

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 hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section¹. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

The College Cost Reduction and Access Act (the CCRAA), Pub. L. 110-84, established the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program under Part A of the Higher Education Act of 1965, as amended (the HEA). The regulations for this program are in 34 CFR 686.

The following sections of the TEACH Grant regulations in 34 CFR 686 are included in this information collection: 686.4, 686.11, 686.32, and 686.34. These regulations can be reviewed at <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=694d546b2e2ed3342ef469e9d2a7d898&rgn=div5&view=text&node=34:4.1.1.1.4&idno=34>.

The regulations in 686.4 require an institution that ceases to participate in the TEACH Grant program or becomes ineligible to participate during an award year, to report to the Department of Education within 45 days after the effective date of the loss of eligibility. The report must include the name of each TEACH Grant eligible student; the amount of the TEACH Grant funds paid to each student for that award year; and the amount of TEACH Grant funds due each eligible student through the end of the payment period. Also, the institution must provide an accounting of all TEACH Grant expenditures for that award year to the date of termination.

The regulations in 686.11 establish that in addition to meeting the student eligibility requirements, in order to receive a TEACH Grant the applicant must submit the designated application, sign a TEACH Grant service agreement, and enroll in a TEACH Grant eligible institution. In addition, the grant recipient must either maintain a cumulative grade point average of 3.25 on a 4.0 scale during each payment period or

¹ Please limit pasted text to no longer than 3 paragraphs.

score above the 75th percentile on at least one of the battery of nationally- normed standardized test.

The regulations in 686.32 require an institution to provide initial, subsequent, and exit counseling to each TEACH Grant recipient.

The regulations in 686.34 require the institution to promptly provide written notification to a student requesting repayment of any overpayment that the institution does not have responsibility to repay. The regulations also require that the institution refer the student to the Department if the student does not take positive action to promptly resolve the TEACH Grant overpayment.

This is a request for a revision of the existing burden hours in collection 1845-0084 which provides for program administration and is necessary to determine eligibility to receive program benefits and to prevent fraud and abuse of program funds.

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.

The TEACH Grant program is maintained at participating institutions of higher education. The majority of the collection requirements are for recordkeeping at the institution. The required reporting to the Department of Education (Department) relates to ceasing participation or losing eligibility to participate. To date there has not been any instance of an institution that has ceased to or has lost eligibility to participate.

The recordkeeping and reporting requirements of these regulations assure accountability of program participants for proper program administration and justify the payment of funds by the federal government. The collection of this information aids in assuring that the Federal dollars are not lost to fraud, waste or abuse.

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 given to using technology to reduce burden.

The required enrollment for institutions of higher education in the TEACH Grant program is done through the e-Application process, the disbursement and overpayment reporting is done through the Common Origination and Disbursement system. These are all electronic systems operated by the Department.

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

These regulations were created with the participation of affected parties who had a vested interest in avoiding duplication. The required information is not captured in any other Department system.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

No small businesses are impacted 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 recordkeeping and reporting requirements are necessary to ensure accountability of program participants for proper program administration and less frequent collection could impair accountability of program participants.

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 that 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.

The collection of this information will be conducted in a manner that is consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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.

The regulations have not changed since their original presentation during the negotiated rulemaking and the final rule process. As part of the current clearance process, notices published in the Federal Register providing the public with two opportunities to submit comments.

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

No payments of gifts will be provided to the respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.² If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

A Privacy Act Notice is included on the Free Application for Federal Student Aid (FAFSA) application form and the TEACH Grant Agreement to Serve. In both of these

² Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

forms, the applicant is informed of the statutory authority for collecting the information requested. Although the disclosure of the information is voluntary, the recipient is informed that in order to be considered for TEACH Grant funds, the information must be provided.

The information provided is used to verify the grant recipient's identity, to determine the grant recipient's eligibility to receive the TEACH Grant benefits, and in those cases where a TEACH Grant is converted into a Direct Unsubsidized Loan, to permit the servicing of the borrower's loan(s), and to locate the borrower and collect on the loan(s) if the loan(s) become delinquent or default. A listing of the persons and entities to which the information may be disclosed and for what purposes the information may be disclosed is also included.

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.

The Department is not requesting any sensitive data.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. 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 in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)
- 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 be included in Item 14.

TEACH Grants:

Section 686.4 – Institutional participation

The regulations require an institution that ceases to participate in the TEACH Grant program or becomes ineligible to participate during an award year, to report to the Department of Education within 45 days after the effective date of the loss of eligibility. The report must include the name of each TEACH Grant eligible student; the amount of the TEACH Grant funds paid to each student for that award year; and the amount of TEACH Grant funds due each eligible student through the end of the payment period. Also, the institution must provide an accounting of all TEACH Grant expenditures for that award year to the date of termination.

Burden Assessment:

Since the program’s inception, 17% or 971 of the 5,709 Title IV eligible institutions have participated in the TEACH Grant program. No institution has officially withdrawn from the program. Therefore, we are adjusting to .5% or 5 the estimated number of institutions that will cease to participate or lose eligibility to participate in the program.

The program’s participation rate has been higher than estimated in the previous burden calculation. The 2012 Fiscal Year (FY12) budget request indicates 25,000 TEACH Grant recipients. There would be an average of 26 students participating in the program at each eligible institution. To meet the reporting requirements, we estimate that the burden associated with ceasing participation or losing eligibility would be 33 hours.

# of Eligible Institutions		5,709
% of Institutions participating in TEACH Grant Program	X	<u>.1700</u>
# of Participating Institutions		971
Projected % of Institutions ceasing Participation or becoming ineligible	X	<u>.005</u>
# of Affected Institutions		5
Projected # of TEACH Grant eligible Students		25,000
Divided by # of Participating Institutions		<u>971</u>
Average projected number of students Participating in TEACH Grant program At each Institutions		26
Average projected amount of time to report Student and funding data at 15 minutes per student record	X	<u>.25 hours</u>
Burden hours per affected institutions		6.5 hours
Times the # of affected institutions	X	<u>5</u>
Total Burden Hours		33 hours

Affected Entities:

	# of Respondents	# of Responses	Hours/ response	Total hours
Business or other for-profits	1	1	6.5	6.5
Not-for-profits	2	2	6.5	13
<u>Public institutions</u>	<u>2</u>	<u>2</u>	<u>6.5</u>	<u>13</u>
TOTAL	5	5		33

This represents an increase in burden of 17 hours.

Section 686.11 – Eligibility to receive a grant

The regulations establish that in addition to meeting the student eligibility requirements, to receive a TEACH grant, the applicant must submit the designated application, sign a TEACH Grant service agreement, and enroll in a TEACH Grant eligible institution. Grant recipients must either maintain a grade point average of 3.25 on a 4.0 scale during each payment period, score above the 75th percentile on a least one of a battery of nationally-normed standardized tests, or qualify as a current or retired teacher obtaining a master’s degree in a TEACH eligible program.

There are several categories of grant recipients where the cumulative grade point average of 3.25 must be maintained each payment period. Those categories are:

I. The initial payment period:

The final cumulative high school GPA for a first term undergraduate recipient –
 The TEACH eligible institution must document the student’s secondary school GPA from an LEA, an SEA or other State agency, a public or private high school, or in the case of a home schooled student, obtain documentation of the secondary school GPA from the parent or guardian.

The undergraduate cumulative GPA for either the post-baccalaureate or graduate student recipient –

The TEACH eligible institution must document the student’s undergraduate school GPA.

The transfer student cumulative GPA as determined by the current TEACH Grant eligible institution –

The TEACH eligible institution must document the student’s GPA based upon the method established by the institution to accept coursework completed from any prior postsecondary institution that it accepts.

II. Subsequent payment periods:

The cumulative GPA based on courses taken at the TEACH eligible institution through the most-recently completed payment period, or

III. Alternatives to the cumulative GPA:

Scoring above the 75th percentile of at least one of the battery of test from a nationally-normed standardized test, or
 The grant recipient is currently a teacher or retiree who is applying for a TEACH Grant to obtain a master's degree in an eligible TEACH Grant program.

Burden Assessment:

Approximately 7% of applicants for the 2010-2011 award year indicated an interest in the TEACH Grant on the FAFSA form. That would mean approximately 1.542 million applicants for the TEACH Grant. Considering an applicant to enrollment ratio of 50%, the number of applicants for the TEACH Grant program would be 771,000 however, early data indicates that 10% of the 1.542 million approximately 154,200 will actually apply. The burden assessment below breaks out burden attributable to projected applicants as well as projected recipients.

Initial payment period:	# of Respondents	Hours/ response	Total hours
High school GPA			
Applicants	13,878	.250	3,470
Recipients	2,250	.250	563
Undergraduate GPA			
Applicants	41,634	.017	708
Recipients	6,750	.017	115
Transfer student GPA			
Applicants	13,878	.167	2,318
Recipients	2,250	.167	376
Subsequent payment period:	# of Respondents	Hours/ response	Total hours
All recipients X .80	20,000	.017	340
Standardized tests			
Applicants	67,848	.017	1,153
Recipients	11,250	.017	191
Current Teachers/Retirees			
Applicants	16,962	.167	2,833
Recipients	2,500	.167	417
Subtotals			
Applicants	154,200		
Recipients	25,000		
Subsequent recipients	20,000		
TOTALS	199,200		12,484

Affected Entities:

	# of Respondents	# of Responses	Hours/ response	Total hours
INDIVIDUALS:				
High School GPA				
Home school parents	13	13	.330	4
INSTITUTIONS:				
Business or other for-profits	1,992	2,016	.062	125
Not-for-profits	105,569	106,694	.062	6,615
Public institutions	91,626	92,581	.062	5,740
TOTAL:	199,200	201,304		12,484

This represents a decrease in burden of 172 hours.

Section 686.32 – Counseling requirements

The regulations require an institution to provide initial, subsequent and exit counseling to each TEACH Grant recipient. The initial counseling is required prior to making the first disbursement of the grant. Initial counseling must include, but is not limited to explaining the terms and conditions of the TEACH Grant service agreement; to provide information on how to identify low-income schools and documented high need fields; to inform grant recipients of the possibility of a suspension of the eight-year period for completion of the service agreement and the conditions under which a suspension may be granted. In subsequent counseling, which must occur prior to the first disbursement of a TEACH Grant in a subsequent award year, it must include, but is not limited to reviewing the terms and conditions of the service agreement; emphasizes that if the student fails or refuses to complete the service agreement, the TEACH Grant will convert into a Federal Direct Unsubsidized Loan. Under the final regulations, institutions are required to provide exit counseling before the recipient ceases to attend the institution. Written exit counseling materials may be provided within 30 days after completing a study abroad program or after a student withdraws without notifying the institution.

Types of TEACH Grant counseling:

In-person: We project that an in-person presentation (individual or group) will take approximately .33 hours (20 minutes) per presentation. We project that 44 institutions new to the program will require 10 hours to develop the required in-person presentation materials that will cover the three types of counseling required. We project that 927 participating institutions will annually update the in-person presentation materials that will cover the three types of counseling required and will require 1 hour for review and revision.

Audio-visual (A/V) presentation: We project that the A/V presentation will take approximately .33 hours (20 minutes) per presentation. We project that 30 institutions new to the program will require 6 hours to develop the A/V presentation materials that will cover the three types of counseling required. We project that it will take 1 hour annually to review and update an A/V presentation that will cover the three types of

counseling required and we project that 375 institutions will update such A/V presentations.

Interactive (on-line): We project that the on-line presentation will take approximately .33 hours (20 minutes) per presentation. We project that it will take 30 institutions new to the program will require 7 hours to develop the on-line presentation that will cover the three types of counseling required. We project that it will take 1 hour annually to review and update an on-line presentation that will cover the three types of counseling required and we project that 445 institutions will update such on-line counseling presentations.

Affected Entities:

INDIVIDUALS

Recipient Initial counseling:

We project that 20% of the 25,000 recipients or 5,000 recipients will require Initial Counseling

Recipient Subsequent counseling:

We project that 80% of the recipients or 20,000 recipients will need subsequent counseling in a year of their TEACH Grant program participation.

Recipient Exit counseling:

We project that 20% of the recipients or 5,000 recipients will need Exit counseling in a year of the TEACH Grant program.

Respondents:	Responses:
Initial Counseling	5,000
Subsequent Counseling	20,000
<u>Exit Counseling</u>	<u>5,000</u>
Total # of Respondents	30,000 x .33 hrs = 9,900 burden hours

INSTITUTIONS

In-person counseling:

927 institutions
Presentation review and update x 1 hour
927 hours

Presentation development 44 institutions
x 10 hours
440 hours

Providing in-person counseling

We project that 10% of the recipients will want in-person counseling and that the counseling will average 20 minutes (.33 hours).

25,000 recipients
x .10
2,500
x .33 hours
825 hours

AV Counseling:	375 institutions
Presentation review and update	<u>x 1 hour</u> 375 hours
Presentation development	30 institutions <u>x 6 hours</u> 180 hours
Providing AV counseling	
We project that 10 % of the recipients will want AV counseling and that the counseling will average 20 minutes (.33 hours).	
	25,000 recipients <u>x .10</u> 2,500 <u>x .33 hours</u> 825 hours
On-Line Counseling:	445 institutions
Presentation review and update	<u>x 1 hour</u> 445 hours
Presentation development	30 institutions <u>x 7 hours</u> 210 hours
Providing AV counseling	
We project that 80 % of the recipients will want on-line counseling and that the counseling will average 20 minutes (.33 hours).	
	25,000 recipients <u>X .80</u> 20,000 <u>X .33 hours</u> 6,600 hours
Annual Review and Update:	
In-person counseling	927 hours
AV	375 hours
On-line	<u>445 hours</u>
Sub-Total	1,747 hours
Initial Development:	
In-person counseling	440 hours
AV	180 hours
On-line	<u>210 hours</u>
Sub-Total	830 hours

Actual Counseling:	
In-person counseling	825 hours
AV	825 hours
On-line	<u>6,600 hours</u>
Sub-Total	8,250 hours
 TOTAL	 10,827 hours

Affected Entities:

	# of Respondents	# of Responses	Hours/ response	Total hours
INDIVIDUALS:	30,000	30,000	.330	9,900
INSTITUTIONS:				
Business or other for-profits	10	10	11.15	112
Not-for-profits	515	515	11.15	5,742
<u>Public institutions</u>	<u>446</u>	<u>446</u>	<u>11.15</u>	<u>4,973</u>
TOTAL:	30,971	30,971		20,727

This represents a decrease in burden of 1,682 hours.

Section 686.34 – Liability for and recovery of TEACH Grant overpayments

The regulations require the institution to promptly provide written notification to a student requesting repayment of any overpayment that the institution does not have responsibility to repay. We project that .1% of the estimated 25,000 recipients will owe a TEACH Grant overpayment. However, all eligible institutions must have a written notice for requesting repayment of a TEACH Grant overpayment when a student has responsibility to repay along with notification that the student will become ineligible for additional Title IV, HEA program funds. The participating institutions must establish procedures to refer an overpayment when a student fails to make satisfactory repayment arrangements or fully repay the overpayment.

We estimate that it will take students .167 hours (10 minutes) to read the written notification and respond to the TEACH Grant overpayment notice. And we estimate that each participating institution will require .33 hours (20 minutes) to annually review the notification and make the required referrals.

Affected Entities:

	# of Respondents	# of Responses	Hours/ response	Total hours
INDIVIDUALS:	25	25	.167	4
INSTITUTIONS:				
Business or other for-profits	10	10	.33	3
Not-for-profits	515	515	.33	170
<u>Public institutions</u>	<u>446</u>	<u>446</u>	<u>.33</u>	<u>147</u>
TOTAL:	996	996		324

This is a decrease of 288 burden hours.

Current Burden Associated with the Regulations:

# of Respondents	# of Responses	#Burden Hours
207,347	211,097	35,695

Revised Burden Associated with the Regulations after Review:

# of Respondents	# of Responses	#Burden Hours
231,172	233,276	33,568

Difference:

# of Respondents	# of Responses	#Burden Hours
+23,825	+22,179	-2,127

While the number of applicants has increased, the amount of time the institutions need to review and update their presentations to students has decreased and there are fewer new institutions entering the program and developing the counseling presentations thus there is a net reduction in burden hours even with an increase in respondents and responses.

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 acquiring and maintaining 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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12

Total Annualized Capital/Startup Cost	:	\$21,687.90
Total Annual Costs (O&M)	:	\$45,649.11
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Total Annualized Costs Requested	:	\$67,337.01

We estimate that there will be cost associated with the development and updating of the counseling materials required to ensure compliance with 34 CFR 686.32 as startup costs.

Cost of developing:

In-person counseling:

Estimated development time	10 hours
Hourly salary for a GS-8, Step 6	\$ 26.13
	\$ 261.30
	<u>X 44 institutions</u>
	\$11,497.20

Audiovisual counseling:

Estimated development time	6 hours
Hourly salary for a GS-8, Step 6	\$ 26.13
	\$ 156.78
	<u>X 30 institutions</u>
	\$ 4,703.40

On-line (interactive) counseling:

Estimated development time	7 hours
Hourly salary for a GS-8, Step 6	\$ 26.13
	\$ 182.91
	<u>X 30 institutions</u>
	\$ 5,487.30

We estimate that there will be cost associated with the development and updating of the counseling materials required to ensure compliance with 34 CFR 686.32 as annual overhead costs

Cost of reviewing/updating:

In-person counseling:

Estimated reviewing/updating time	1 hours
Hourly salary for a GS-8, Step 6	\$ 26.13
	\$ 26.13
	<u>X 927 institutions</u>
	\$24,222.51

Audiovisual counseling:

Estimated reviewing/updating time	1 hours
Hourly salary for a GS-8, Step 6	\$ 26.13
	\$ 26.13
	<u>X 375 institutions</u>
	\$ 9,798.75

On-line (interactive) counseling:	
Estimated development time	1 hours
Hourly salary for a GS-8, Step 6	<u>\$ 26.13</u>
	\$ 26.13
	<u>X 445 institutions</u>
	\$11,627.85

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 estimated cost to the Department for maintaining the TEACH Grant program is \$3,125,000.00.

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

The decrease in burden of 2,127 hours to a new total burden of 33,568 hours as identified in section 12 is an adjustment resulting from a review of the anticipated participation rate based on the FY 2012 budget request and a change from the development phase of the counseling processes by the participating institutions to the maintenance phase of the recordkeeping and reporting requirements of the participating institutions.

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 result of the collection of 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.

The Department is not seeking this approval.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

The Department is not requesting any exceptions to the “Certification for Paperwork Reduction Act Submission”.