

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

ICRAS ICR ID and OMB Number: (1269.16) 1840-0595

Revised 12/03/2013

RIN Number: Not Applicable

12/03/2013 Andrea C. Baird (TSA Program Sponsor) Adjustment to Item 12 per OMB Review

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 section. Please limit pasted text to no longer than 3 pages. 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.

Response: This request is for approval of reporting requirements that are contained in the Federal Family Education Loan Program (FFELP) regulations (34 CFR 682.210) which address the targeted teacher deferment provision of the Higher Education Act of 1965 as amended by the Higher Education Amendment of 1986, sections 427(a)(2)(C)(vi), 428 (b)(1)(M)(vi), and 428 (b)(4)(A), which provide for the targeted teacher deferment.

The FFELP (34 CFR 682.210(q)), TEACH Grant Program (34 CFR 686), and Federal Perkins Loan Program (34 CFR 674.53(c)) regulations contain information collection requirements. The Chief State School Officers (CSSOs) of each State provide the Secretary annually with a list of proposed teacher shortage areas for that State.

If a State does not submit the required written documentation proposing teacher shortage areas, FFEL/SLS and Federal Perkins Loan borrowers and TEACH Grant recipients who teach in the State may not receive Federal program benefits to which they may be entitled.

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.

Response: The information collected is necessary for a State to support its annual request for designation of teacher shortage areas within the State.

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.

Response: State education agencies are encouraged to submit the required annual data and supporting information electronically.

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 Question 2 above.

Response: A single designated agency in each State is responsible for providing the targeted teacher shortage area proposal. There is no duplication of records that the State agencies must maintain.

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.

Response: The information collection has no significant impact on small businesses or the small entities.

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.

Response: Loan borrowers and TEACH grantees will not be able to receive the loan deferment, cancellation/discharge of their loan debt, or meet their teaching obligation if the teacher shortage area information is not collected from the State and designated by the Department.

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.

Response: There are no special circumstances.

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.

Response: We have consulted with the Chief State School Officers and have received their input on the requirements associated with this collection. We will publish the required 60 and 30-day Federal Register Notices seeking public comment.

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

Response: Not applicable. No gifts nor any payments are provided to 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 ICRAS' Part 2 IC form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided. 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). 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.

Response: The information is not of a personal and confidential nature, and no assurance of confidentiality is provided. The purpose of the collection is to designate teacher shortage areas and to distribute that information to loan administrative officials in the State Education Agencies. The information can also benefit (upon request) recent graduates of Schools of Education and trained, experienced teaching professionals aiming to serve school districts with shortage areas that match their certification credentials; and notify Federal financial aid recipients about reducing, deferring, or discharging student loan payments and meet other specified obligations.

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.

Response: There are no questions of a sensitive nature.

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 Question 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. (The table should at minimum include Respondent types, Number of Respondents 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 Question 14.

Response: This information clearance request covers only one form for the annual collection of information to update the Teacher Shortage Nationwide Report - 1840-0595. The form is a letter to each Chief State School Officer (an instructional guideline document), explaining the required annual data and supporting information to submit to U.S. Department of Education by a specific deadline.

There are a total of 57 respondents to this annual information collection. The burden estimate for this information collection is 80.0 hours per respondent. Therefore the total annual burden is calculated as follows:

$$80.0 \text{ hours} \times 57 \text{ respondents} = 4,560 \text{ total hours}$$

The hourly estimate includes identifying and collecting the relevant information, formatting and preparing the report response, securing appropriate signatures, and maintaining records.

The total annual cost burden to respondents is calculated as follows:

Professional Staff (80.0 hours@ \$16.35/hour)-----	\$1,308.00
Estimated annual total cost for computer usage-----	\$55.00
	\$1,363.00

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 Questions 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 Question 12.

Total Annualized Capital/Startup Cost:

Total Annual Costs (O&M):

Total Annualized Costs Requested:

Response: No additional costs to the States (the respondents and recordkeepers) are

involved.

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 Questions 12, 13, and 14 in a single table.

Response: The annual cost to the Federal Government for the State Teacher Shortage Area (TSA) proposals is estimated to be \$15,705. This cost includes staff time in (1) preparing, printing, and mailing the solicitation for proposals; (2) reviewing the submission by the States; (3) recording and analyzing the information and methods used to determine the TSA. This step is necessary to ensure State compliance with the program statute and regulations; and (4) preparation and posting of the updated nationwide listing of TSA on the Office of Postsecondary Education Web pages.

The annual costs to the Federal Government are calculated as follows:

Professional Staff (300 hours x \$44.00/hour)-----	\$13,200.00
Support Staff (100 hours x \$13.00/hour)-----	\$1,300.00
Computer time, Miscellaneous (Printing of documents & mailing)	\$545.00
World Wide Web preparation and posting----- (One Professional Staff x 20 hours x \$33.00/hour)	<u>\$660.00</u>
Total estimated cost to the Federal Government-----	\$15,705.00

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).

Response: There are no program changes or adjustments – no additional information is requested from the respondents to submit to U.S. Department of Education than in prior years.

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.

Response: Results are not intended for statistical use.

Letters to the Chief State School Officers designating Federal teacher shortage areas are assured/insured, with copies distributed to several State contacts. Thereafter, a nationwide list of teacher shortage areas is “published” by the Department as well as posted on the

Department of Education Web site.

17. 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.

Response: The form to be cleared by OMB is an annual letter to CSSOs, requiring them to provide information on teacher shortage areas for the annual TSA Nationwide Report. The responses to each letter is a means (a tool) for the Department of Education to use to develop the annual TSA Report. The Annual TSA Report is the focus of the TSA initiative (rather than the annual “Dear CSSO” letter) and is what is placed on the Department Web site annually, as noted in Responses to Questions 10. and 16.

18. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Response: The expiration date for OMB approval of the information collection will be displayed on the form.

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

Response: There are no exceptions.

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