

Mr. Babel:

Thank you for taking the time to submit comments on the form and burden estimates for the Foreign Graduate Medical School Consumer Information Reporting Form ED-2012-ICCD-0069. Your comments have been reviewed and below is our response including any changes made to the proposed instructions and form.

Your letter included 3 sections with questions and comments.

The first section asked for clarification in the instructions referencing the definition of U.S. students and the reporting period.

#### “Instructions

There are two areas within the Consumer Information Reporting Form instructions for which we would like to request clarification: definition of U.S. student and reporting period.

#### Definition of U.S. student

To assist foreign graduate medical schools in identifying the appropriate population to include in the calculations required for this information disclosure, it would be helpful if “U.S. student” were clearly defined in the instructions. In most areas, the form references “U.S. students”, but on the first page of the instructions under “Information to Disclose for Prospective U.S. Students”, the instructions refer to “the cohort of American students”, implying that only U.S. citizens should be included in the population for the report.

As an example, 34 CFR 600.55(d)(1)(i) specifies the MCAT score reporting requirement applies to “U.S. citizens, nationals, or eligible permanent residents”. This makes it very clear which students should be accounted for in the report. We recommend updating the instructions for the disclosure form to include a definition of “U.S. student” similar to the one found in this regulation.

#### Reporting period

Throughout the instructions, three distinct reporting periods are mentioned, including: calendar year, academic year, and award year. The use of all three timeframes for the report could cause confusion for the typical consumer. We believe award year should be used as the reporting period for all of the calculations required for completion of this form.”

Regarding the definition of U.S. student, we agree that such a definition will be useful and have revised the instructions to include the following:

The definition of U.S. Student for the purposes of this consumer information collection is in 34 CFR 668.33

(a)(1) “Be a citizen or national of the United States; or”

(2) “Provide evidence from the U.S. Immigration and Naturalization Service that he or she –

- (i) Is a permanent resident of the United States; or
- (ii) Is in the United States for other than a temporary purpose with the intention of becoming a citizen or permanent resident;...”.

Regarding the reporting period, the instructions and form in the 60 day comment period included the incorrect file. The reporting period for this information is calendar year to coordinate with the annual reporting of the U.S. Medical Licensing Examination (USMLE) score requirement. All references to reporting period on the instructions and form now indicate calendar year. I apologize for the earlier error.

The second section commented on the requirement to publish the findings of this report on the institution’s website and noted the similarity to required Gainful Employment requirements.

**Similarity to Gainful Employment reporting requirements**

For-profit institutions are already required by Gainful Employment regulations to calculate and disclose (§668.6(b)) nearly identical student debt and on-time completion information. However, the regulation requires reporting by award year (§668.6(c)(1)), not by calendar year as in the proposed collection. As a result, for-profit institutions would have to calculate and disclose the same basic metrics for two different timeframes. We believe this is an undue burden, but more importantly it will likely cause confusion among consumers, the media, regulatory agencies, and other interested parties. We either recommend that the reporting years for institutions subject to this reporting requirement and the Gainful Employment disclosure requirements be either aligned or that institutions subject to the Gainful Employment disclosure requirements be exempted from the disclosure requirement within this rule.

As I stated, the incorrect form was published with the 60 day notice and there is no requirement for the institution to include this reporting on their website. The information collected by this required reporting will be published by the U.S. Department of Education on the following web page: <http://studentaid.ed.gov/prepare-for-college/choosing-schools/types/international>.

The third section commented on the suggested burden hours for this reporting task.

We believe the burden hours calculated by the Department of Education underestimate the time institutions will devote to performing the calculations and completing the associated form. We estimate that it will take approximately 11 hours per institution to prepare the data and complete the disclosure form.

<b>Task Total Time</b>	<b>(in hours)</b>
Development and running of database queries	4
Initial review of query results and perform calculations	6
Compliance review of proposed submission	6
Development/update of marketing and disclosure materials	16
	<b>Total 32</b>

We agree that the previous burden estimate of 26 minutes per institution identified in the 60 day filing was inadequate. It appears that the total time allotted was for the completion of the form only, not for the gathering and organization of the required data. However, we do not agree that each institution will require 32 hours. As identified above, the instructions and form with the initial information collection filing was the wrong file and included disclosure requirements for the institution. As that is not a requirement of the reporting we are subtracting the proposed 16 hours for disclosure materials. We do agree that the remaining average of 16 hours per institution for the gathering and reporting of data for this reporting requirement is a fair estimate. This change has been reflected in the 30 day filing submitted to the Office of Management and Budget.

We appreciate the time you took to review the instructions and form and to formulate your comments on this information collection. Thank you for sharing your expertise.

Sincerely,

Beth Grebeldinger  
U.S. Department of Education  
Federal Student Aid