedule and Custodial Certification Data File – Includes Personally Identifiable Information - Action Order MPA 3b on chart below

Estimated Number of Respondents = 50 FFEL lenders.

Number of Responses = 1,250. Frequency depends upon lender need for funding, its business processes, and its internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 2 hours. Assumes that, after initial start-up, the lender has developed an automated process for these reports that are submitted electronically.

Total Burden Hours = 2,500 hours.

Monthly Aggregate Settlement Date Report – Action Order MPA 4a on chart below

Estimated Number of Respondents = 50 FFEL lenders.

Number of Responses = 600. One submission for each month.

Burden Hours per Response = 1 hour. This report is a variation of the funding request schedules and the custodian will only need to make minor adjustments to the process that it uses for those reports. This report is submitted electronically.

Total Burden Hours = 600 hours.

Monthly Loan Schedule - Includes Personally Identifiable Information – Action Order MPA 4b on chart below

Estimated Number of Respondents = 50 FFEL lenders.

Number of Responses = 600. One submission for each month.

Burden Hours per Response = 2 hours. This report is a variation of the funding request schedules and the custodian will only need to make minor adjustments to the process that it uses for those reports. This report is submitted electronically.

Total Burden Hours = 1,200 hours.

Custodian Approval – Action Order MPA 4c on chart below

Estimated Number of Respondents = 15 FFEL lenders.

Number of Responses = 15. Agreement only needs to be executed once for the duration of the program.

Burden Hours per Response = 10 hours. Includes time for lender review, including senior management and counsel, form completion, compiling documents and submittal.

Total Burden Hours = 150 hour.

5. **Operational Documents - Master Loan Sale Agreement - Only those who have completed the Master Loan Sales Agreement can complete any of the documents below.**

45-Day Notice of Intent to Sell Loans & Projected Loan Schedule Summary of Loans to Be Sold - Action Order MLSA 2 on chart below

Estimated Number of Respondents = 100 FFEL lenders. Expected number of FFEL lenders who will sell loans to the Department, either directly or when closing a participation interest facility. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 2,000. Frequency depends upon lender need for funding, its business processes, the 45 day notice requirement, and the lender's internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 2 hours. Assumes that, after initial start-up, the lender has developed an automated process for these reports that are submitted electronically.

Total Burden Hours = 4,000 hours

Loan Transfer/Conversion File – Contains Personally Identifiable Information – Action Order MLSA 3 on chart below

Estimated Number of Respondents = 100 FFEL lenders. Expected number of FFEL lenders who will sell loans to the Department, either directly or when closing a participation interest facility. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 2,000. Frequency depends upon lender need for funding, its business processes and the lender's internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 2 hours. Assumes that, after initial start-up, the lender has developed an automated process for these reports that are submitted electronically.

Total Burden Hours = 4,000 hours.

Bill of Sale and Loan Schedule Summaries [MLSA Exhibit B] – Action Order MLSA 4a on chart below

Estimated Number of Respondents = 100 FFEL lenders. Expected number of FFEL lenders who will sell loans to the Department, either directly or when closing a participation interest facility. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 2,000. Frequency depends upon lender need for funding, its business processes and the lender's internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 1 hour. Assumes that, after initial start-up, the lender has developed an automated process for these reports.

Total Burden Hours = 2,000 hours.

Schedule of Loan – Contains Personally Identifiable Information – Action Order MLSA 4b on chart below

Estimated Number of Respondents = 100 FFEL lenders. Expected number of FFEL lenders who will sell loans to the Department, either directly or when closing a participation interest facility. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 2,000. Frequency depends upon lender need for funding, its business processes and the lender's internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 2 hours. Assumes that, after initial start-up, the lender has developed an automated process for these reports that are submitted electronically.

Total Burden Hours = 4,000 hours.

Security Release Certification [MLSA Exhibit E] – Action Order MLSA 4c on chart below

Estimated Number of Respondents = 30 FFEL lenders. Expected number of FFEL lenders who will sell loans to the Department, either directly or when closing a participation interest facility. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 600. Frequency depends upon lender need for funding, its business processes and the lender's internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 1 hour. Assumes that, after initial start-up, the lender has developed an automated process for these reports.

Total Burden Hours = 600 hours.

Notice of Assignment and Designation of Payee – Action Order MLSA 4d on chart below

Estimated Number of Respondents = 20 FFEL lenders. Expected number of FFEL lenders who will sell loans to the Department, either directly or when closing a participation interest facility. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 400. Frequency depends upon lender need for funding, its business processes and the lender's internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 1 hour. Assumes that, after initial start-up, the lender has developed an automated process for these reports.

Total Burden Hours = 400 hours.

5. Operational Documents - Master Loan Sale Agreement

Offer to Sell Form – Action Order 07-08 MLSA 2 on chart below

Estimated Number of Respondents = 50 FFEL lenders. Expected number of FFEL lenders who will sell loans to the Department, either directly or when closing a participation interest facility. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 200. Frequency depends upon lender need for funding, its business processes and the lender's internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 2 hours. Assumes that, after initial start-up, the lender has developed an automated process for these reports.

Total Burden Hours = 400 hours.

Bill of Sale [MLSA Exhibit B] – Action Order 07-08 MLSA 3 on chart below

Estimated Number of Respondents = 50 FFEL lenders. Expected number of FFEL lenders who will sell loans to the Department, either directly or when closing a participation interest facility. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 200. Frequency depends upon lender need for funding, its business processes and the lender's internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 1 hour. Assumes that, after initial start-up, the lender has developed an automated process for these reports.

Total Burden Hours = 200 hours.

Security Release Certification [MLSA Exhibit E] – Action Order 07-08 MLSA 4 on chart below

Estimated Number of Respondents = 20 FFEL lenders. Expected number of FFEL lenders who will sell loans to the Department, either directly or when closing a participation interest facility. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 80. Frequency depends upon lender need for funding, its business processes and the lender's internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 1 hour. Assumes that, after initial start-up, the lender has developed an automated process for these reports.

Total Burden Hours = 80 hours.

Loan Purchase Commitment Program Loan Transfer/Conversion File – Action Order 07-08 MLSA 5 on chart below

Estimated Number of Respondents = 50 FFEL lenders. Expected number of FFEL lenders who will sell loans to the Department, either directly or when closing a participation interest facility. Estimate based upon community input and other indicators of the number of lenders who want to preserve their right to participate in the Loan Purchase Program.

Number of Responses = 200. Frequency depends upon lender need for funding, its business processes and the lender’s internal capacities related to how long it can carry loan financing without ED support.

Burden Hours per Response = 2 hours. Assumes that, after initial start-up, the lender has developed an automated process for these reports.

Total Burden Hours = 400 hours.

Affected Entities: Private Sector

Totals:

Respondents = 2,085 # Responses = 15,195 # Annual Hour Burden = 26,980

On the table below, the Electronic Announcements include the instruments used to gather data either in forms requiring signatures or in data formats to provide individual and aggregate loan information. The Action Order identifies the order that participants must complete the forms and formats to utilize the Loan Purchase Program.

Required to preserve the right to participate in the Loan Purchase Program

Action Order	Electronic Announcement # - Name [Instruments]	Action	Estimated # of Respondents	Number of Responses	Burden Hours/ Response	Total Burden Hours
1	EA9 – Notice of Intent to Participate	File Notice of Intent to Participate	1,000	1,000	1 hour	1,000

Master Participation Agreement (MPA) 2008-2009 and Operational Documents

Under the Loan Participation Purchase Program (Master Participation Agreement), the Department purchases “participation interests” in FFEL loans. Generally, the lender transfers the title to the loan to an unrelated entity, the Custodian. The transferred loans are placed in a “participation facility” under the control of the Custodian. The Custodian sells a participation interest in the loans to the Department on behalf of the lender. The Department buys the

participation interest by providing the Custodian with funds equal to the disbursed amounts of the loans. The Custodian provides those funds to the lender, giving liquidity to the FFEL lender specifically and the FFEL Program generally.

<i>Action Order</i>	<i>Electronic Announcement # - Name [Instruments]</i>	<i>Action</i>	<i>Estimated # of Respondents</i>	<i>Number of Responses</i>	<i>Burden Hours/ Response</i>	<i>Total Burden Hours</i>
MPA1	EA8 – Loan Purchase Agreements EA10 – Initial Document Submission Instructions	Execute Master Participation Agreement (MPA) [Exhibits A, E, F] Follow instructions for document submission	50	50	20 hours	1,000
MPA2	EA15 – Monthly Rolling Forecast Reporting Process	File Rolling Monthly Forecast	50*	600	1	600
MPA3a	EA8 - Loan Purchase Agreements EA16 – Revised Document Submission Process	File Funding Request/Actual Sale of Interest in Loans [Exhibits B, C, D, G] Follow instructions for data submission	50*	1,250	2	2,500
MPA3b	EA16 - Revised Document Submission Process	File Loan Schedule Custodial Cert. Data File (PII)	50*	1,250	2	2,500
MPA4a	EA17 - Monthly Aggregate Settlement Date Report Submission Procedures EA29 – Loan Participation Monthly Reporting and Payment Remittance Procedures	File Monthly Aggregate Settlement Report Follow procedures for reporting data and filing for payment	50*	600	1	600

MPA4b	EA16 - Revised Document Submission Process EA29 - Loan Participation Monthly Reporting and Payment Remittance Procedures	File Monthly Loan Schedule (PII) Follow procedures for reporting data and filing for payment	50*	600	2	1,200
MPA4c	EA14 – Document Submission Instructions for Banks Wishing to Perform as Custodians EA16 - Revised Document Submission Process EA20 – Loan Schedule and Custodial Certification Table Load Procedures	File forms for Custodian Approval Submit Custodial Certification Follow prescribed table load procedures	15*	15	10	150

* = These actions can only be taken if the respondent has completed MPA1.

Master Loan Sale Agreement (MLSA) 2008-2009 and Operational Documents

Under the Loan Purchase Commitment Program (Master Student Loan Agreement), the Department agrees to purchase a loan at a price equal to the outstanding principal balance, plus accrued but unpaid interest owed on the loan, plus a reimbursement of the one percent lender fee, plus \$75 per loan. The lender provides a 45-day notice of intent to sell and the lender and Department work to finalize the roster of loans to be sold and the purchase price. Thus liquidity is provided to the FFEL lender specifically and to the FFEL Program generally.

<i>Action Order</i>	<i>Electronic Announcement # - Name [Instruments]</i>	<i>Action</i>	<i>Estimated # of Respondents</i>	<i>Number of Responses</i>	<i>Burden Hours/ Response</i>	<i>Total Burden Hours</i>
MLSA1	EA8 - Loan Purchase Agreements	Execute Master Loan Sale Agreement (MLSA) [Exhibits A, C,	100	100	12 hours	1,200

	EA23 – Initial Document Submission for the Loan Purchase Commitment Program	D] Follow instructions for document submission				
MLSA2	EA23 - Initial Document Submission for the Loan Purchase Commitment Program	File 45-Day Notice of Intent to Sell Loans & Projected Loan Schedule Summary of Loans to Be Sold	100*	2,000	2	4,000
MLSA3	EA27 – Loan Purchase Commitment Program Loan Transfer/Conversion File	File Loan Transfer/Conversion File (PII)	100*	2,000	2	4,000
MLSA4 a	EA26 – MLSA Bill of Sale Submission Instructions	Instructions for Filing Bill of Sale/Loan Schedule Summary [Exhibit B]	100*	2,000	1	2,000
MLSA4 b	EA26 – MLSA Bill of Sale Submission Instructions	Schedule of Loans (PII)	100*	2,000	2	4,000
MLSA4 c	EA26 – MLSA Bill of Sale Submission Instructions	Security Release Certification [Exhibit E]	30*	600	1	600
MLSA4 d	EA26 – MLSA Bill of Sale Submission Instructions	Notice of Assignment and Designation of Payee	20*	400	1	400

* = These actions can only be taken if the respondent has completed MLSA1.

Master Loan Sale Agreement 2007-2008 (MLSA) and other Operational Documents

Under the Short-term Purchase Program, the Department is extending the offer to purchase fully disbursed loans made for the 2007-2008 academic year. The Department agrees to purchase loans for 97 percent of the total of the outstanding principal balance, plus accrued but unpaid interest as of the purchase date. The lender completes the “Offer to Sell” and the lender and

Department work to finalize the roster of loans to be sold and the purchase price. Thus liquidity is provided to the FFEL lender specifically and to the FFEL Program generally.

<i>Action Order</i>	<i>Electronic Announcement # - Name [Instruments]</i>	<i>Action</i>	<i>Estimated # of Respondents</i>	<i>Number of Responses</i>	<i>Burden Hours/Response</i>	<i>Total Burden Hours</i>
07-08 MLSA1	EA36 – Master Loan Sales Agreement for 2007-2008 Short-Term Purchase Program EA37 - Initial Document Submission Instructions	Execute Master Loan Sale Agreement (MLSA) [Exhibits A, C, D] Follow instructions for document submission	50	50	3 hours	150
07-08 MLSA2	EA38 – “Offer to Sell” Pursuant to MLSA 2007-2008 Short-Term Purchase Program	Submit “Offer to Sell” form	50	200	2 hours	400
07-08 MLSA 3	EA36 – Master Loan Sales Agreement for 2007-2008 Short-Term Purchase Program EA39 – Submission of Bill of Sale and Data Files for Loan Sales under the 2007-2008 Short-Term Purchase Program	File Bill of Sale [Exhibit B]	50	200	1 hour	200
07-08 MLSA 4	EA36 – Master Loan Sales Agreement for 2007-2008	Security Release Certification [Exhibit E]	20	80	1 hour	80

	Short-Term Purchase Program EA39 – Submission of Bill of Sale and Data Files for Loan Sales under the 2007-2008 Short-Term Purchase Program					
07-08 MLSA 5	EA27 – Loan Purchase Commitment Program Loan Transfer/Conversion File EA39 – Submission of Bill of Sale and Data Files for Loan Sales under the 2007-2008 Short-Term Purchase Program	File Loan Transfer Conversion forms Instructions for Submitting Bill of Sale and Loan Detail File and Borrower Benefit Data File.	50	200	2 hours	400

13. Annual Cost Burden to Respondents

There are no annual capital/startup costs to respondents, nor are there any annual costs to respondents associated with operating or maintaining systems or purchasing services.

14. Estimated Annual Cost to the Federal Government

See ED/OMB costs estimates included in other documents related to these programs.

15. Reasons for Changes to Burden Hour Estimated

The burden hours are based primarily on the development of new forms required since the initial collection projections.

16. Collection of Information with Published Results

The results of this information collection will not be published.

17. Approval Not to Display Expiration Date

The Department is not seeking this approval.

18. Exceptions to the Certification Statement

The Department is not requesting any exceptions to the “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-I.

B. Collection of Information Employing Statistical Methods

This information collection does not employ statistical methods.