

**SPECIAL EDUCATION—INSTITUTIONAL REPORTING ON REGULATORY
COMPLIANCE RELATED TO THE PERSONNEL DEVELOPMENT PROGRAM
SERVICE OBLIGATION**

SUPPORTING STATEMENT

INTRODUCTION

This submission is a result of regulations which govern the service obligation related to the Personnel Development Program in Section 673(h) of the Individuals with Disabilities Act (IDEA) Amendments of 1997 which requires individuals who receive a scholarship through personnel development projects funded under the Act subsequently to provide early intervention, special education or related services to children with disabilities or, for leadership personnel, work in the appropriate field for a period of two years for every year for which assistance was received. Scholarship recipients who do not satisfy their service obligation through service must repay all or part of the cost of their assistance in accordance with the regulations issued by the Secretary. These regulations implement requirements governing, among other things, the service obligation for scholars, oversight by grantees, repayment of scholarships, and procedures for obtaining deferrals or exemptions from service or repayment obligations. In order for the Federal government to implement these regulations, certain data collections, record keeping and reporting are necessary.

JUSTIFICATION

A1. Circumstances Making the Collection of Information Necessary

The December 9, 1999 regulations require the institutions of higher education (IHEs) grantees to document scholars' progress in programs and in their subsequent eligible employment. When scholars do not satisfy the requirements of the regulation and are required to repay part or all of their scholarship, IHEs are required to provide the Federal government with the information necessary to carryout the Secretary's functions. This Paperwork Act submission relates to grants that were awarded in FY2004 and earlier.

The Individuals with Disability Education Act (IDEA) of 2004 transferred documentation of scholars' eligible employment from IHEs to the Federal government. A separate Paperwork Act submission (1820-0686 expiring 8/31/14) was approved on June 5, 2006 for data collected in FY2005 and later.

A2. Purpose and Use of the Information

The information gathered by this collection is used to ensure repayment by obligees to the Federal government of all or part of the scholarship assistance made to those scholars who received scholarships from personnel development grants awarded in

2004 and earlier but who do not complete programs or satisfy the service obligation through service as required by the regulations.

A3. Use of Technology to Reduce Burden

Grantees establish their data collection systems, and these systems vary from institution to institution, including the degree to which they use technology. The grantees send via US mail the necessary information about scholars (approximately 30 each year) who will be required to repay their scholarships to the Department. Grantees will continue to send via US mail information related to students who have not completed their program of study or who have not completed their service obligation.

A4. Efforts to Identify Duplication

Nothing in the regulations duplicates other information requests or requirements. The requested information is not available from other sources.

A5. Methods to Minimize Burden on Small Entities

The information requested does not involve the collection of information from small businesses.

A6. Consequences of Not Collecting Data

The regulations require the minimum amount of data to ensure that IHEs and obligees provide the information necessary to meet the purpose of the Act. To require less frequent collection would result in the inability of the Secretary to assure that grantees and obligees are complying with the statutory requirements.

A7. Special Circumstances

Scholarship recipients are required to maintain their employment records until they have satisfied their service obligation as required by IDEA 1997 and 2004.

A8. Federal Register Comments and Persons Consulted Outside the Agency

Since the last Paperwork Act submission, no unfavorable comments about the burden of this requirement have been documented. The Department published a 60- and 30-day Federal Register Notice with no public comments received during the 60-day comment period.

A9. Payments or Gifts

No payments or gifts will be provided to respondents. The grants from FY2004 and earlier have ended.

A10. Assurances of Confidentiality

No assurance of confidentiality is provided to respondents.

A11. Justification of Sensitive Questions

There are no questions of a sensitive nature contained in the application form.

A12. Estimates of Hourly Burden

All of the FY2004 and earlier grants have closed. Therefore, grantees will no longer establish Pre-scholarship Agreements or Exit Certifications with scholars/obligees.

It is estimated that 120 grantees will spend one hour each year collecting and documenting obligee employment data for an average of 20 obligees each. Grantees must report to the Secretary any obligees who must repay part or all of the funding received, because they have not completed their obligation through service. The burden for all grantees for each of the next 3 years equals an estimated 2,400 hours.

This burden has decreased because grantees are no longer establishing Pre-scholarship Agreements or Exit Certifications. As more scholars complete their service obligations or repay all or part of the funding received, the burden for grantees will continue to decrease.

It is estimated that 2,400 individual scholarship recipients will take 30 minutes each year to report to the grantee the information necessary for the grantee to maintain scholars' eligible employment records. The total average annual burden for all scholars during the next three years is 1,200 hours. An estimated half of the time is focused on recordkeeping and the other half on reporting to grantees. As scholars complete their service obligations and no longer need to provide the grantee with information, the burden for scholars will decrease.

Thus, the total annual reporting burden for this collection is estimated at 2,400 hours annually for all grantees and 1,200 hours annually for all scholars totaling 3,600 burden hours.

The estimated cost to grantees of maintaining obligee information and providing information to scholars and the Secretary is \$60,000. This annual cost is determined by multiplying the annual grantee burden hours (2,400) by the average hourly salary (\$25). Therefore, the estimated average cost for each grantee is \$500.

Grantee Burden

Reporting Total	Number of Grantees	Avg. Number of Obligees per Grantee	Total Number of Grantee Burden Hours
1 hour	120	20	2,400

Obligee Burden

Time Each Grantee Spends Recording	Time Each Grantee Spends Reporting	Reporting and Recording Subtotal	Number of Obligees	Total Obligee Burden Hours
15 minutes	15 minutes	30 minutes	2,400	1,200
Total Burden				3,600

A13. Estimates of Cost Burden to Respondents

There are no additional costs other than the burden identified in A12.

A14. Estimate of annual Cost to the Federal Government

The following outlines the cost to the Federal Government:

Based on current experience, it is estimated that there will be approximately 30 obligees each year that will be referred to the Department for collection when an obligee fails to meet the requirements of the regulations and must repay all or part of the scholarship received. It is estimated that it will take 55 hours of staff time to resolve each of 30 cases for a total of 1,650 hours. Therefore, the estimated cost burden to the Federal government is 30 cases x 55 hours x the average hourly pay rate of \$40. The total annual cost burden is \$66,000.

A15. Program Changes or Adjustments

There is a -3150 program change annual burden hour decrease for grantees. This burden has decreased because grantees are no longer establishing Pre-scholarship Agreements or Exit Certifications. As more scholars complete their service obligations or repay all or part of the funding received, the burden for grantees will continue to decrease. There is a decrease of -2130 scholars, as scholars complete their service obligations and no longer need to provide the grantee with information, the burden for scholars will continue to decrease.

A16. Plans for Tabulation and Publication of Results

The information collected will not be published.

A17. Approval to Not Display the OMB Expiration Date

There is no request for permission not to display the expiration date for OMB approval.

A18. Explanation of Exceptions

The information collection will not need an exception to the certification statement in OMB Form 83-1.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methods.