

Table I for 1894-0009 Supporting Statement #2
Recordkeeping and Reporting Requirements in the
Education Department General Administrative (EDGAR) Regulations

“CFR” refers to Code of Federal Regulations.

Section of 34 CFR	Title	Description of Recordkeeping or Reporting Requirement	Recordkeeping Burden Hrs.	Reporting Burden Hrs.
74.25	Budget/ program revisions.	Part 74 of EDGAR applies to Institutions of Higher Education (IHEs), nonprofit organizations (NPOs), and hospitals. Of the approximately 11,050 discretionary grants (new and non-competing continuation grants) that ED awards annually, 8,500 grants were awarded to IHEs, NPOs, and hospitals. Under 34 CFR 74.25 of EDGAR, very few project revisions require prior approval. It is estimated that ED will receive approximately 1,105 prior approval requests from grantees per year (represents 10% of the 11,050 grants awarded annually) and that approximately 850 of those requests will be submitted by IHEs, NPOs, and hospitals (represents 10% of the approximately 8,500 grants awarded to IHEs, NPOs and hospitals annually). Additionally, under 34 CFR 75.261, all types of grantees including State Educational Agencies (SEAs), Local Educational Agencies (LEAs), and Federally Recognized Indian Tribal Governments may follow the regulations in 34 CFR 74.25 (e)(2) regarding extension of a project period. Section 74.25 (e)(2) allows grantees to initiate a one-time extension of their projects’ expiration date of up to 12 months without prior approval from ED. Grantees, however, must notify the Department that they intend to extend their grants and indicate the supporting reasons for the extension and the revised expiration date. Bases on FY 2009 time extension data from the Grant Administration and Payment System (GAPS), approximately 3783 grantees annually will receive this one-time extension of up to 12 months of their project periods. REPORTING BURDEN		(Prior Approval Requests: 850 responses x 1 hr. = 850 hrs.) (Time Extension Notifications: 3,783 responses X 1 hr. = 3783 hours) Total Reporting Burden Hours for 34 CFR 74.25 = 4633 hours
74.44	Procurement Procedures.	It is estimated that approximately 20% (1,700) of the 8,500 IHE, NPO and hospital recipients must keep records on procurement actions under their discretionary grants. RECORDKEEPING BURDEN	1,700 responses x 10 hrs. = 17,000 hrs.	
74.45	Cost and price analysis.	Justification and burden hours for 34 CFR 74.45 are included under 34 CFR 74.44.		
74.46	Procurement records.	Justification and burden hours for 34 CFR 74.46 are included under 34 CFR 74.44.		
74.47	Contract Adminis-	Justification and burden hours for 34 CFR 74.47 are included under 34 CFR 74.44.		

	tration.			
--	----------	--	--	--

**Table I for 1894-0009 Supporting Statement #2
Recordkeeping and Reporting Requirements in the
Education Department General Administrative (EDGAR) Regulations**

Section of 34 CFR	Title	Description of Recordkeeping or Reporting Requirement	Recordkeeping Burden Hrs.	Reporting Burden Hrs.
74.72	Subsequent Adjustments.	It is estimated that approximately 10% (850) of the 8500 IHE, NPO and hospital recipients would have to make subsequent adjustments to records due to audits or other reviews. RECORDKEEPING BURDEN	850 responses X 10 hours = 8500 hrs.	
75.119 cross referenced to 76.656	Information needed if private school students participate.	It is estimated that approximately 10% (1105) of 11,050 ED discretionary grant recipients include students from private schools in their applications. This information would be a part of the original application narrative. REPORTING BURDEN		1105 responses x 1 hr. = 1105 hrs.
75.261	Extension of a project period.	It is estimated that annually, approximately 121 grant recipients will request a second (or more) extension of their project periods that requires prior approval from ED (based on FY 2009 time extension data from GAPS). Note that recipients under the four National Institute on Disability and Rehabilitation Research programs listed in 34 CFR 75.261 (b) of EDGAR must request prior approval for <i>any</i> time extension. The burden hours for any of these NIDRR grantees that request and receive a time extension are included with the burden hour calculations for one-time extension listed above under 34 CFR 74.25. REPORTING BURDEN		121 responses X 1 hr.= 121 hrs. (Note: the burden hours for time extension requests for grantees in the NIDRR programs listed under EDGAR, 75.261 (b) are included with the burden hours for one-time extensions listed under 34 CFR 74.25 (e)(2)).
80.30	Changes.	It is estimated that approximately 10% (255) of 2550 State Educational Agencies (SEAs), Local Educational Agencies (LEAs) and Federally-Recognized Indian Tribal Governments will request changes to their projects that require prior approval from ED. Very few changes require prior approval and information from grantees.		255 responses x 1 hr. = 255 hrs.

		REPORTING BURDEN		
80.36	Procurement.	It is estimated that approximately 20% (510) of the 2550 SEA, LEA and tribal government recipients must keep records on procurement actions under their discretionary grants. RECORDKEEPING BURDEN	510 responses x 10 hours = 5100 hrs.	
		TOTAL BURDEN HRS. = 42,828	Total Recordkeeping Burden Hours = 36,714	Total Reporting Burden Hours = 6,114