SUPPORTING STATEMENT

Information Collections Under the Regulations Governing Student Assistance General Provisions.

A. JUSTIFICATION

RIN-1840-AD02

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 request is for approval of the reporting, disclosure and records maintenance requirements that are contained in the Student Assistance General Provisions regulations – Subpart A - §668.6 - Gainful employment in a recognized occupation. Educational programs offered consistent with §668.8(c)(3) are programs that are at least a one-academic year training program that leads to a certificate, or other non-degree recognized credential and that prepares a student for gainful employment in a recognized occupation. Similarly, under §668.8(d) programs offered by a proprietary institution of higher education or by a postsecondary vocational institution of higher education must provide undergraduate training that prepares a student for gainful employment in a recognized occupation.

The Department of Education announced in a September 9, 2009 Federal Register notice (74 FR 46399), the Department's intention to establish negotiated rulemaking committees to prepare regulations under Title IV of the Higher Education Act of 1965, as amended (HEA). These committees were formed as a result of a Federal Register notice published on May 26, 2009 (74 FR 24728) which announced a series of three regional hearings at which interested parties could comment on topics suggested by the Department. The topic "Gainful employment in a recognized occupation" was among the list of program integrity issues announced by the Department.

Purpose and Use of Information Collected

Subpart A – General (OMB control number: 1845-NEW1)

Section 668.6 contains information collection requirements to be approved by OMB. Under the Paperwork Reduction Act of 1995 (44 U.S.C. 3507(d)), the Department of Education is submitting a copy of this section to the Office of Management and Budget (OMB) for its review. We are adding the following new sections:

Section 668.6 – Gainful employment in a recognized occupation.

The final regulations require an institution to report information about students who began attending, as well as, who complete a program that leads to gainful employment in a recognized occupation. Under §668.6(a), institutions are required to develop a process that will collect information to identify students who either begin attending or complete a program that prepares the student for gainful employment in a recognized occupation. Included in the data collection for reporting to the Secretary will be information to identify a student who begins attendance in one of these programs, as well as information that identifies a student who completes one of these programs. In addition, the location of the institution the student attended will be required to be reported, as well as the Classification of Instructional Programs (CIP) codes for each of its programs as defined in §§668.8(c)(3) & (d). That process will include how the institution will report the date the student completed the program, and the amount the student received from private education loans and the amount from institutional financing plans that the student owes the institution after completing the program, and whether the student matriculated to a higher credentialed program at the institution, or evidence that the student transferred to a higher credentialed program at another institution. In the initial reporting year, in accordance with procedures established by the Secretary, institutions must report retroactively for the period beginning July 1, 2006 forward for the 2006-2007, 2007-2008 and the 2008-2009 award years for each student enrolled in an occupational program, as well as, for those students who completed their program. Also in this initial year, after July 1, 2011, institutions will later have to report on the most currently completed 2009-2010 award year. Subsequently, institutions will be reporting thereafter on an annual award year basis.

Under §668.6(b), for each program under this section, the institution must provide prospective students with the name of the occupations (by name and its Standard Occupational Classification (SOC) code) that the program prepares students to enter, along with links to occupational profiles on the Department of Labor's Occupational Information Network (O*Net), or Web links to a representative sample of the SOC codes for which its graduates typically find employment. In addition, institutions are also required to disclose on their Web sites information about on-time graduation rates for students completing the program; the cost of tuition and fees for these programs within normal time, the cost of books and supplies, and room and board, if applicable. The institution may include information on other costs, such as transportation and living expenses, but it must provide a Web link, or access to the program cost information the institution makes available under §668.43. Beginning no later than July 1, 2011, the placement rate for students completing the program, as determined under the institution's accrediting agency or State requirements must be disclosed and identify whether the placement rate was calculated under the accrediting agency or the State's requirements. In lieu of disclosing the accrediting agency or State required placement rates, an institution must disclose the placement rate as determined under a methodology that will be developed by NCES, when that rate is available. Additionally, the institution must separately identify the median loan debt from Title IV, HEA program loans incurred by students and the median loan debt from private loans and institutional financing plans.

For each program, the institution must include the information in §668.6(b) in promotional materials it makes available to prospective students and post this information on its Web site. The information displayed on the institution's Web site must be prominently displayed in a open format that can be retrieved, downloaded, indexed, and searched by commonly use Web search applications. An open format is one that is platform independent, machine readable, and made available to the public without restrictions that would impede the re use of that information.

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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.

Student Assistance General Provisions:

Subpart A – General Section 668.6 – Gainful employment in a recognized occupation
The Department of Education is responsible for evaluating whether students are receiving training in a recognized occupation where they are gainfully employed. The information collected, maintained and submitted by institutions to the Department consistent with the final provisions of this section will allow the institution and the Department to evaluate the outcomes of programs that lead to gainful employment in a recognized occupation, as well as inform prospective students.

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.

Although there are no legal or technical obstacles to the use of technology in this information collection activity, the process for institutions to submit their information to the Department is generally not conducive to any more sophisticated use of technology.

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.

This information is not duplicated on any other information collection.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

No small businesses are affected by this information 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 request for student identification data, CIP codes data, graduation or completion data, along with the disclosure of information about the program on the institution’s Web site, including occupation names and SOC codes, links to occupational profiles on O-Net, the on-time graduation rate for students completing the program, program cost information, placement rate information, and the median loan debt incurred by students is projected to be sufficient for the Department to make determinations about the number of completers or graduates who receive the training needed to become gainfully employed as a result of taking these training programs. The disclosures via the institution’s Web site will provide useful information to prospective students and their families.

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 which 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.

This application is consistent with all of the guidelines in 5 CFR 1320.5(d)(2).

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.

   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.

   A notice of Proposed Rulemaking (NPRM) was published in the Federal Register on June 18, 2010 (75 FR 34806) seeking public comment. In addition to the Notice of Proposed Rulemaking that impacted this information collection – 1840-AD02, a 60-day and 30-day Federal Register notice was published seeking public comment. Two sets of public comments were received on October 21, 2010 following the end of the 30 day comment period under the Paperwork Reduction Act. The Department will exercise due diligence in preparing a response to the comments.

   Prior to the approval of these final regulations the Department negotiated with members of the community during three sessions in early 2010.

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

   There are no payments or gifts to respondents.

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

    There is no assurance of confidentiality provided to institutions for the submission of this information.

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.

There are no questions of a sensitive nature in this application.

12. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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.

- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

- 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 not be included in Item 14.

Section 668.6 – Gainful employment in a recognized occupation.
Section 668.6(a): Programs as provided under §668.8(c)(3) by an institution of higher education that are at least a one-academic year training program that leads to a certificate, or other nondegree recognized credential and that prepares a student for gainful employment in a recognized occupation. Programs as provided under §668.8(d) that are offered by a proprietary institution of higher education or by a postsecondary vocational institution of higher education must provide undergraduate training that prepares a student for gainful employment in a recognized occupation. Institutions offering programs of study that prepare student for gainful employment in a recognized occupation must report for each student who began attending or completed or graduated from the program; information to identify the student and the location of the institution attended; the Classification of Instructional Program (CIP) code for the program the student began attending or completed; the completion or graduation date; and the amount of private education loans and/or institutional financing received by the student, and whether the student matriculated to a higher credentialed program at the institution or evidence that the student transferred to a higher credentialed program at another institution. Each institution must develop a process to collect and report this data. We estimate that development of these processes to increase burden by 67,212 hours.

AFFECTED ENTITES and BURDEN:
We estimate that 1,915 proprietary institutions will, on average, spend 12 hours to develop their processes to record student identifier information for students who began attendance and for students who completed their program of study, to associate CIP codes

to their occupational training programs, to record program completion dates and collect information on the amounts program completers received in private educational loans and institutional financing plans, as well as whether students matriculated to higher credentialed programs at the same or another institution.

We estimate that 1,736 private non-profit institutions will, on average, spend 12 hours to develop their processes to record student identifier information for students who began attendance and for students who completed their program of study, to associate CIP codes to their occupational training programs, to record program completion dates and collect information on the amounts program completers received in private educational loans and institutional financing plans, as well as whether students matriculated to higher credentialed programs at the same or another institution.

We estimate that 1,915 public institutions will, on average, spend 12 hours to develop their processes to record student identifier information for students who began attendance and for students who completed their program of study, to associate CIP codes to their occupational training programs, to record program completion dates and collect information on the amounts program completers received in private educational loans and institutional financing plans, as well as whether students matriculated to higher credentialed programs at the same or another institution.

	# of Responses:	# of Respondents:	# of Burden Hours:
PROPRIETARY:			
	1,950	1,950	23,400
PRIVATE NON-PROFIT:			
	1,736	1,736	20,832
PUBLIC:			
	1,915	1,915	22,980
TOTAL Process Development for recordkeeping:			
	5,601	5,601	67,212

<u>Section 668.6(a)</u>: The final regulations require institutions to report to the Secretary student identifier information for each student who began attendance in a program that leads to gainful employment in a recognized occupation and the location of the institution the student attended, and to report the student identifier information and the location of the institution for each student who completes or graduates from that program during an award year. In addition, the institution must also report the CIP code of the program that the student began attending or completed, the date the student completed the program, and the amounts of private education loans and institutional financing that the student received after completing the occupational program and whether the student matriculated

to a higher credentialed program at that institution or transferred to a higher credentialed program at another institution.

AFFECTED ENTITES and BURDEN:

Students who began attendance in a program leading to gainful employment during the 2006-2009 Award Years:

We estimate that there will be 3,499,998 students who begin attendance per year in these occupational programs, therefore the total number over a three-year period is estimated to be 10,499,994 students during the 2006-2009 Award Years.

We estimate that 1,996,593 of the 3,499,998 students will begin an occupational programs at proprietary institutions. We project that over the three-year period there will be 5,989,779 affected students. We estimate that the reporting of student identifier information, the location of the institution, and CIP codes for each beginning student will be .03 hours (2 minutes) per student or 179,693 burden hours.

We estimate that 161,308 of the 3,499,998 students will begin an occupational program at private not-for-profit institutions. We project that over the three-year period there will be 483,924 affected students. We estimate that the reporting of student identifier information, the location of the institution, and CIP codes for each beginning student will be .03 hours (2 minutes) per student or 14,518 burden hours.

We estimate that 1,342,097 of the 3,499,998 students will begin an occupational programs at public institutions. We project that over the three-year period there will be 4,026,291 affected students. We estimate that the reporting of student identifier information, the location of the institution, and CIP codes for each beginning student will be .03 hours (2 minutes) per student or 120,789 burden hours.

	# of Responses:	# of Respondents:	# of Burden Hours:
PROPRIETARY:			
	5,989,779	5,989,779	179,693
PRIVATE NON-PROFIT:			
	483,924	483,924	14,518
PUBLIC:			
	4,026,291	4,026,291	120,789
Total	10,499,994	10,499,994	315,000

Students who complete a program leading to gainful employment during the 2006-2009 Award Years:

We estimate that there will be 567,334 students who complete an occupational program per year, therefore the total projected number of completers over a three-year period is estimated to be 1,702,002 students during the 2006-2009 Award Years.

We estimate that 325,416 of the 567,334 students will complete an occupational program at proprietary institutions. We project that over the three-year period there will be 976,248 affected students. We estimate that the reporting of student identifier information, the location of the institution, the CIP codes for each student completing their program, the date of completion, the amounts of private education loans and institutional financing to be repaid after the completion date, as well as, whether a student matriculated to a higher credentialed program at that same or another institution will be .08 hours (5 minutes) per student or 78,100 burden hours.

We estimate that 33,627of the 567,334 students will complete an occupational program at private not-for-profit institutions. We project that over the three-year period there will be 100,881 affected students. We estimate that the reporting of student identifier information, the location of the institution, the CIP codes for each student completing their program, the date of completion, the amounts of private education loans and institutional financing to be repaid after the completion date, as well as, whether a student matriculated to a higher credentialed program at that same or another institution will be .08 hours (5 minutes) per student or 8,070 burden hours.

We estimate that 208,291 of the 567,334 students will complete an occupational program at public institutions. We project that over the three-year period there will be 624,873 affected students. We estimate that the reporting of student identifier information, the location of the institution, the CIP codes for each student completing their program, the date of completion, the amounts of private education loans and institutional financing to be repaid after the completion date, as well as, whether a student matriculated to a higher credentialed program at that same or another institution will be .08 hours (5 minutes) per student or 49,990 burden hours.

	# of Responses:	# of Respondents:	# of Burden Hours:
PROPRIETARY:	976,248	976,248	78,100
PRIVATE NON-PROFIT:	100,881	100,881	8,070
PUBLIC:	624,873	624,873	49,990
Total	1,702,002	1,702,002	136,160

Students who began attendance in a program leading to gainful employment during the 2009-2010 Award Year:
We estimate that there will be 3,499,998 students who begin attendance per year in these occupational programs during the 2009-2010 Award Year.

We estimate that 1,996,593 of the 3,499,998 students will begin an occupational program at proprietary institutions. We estimate that the reporting of student identifier information, the location of the institution, and CIP codes for each beginning student will be .03 hours (2 minutes) per student or 59,898 burden hours.

We estimate that 161,308 of the 3,499,998 students will begin an occupational program at private not-for-profit institutions. We estimate that the reporting of student identifier information, the location of the institution, and CIP codes for each beginning student will be .03 hours (2 minutes) per student or 4,839 burden hours.

We estimate that 1,342,097 of the 3,499,998 students will begin an occupational programs at public institutions. We estimate that the reporting of student identifier information, the location of the institution, and CIP codes for each beginning student will be .03 hours (2 minutes) per student or 40,293 burden hours.

	# of Responses:	# of Respondents:	# of Burden Hours:
PROPRIETARY:			
	1,996,593	1,996,593	59,898
PRIVATE NON-PROFIT:			
	161,308	161,308	4,839
PUBLIC:			
	1,342,097	1,342,097	40,293
Total	3,499,998	3,499,998	105,000

Students who complete a program leading to gainful employment during the 2009-2010 Award Years :

We estimate that there will be 567,334 students who complete an occupational program per year during the 2009-2010 Award Year.

We estimate that 325,416 of the 567,334 students will complete an occupational program at proprietary institutions. We estimate that the reporting of student identifier information, the location of the institution, the CIP codes for each student completing their program, the date of completion, the amounts of private education loans and institutional financing to be repaid after the completion date, as well as, whether a student matriculated to a higher credentialed program at that same or another institution will be .08 hours (5 minutes) per student or 26,033 burden hours.

We estimate that 33,627of the 567,334 students will complete an occupational program at private not-for-profit institutions. We estimate that the reporting of student identifier information, the location of the institution, the CIP codes for each student completing their program, the date of completion, the amounts of private education loans and institutional financing to be repaid after the completion date, as well as, whether a student matriculated to a higher credentialed program at that same or another institution will be .08 hours (5 minutes) per student or 2,690 burden hours.

We estimate that 208,291 of the 567,334 students will complete an occupational program at public institutions. We estimate that the reporting of student identifier information, the location of the institution, the CIP codes for each student completing their program, the date of completion, the amounts of private education loans and institutional financing to be repaid after the completion date, as well as, whether a student matriculated to a higher credentialed program at that same or another institution will be .08 hours (5 minutes) per student or 16,663 burden hours.

	# of Responses:	# of Respondents:	# of Burden Hours:
PROPRIETARY:			
	325,416	325,416	26,033
PRIVATE NON-PROFIT:			
	33,627	33,627	2,690
PUBLIC:			
	208,291	208,291	16,663
Total	567,334	567,334	45,387
TOTAL Recordkeeping and Reporting:			
	16,274,929	16,274,929	668,758

<u>Section 668.6(b)</u>: Under §668.6(b), for each program offered by an institution under this section, the institution must disclose to each prospective student, the name of each program and its Standard Occupational Classification (SOC) code, along with links to occupational profile information as reported on the Department of Labor's Occupational Information Network (O*Net), or Web links to a representative sample of the SOC codes for which the institution's graduates typically find employment after completion of their program of study that prepared them for gainful employment. In addition, institutions are also required to disclose on their Web sites information about on-time graduation rates for students completing the program, the total amount of tuition and fees it charges a student for completing the program within the normal time it takes a student to complete

all the program requirements, (as published in the institutions catalog), and the typical costs for books and supplies and room and board, if applicable. The institution may include other information about other costs, but it must provide a Web link, or access to the program cost information where the institution makes available its accreditation, approval or licensing information to all enrolled or prospective students. Beginning no later than July 1, 2011, the institution must disclose the placement rate for students completing the program, as determined under the institution's accrediting agency or State requirements. In lieu of the disclosure of placement rate information, the institution will disclose its placement rate once a methodology is developed by NCES and the rate is made available to the institution. The institution is required to disclose the median debt incurred by students who completed the program, as provided by the Secretary, as well as any other information the Secretary provided to the institution about that program. The institution must identify separately the median loan debt from Title IV, HEA program loans, and the median loan debt from private educational loans and institutional financing plans. For each occupational program, the institution must include these disclosures in its promotional materials it makes available to prospective students and post the information on its Web site.

AFFECTED ENTITES and BURDEN:
We estimate that of the 5,601 institutions with these programs that 1,950 are proprietary institutions or 35%. We estimate that of the 5,601 institutions with these programs that 1,736 are private non-profit institutions or 31%. We estimate that of the 5,601 institutions with these programs that 1,915 are public institutions or 34%. Because under the revised disclosure requirements, institutions may use a representative sample of SOC codes and use placement rate data that their accrediting agency or the State already requires, or data that will be provided by the Department, we estimate that on average, it will take approximately 1.5 hours per institution to obtain the required disclosure information from O*Net and its own programmatic cost information and to provide that information on its institutional Web site and in its promotional materials.

	# of Responses:	# of Respondents:	# of Burden Hours:
PROPRIETARY:			
	1,950	1,950	2,925
PRIVATE NON-PROFIT:			
	1,736	1,736	2,604
PUBLIC:			
	1,915	1,915	2,873
Total:	5,601	5,601	8,402

Total for Recordkeeping:			
	5,601	5,601	67,212
Total for Reporting:			
	16,274,929	16,274,929	609,948
GRAND TOTAL:			
	16,280,530	16,280,530	677,160

For additional information, please see the supplementary document "Burden Analysis- 1845-NEW1 – 1840-AD02".

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 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.

Total Annualized Capital/Startup Cost	: $0
Total Annual Costs (O&M)	: $0

Total Annualized Costs Requested : $0

There are no startup costs.

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.

There are no additional costs to the Federal government as a result of the final regulations.

15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.

This is a new collection package, therefore all burden is new. The burden increase of 677,160 hours is a program change due to changing regulations.

Respondents, Responses and Burden Hours:

	# of Respondents	# of Responses	# Hrs Burden
Section 668.6 – Gainful employment in a recognized occupation.			
Section 668.6(a):			
Process development (recordkeeping)-	5,601	5,601	67,212
Reporting –	16,269,328	16,269,328	591,546
Section 668.6(b):			
Disclosures -	5,601	5,601	8,402
Total:	16,280,530	16,280,530	677,160

Current Inventory:

# of Respondents	# of Responses	# Hrs

		Burden
-0-	-0-	-0-

Revised Inventory:

# of Respondents	# of Responses	# Hrs Burden
16,280,530	16,280,530	677,160

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.

    This information 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. The OMB expiration dates will be displayed in the Federal Register once approved.

18. Explain each exception to the certification statement identified in the "Certification for Paperwork Reduction Act Submissions."

    There are no exceptions to the certification.