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Special Education - Individual Reporting on
Regulatory Compliance Related to the Personnel Development Program
Service Obligation and the Government Performance and Results Act
(GPRA)

Supporting Statement

*Office of Management and Budget
Clearance Package Supporting Statement
And Data Collection Instrument*

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SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

INTRODUCTION

In the Individuals with Disabilities Education Act of 2004 (IDEA), Congress stated that “the education of children with disabilities can be made more effective by... supporting high-quality, intensive preservice preparation and professional development for all personnel who work with children with disabilities in order to ensure that such personnel have the skills and knowledge necessary to improve the academic achievement and functional performance of children with disabilities” (section 601(a)(5)(E)). To meet this need, the Office of Special Education Program's (OSEP) Personnel Development to Improve Services and Results for Children with Disabilities (CFDA No. 84.325) funds one of the largest personnel development grant programs in the U.S. Department of Education (ED).

The objectives of the Personnel Development Program (PDP) are to: a) Improve the curricula of IDEA training programs to ensure that personnel preparing to serve children with disabilities are knowledgeable and skilled in practices that reflect the current knowledge base; b) Increase the supply of teachers and service providers who are highly qualified for and effectively serve in positions for which they are trained; and c) Enhance the efficiency of the expenditure of Federal dollars under this program.

The proposed data collection serves three purposes. First, data from three sources (grantees, scholars/obligees, and employers) are necessary to assess the performance of the PDP on its Government Performance Results Act (GPRA) measures (see Section A2, below). Second, data from all three sources are necessary to determine if scholars/obligees comply with the service obligation requirements. And finally, project-specific performance data are collected from PDP grantees for project monitoring and program improvement.

The proposed forms in this package are updates to existing Office of Management and Budget (OMB) approved forms (1820-0686): a) Scholar/Obligee Record Form; b) the Scholar/Obligee Employment Record Form; c) the Employment Verification Form; and d) the Pre-Scholarship Agreement and Exit Certification Forms.

A. JUSTIFICATION

A1. Circumstances Making the Collection of Information Necessary

In order to ensure that OSEP is meeting the needs of children with disabilities and their families, OSEP needs to collect data on the results of its grant awards. These data includes the number and characteristics (e.g., minority status, related professional

experience) of professionals trained and the program outcomes (e.g., program completion, certification, employment in area supported by training). In addition, section 662 of IDEA requires OSEP to collect data to confirm that scholars who receive funding under this program complete their service obligation requirements. ED is responsible for collecting the necessary information, verifying the completion of the service obligation, and referring scholars to the Debt and Payment Management Group for repayment, if necessary.

These data are used to assess program effectiveness and efficiency, and to meet the reporting requirements of the Government Performance and Results Act (GPRA). The data will provide information on the supply of the OSEP-funded projects nationally, within each state, and within and across personnel categories, including special educators certified to teach children with disabilities, university faculty, related-service personnel, preschool service providers, paraprofessionals, administrators and other personnel (see Section 2A, below).

To collect the needed data, OSEP is creating a merged data collection system, the Personnel Development Program Data Collection System (DCS), that will combine all data previously collected by the two, separate systems. OSEP will reduce burden on its PDP grantees, scholars/obligees, and employers by merging the two existing data collections: a) 1820-0686, Special Education - Individual Reporting On Regulatory Compliance Related To the Personnel Development Program's Service Obligation and the Government Performance Results Act (GPRA) which expires in 8/31/2014; and b) 1820-0530, Performance Report: Personnel Development for the Individuals with Disabilities Education Act (IDEA) which expires in 1/31/2014. This effort will eliminate item duplication across the two separate collections, use one website for data collection rather than two, and provide users a single resource for information related to PDP data collection.

In addition, OSEP is revising its data collection instruments to collect data for three additional measures requested by OMB:

- 1) The number and percentage of degree/certification recipients who are employed in high-need schools;
- 2) The number and percentage of degree/certification recipients who are employed in a school for at least three years; and
- 3) The number and percentage of degree/certification recipients who receive a positive evaluation from their employer.

In combining the two data collections, OSEP made the following changes:

- 1) We added one additional item to the Employer Verification Form (1820-0686) to collect data for an OMB requested performance measure on the number and percentage of degree/certification recipients who receive a positive evaluation from their employer (Item #8).

- 2) We clarified two items on the Employer Verification Form to better align with the Service Obligation Regulations (Items #5 and #6).
- 3) We inserted the items from Sections A, B, C, D, and E from the Scholar Data Report (SDR) (1820-0530) into the Scholar/Obligee Record Form (1820-0686). We eliminated duplicate items concerning the scholar's demographic information, educational history, and current training information. Section F of the SDR is no longer required as this data will be collected directly from the scholar through the Scholar/Obligee Employment Information Form.
- 4) We added an option, in Section I. Scholar Status of the Scholar/Obligee Record Form, to indicate when the grant ends and the scholar has not yet completed the program, if the scholar continues enrollment and will complete the program through another OSEP-funded preparation grant.
- 5) Prior to our submission to OMB for 1820-0686 in 2011, grantees developed their own Service Obligation Agreement and Exit Certification forms in which the content varied widely. ED has found that some grantees did not develop forms or provided inaccurate or vague information to their scholars. Many grantees have requested ED to provide standardized forms that include all the relevant information related to the service obligation. Since the 2011 forms were approved, OSEP has determined that revisions are necessary to ensure that: a) scholars understand the conditions of their scholarships, and b) when scholars exit or complete their program, they certify on the Exit Certification Form that the grantee has provided them with accurate information about the length of their service obligation and the amount that they owe, if they do not complete their obligation through service. This should provide accurate information to scholars, grantees and ED. The revised Pre-Scholarship Agreement and Exit Certification Forms are submitted for OMB approval with this information package.
- 6) Finally, the Pre-Scholarship Agreement and the Exit Certification Forms need to be submitted directly into the web-based, service obligation database for two reasons: a) ED will be assured that grantees are following requirements; and b) during 2012, the Debt and Payment Management Group began requesting copies of these documents when scholars/obligees were referred to them for repayment.

In summary, because OSEP is updating its data collection to be more efficient for use by grantees and is requesting only additional information on a small subset of scholars, OSEP will be able to more accurately and efficiently respond to reporting requirements for GPRA and OMB, while significantly decreasing burden for grantees.

Authorization for Collection

This data collection is authorized by the following Public Laws:

The information is being collected under the authority of the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. 1462) and the implementing service obligation regulations at 34 CFR Part 304, as well as with the Government Performance and Results Act of 1993 (GPRA), section 4. In particular, these sections authorize this collection:

1) The service obligation requirement of the Personnel Development Program can be found in IDEA, Public Law 108-446, section 662(h)(1) which states that “Each application for assistance...shall include an assurance that the eligible entity will ensure that scholars who receive a scholarship under the proposed project agree to subsequently provide special education and related services to children with disabilities, or in the case of leadership personnel to subsequently work in the appropriate field, for a period of two years for every year which the scholarship was received or repay all or part of the amount of the scholarship, in accordance with regulations issued by the Secretary. Section 662(h)(3) “Secretary’s responsibility.—The Secretary—(A) shall ensure that individuals described in paragraph (1) comply with the requirements of that paragraph.”

- a) For scholarships made from grants made in fiscal year (FY) 2006 and every year thereafter, 34 CFR 304.23 through 304.30, which implements section 662(h) of IDEA for those fiscal years; and
- b) For scholarships made from FY 2005 grants, the notice published in the Federal Register on March 25, 2005 (70 FR 15306), which implements section 662(h) of IDEA for that fiscal year.

2) Public Law 108-446, section 662(a) (20 U.S.C. 1462) “The Secretary shall, on a competitive basis, make grants to, or enter into contracts or cooperative agreements with, eligible entities...to help address the needs identified in the State plan...for highly qualified personnel...to work with infants or toddlers with disabilities, or children with disabilities.”

3) Public Law 108-446, section 682(c) (20 U.S.C. 1482) “The Secretary may use funds made available to carry out subpart 2 or 3 to evaluate activities carried out under subpart 2 or 3, respectively.”

4) Education Department General Administrative Regulations (EDGAR) require that grantees cooperate in any evaluation of the program by the Secretary (EDGAR, section 75.591) (20 U.S.C. 1221e-3 and 3474).

A2. Purposes and Uses of the Data

There are three primary purposes for the data that are being collected. The first use is to fulfill Government Performance and Results Act (GPRA) reporting requirements. GPRA requires that Federally-funded agencies develop and implement an accountability system based on performance measurement. Grantees are required to report on their progress toward meeting the objectives and goals established for each ED grant program. However, OSEP needs data directly from scholars/obligees and their employers in

addition to grantee data for GPRA reporting. OSEP uses performance measure data in its annual budget justification.

The second use of the data is to fulfill the requirements of IDEA 2004 and the corresponding regulations (Service Obligations Under Special Education – Personnel Development to Improve Services and Results for Children with Disabilities 2006) to verify the fulfillment of the service obligations of scholars who receive scholarships from Institutions of Higher Education (IHEs) under OSEP’s Personnel Development to Improve Services and Results for Children with Disabilities program. These requirements include IHE, scholar and employer input as well as referral of scholars to Debt and Payment Management Group for repayment of part or all of the scholarship received, if they are not fulfilling their obligations through service.

Finally, the data collected are used by OSEP for project monitoring and program improvement, and to provide information on the characteristics of teachers and other personnel supported in these preparation programs and the outcomes of the grants (program completion, certification, employment in the area supported by training, etc.). Collection of these data is critical in assessing accountability for the grant program. These data, submitted annually, also serve as the primary source of information for OSEP to target program areas in need of improvement.

A3. Use of Technology to Reduce Burden

OSEP will collect all data in a web-based data collection system which is maintained on a secured server. Grantees and scholars/obligees will be given usernames and passwords to enter data. Employers will be provided secure links to review and verify employment. The system is designed to minimize burden on respondents by programmatically skipping inapplicable items and storing and displaying data previously entered. For many items, users will simply review data previously entered and verify its continued accuracy. The data collection instruments and frequently asked questions will be available online to respondents.

A4. Efforts to Identify Duplication

There will be no duplication of reporting efforts. The information requested for this reporting is not collected or reported elsewhere. Data to determine whether a school is “high-need” will not be collected from any respondents to reduce burden. This demographic data will be gathered from ED’s Common Core of Data by the contractor. Determining a “high-need” school is necessary to calculate the OMB requested performance measure on the number and percentage of degree/certification recipients who are employed in high-need schools.

A5. Methods to Minimize Burden on Small Entities

The information requested rarely involves the collection of information from small businesses. There may be some employers classified as small businesses; however, the

Employment Verification Form was designed to solicit only the information necessary to respond to program and GPRA requirements. Thus, the burden of reporting is minimized to only those elements necessary to meet Federal requirements for budget and program activity data. In addition, this system utilizes a secure online tracking system which will allow employers to easily review information already entered by the scholar and then submit verification or provide revisions.

A6. Consequences of Not Collecting Data

Obligee follow-up is necessary for the program office to monitor service obligation requirements. To require less frequent data collection would result in the inability of the Secretary to assure that grantees, scholars and obligees are complying with the statutory requirements. In addition, these data are needed annually so that OSEP can meet its PDP annual program performance measure reporting requirements under GPRA.

A7. Special Circumstances

There are no special circumstances that would require the collection to be conducted in a manner inconsistent with OMB guidelines.

A8. Federal Register Comments and Persons Consulted Outside the Agency

Information Collection 1820-0686 was placed in the Federal Register for a 60-and 3- day comment period. We did not receive any public comments during the 60-day comment period.

The original system of record notice, The Special Education—Individual Reporting on Regulatory Compliance Related to the Personnel Development Program’s Service Obligation and the Government Performance and Results Act of 1993 (GPRA), SORN 18-16-04, 73 FR 63453-63457, was published in the Federal Register on October 24, 2008.

OSEP provides training on data collection quality at least annually to grantees who receive funds under Personnel Development to Improve Services and Results for Children with Disabilities, CFDA No. 84.325. . In addition, suggestions from grantees and scholars provided to OSEP and its contractors over the past four years were used to clarify questions and response options on the survey instrument.

A9. Payments or Gifts

There are no payments or gifts to respondents in support of the data collection.

A10. Assurances of Confidentiality

All data collection activities will be conducted in full compliance with ED regulations. Data collection activities will be conducted in compliance with The Privacy Act of 1974,

P.L. 93-579, 5 USC 552 a. The Privacy Impact Assessment (PIA) for The Special Education—Individual Reporting on Regulatory Compliance Related to the Personnel Development Program’s Service Obligation and the Government Performance and Results Act of 1993 (GPRA), was published on March 21, 2011. In accordance with the Privacy Act of 1974, a system of records (SORN) titled Special Education--Individual Reporting on Regulatory Compliance Related to the Personnel Development Program's Service Obligation and the Government Performance and Results Act of 1993 (GPRA)" (18-16-04) was published on October 24, 2008.

Project staff and contractors will adhere to the regulations and laws regarding the confidentiality of individually identifiable information.

A11. Justification of Sensitive Questions

Questions regarding Social Security Number (SSN), employment status, and service obligation status may be considered sensitive. However, SSN, employment and service obligation status questions are necessary to directly respond to GPRA measures and program requirements for service obligation. In addition, the Debt and Payment Management Group and the Department of Treasury require SSNs when scholars/obligees are referred because they did not repay their service obligation through eligible employment and must, therefore, repay part or all of the funding they have received.

Race/ethnicity data are also collected in this performance report. The IDEA 2004 emphasizes that the training of professionals in the area of special education by minority individuals is essential if the nation is to obtain greater success in the education of minority children with disabilities (Section 601(10)(D)). Collecting these data will assist in analyzing and increasing the number of minorities trained in special education.

A12. Estimates of Hour Burden

Three different sources—the grantees, scholars/obligees and employers—will be asked to report or verify information about the scholar/obligee. The time taken by a scholar/obligee to complete the Scholar/Obligee Training and Employment Information Form will vary based on the individual’s employment. The approximate time required for grantees to complete the Scholar/Obligee Record Form and for employers to complete the Employer Verification Form will not vary widely. For all respondents, much of the information in these forms are pre-populated and require only verification.

Initially, grantees developed individual Service Obligation Agreement and Exit Certification forms that have varied widely in terms of quality. Many grantees have requested that ED provide standardized forms that included all the relevant information related to the service obligation. Therefore, ED developed a standard Service Obligation Pre-Scholarship Agreement Form for grantees and scholars to complete and sign prior to offering a scholarship to a scholar and an Exit Certification Form for the grantee to complete, and the scholar to verify and sign, when the scholar exits or completes the

program. The standardized form was submitted and approved by OMB in 2011. Subsequently, we have determined a need to include additional information to ensure scholars understand their service obligation responsibility. The revised forms are submitted with this package.

Table A-1 presents the **maximum** annual burden estimates at 14,761 hours for grantees, scholars/obligees, and employers. The program office estimates that 638 grantees, 14,212 scholars/obligees, and 14,212 employers will respond to this collection. Given that scholars/obligees and employers are only required to respond once a scholar/obligee has completed or exited a grant training program, it is possible that not all scholars/obligees/employers in the counts below will respond in any given year; however, for the purposes of estimating burden, we present the maximum burden estimate by assuming that all of the 14,212 scholars/obligees will be contacted annually, and all scholars/obligees will be employed. The actual number of grantees, scholars/obligees and employers may vary due to the availability of Federal appropriations, number of grant awards made, and the number of scholars recruited by each project. This is our best estimate taking these variables into consideration.

For burden estimates, we assume that grantee administrators and employer representatives have an hourly rate of \$50. We assume an average hourly rate of \$24.69 for obligees, understanding that some obligees may be earning more as administrators, and some may be earning less as teachers or while in deferment. Given these rates and the hour estimates above, the maximum estimated annual burden is \$585,053 across all grantees, obligees, and employer representatives. Below we describe how these estimates were derived for each instrument.

IHEs: Scholar/Obligee Record Form

We estimate that 638 grantees will respond to this data collection instrument annually. To date, there are currently 587 grantees in the database. Based on awards made during FY 2012, we anticipate adding another 51 grantees this summer.

The burden for grantees of completing the IHE Scholar/Obligee Record form is estimated at 8 hours per grantee per year. This estimate includes an average of 25 minutes per scholar/obligee the grantee will spend entering and updating information each year. Using actual data from previous collections, OSEP has estimated that each grant would need to update data annually on 20 scholars. The estimate of 20 scholars is based on enrollment data collected from grantees over the past 10 years.

IHEs: Pre-Scholarship Agreement

The Pre-Scholarship Agreement is completed only once per scholar per grant. These agreements are signed at the time the scholar enrolls in the grant-supported training. We anticipate that the grant project directors are presenting information about their programs and explaining the agreement during their program orientations. Therefore, we expect project directors to conduct these sessions in groups rather than individually. These

sessions are estimated to take 30 minutes to ensure scholars are well informed about the nature of the agreement.

Our estimate is based on the assumption that grantees will meet with scholars in groups of five to explain the agreement, answer questions, and submit the form. Because the agreement is only submitted prior to the start of training, grantees will primarily be conducting this activity in the first and second years of their grant. We estimated that 120 grants would need to conduct this activity annually with an average of 28 scholars per grant, or approximately 6 times. Our estimate is based on roughly 50 to 60 grant awards being made in each FY.

IHEs: Exit Certification

The Exit Certification is completed only once per scholar per grant. The exit certifications are signed and issued when a scholar completes the grant training program or exits prior to completion. We anticipate that grant project directors are completing these agreements one-on-one with the scholars and that it will take approximately 15 minutes to review the agreement and submit.

Using data from our previous collections, we estimate that approximately 418 grants will need to complete at least one exit certificate annually. There are currently 418 active grants that have enrolled scholars who will eventually exit. Again, because we wanted to report the maximum burden, we averaged the number of completers per grant over the last five years. The estimates in the table are based on each grant needing to complete exit agreements for eight scholars.

Scholars: Scholar/Obligee Training and Employment Information Form

For scholars/obligees, follow up begins when the scholar/obligee completes or exits the program prior to completion. Some scholars elect to begin fulfilling their service obligation through eligible employment after they have completed one full-time academic year of the program but while still enrolled in their programs. The number of obligees entering data in any given project year will vary but may be as many as 14,212 scholars/obligees across all grants. There are currently 10,829 scholars in the database, and we anticipate another 3,383 being added in the next year. This number reflects the average number of new scholars added to the system over the last five years. We anticipate that obligee burden for follow up will average 15 minutes per year.

Scholars: Pre-Scholarship Agreement

As noted above under the IHE: Pre-Scholarship Agreement, the Pre-Scholarship Agreement is completed only once per scholar per grant. Each scholar will participate in an information session with his/her project director to discuss and complete the agreement. We estimate that these sessions will last roughly 30 minutes. These agreements are completed when the scholars begin their programs, so we averaged the

number of new scholars from FY 2006 – FY 2010 to obtain our estimate of the annual number of scholars who would need to complete these agreements.

Scholars: Exit Certification

As noted above under the IHE: Exit Certification, the Exit Certification is completed only once per scholar per grant. Each scholar will meet with his/her project director at the time he/she completes the program or leaves prior to completion. We estimate that it will take 15 minutes for each scholar to review, discuss, and sign the Exit Certifications. To calculate the annual number of scholars who would need to complete the exit certifications, we averaged the number of scholars who completed or exited prior to completed from FY 2006- FY 2010.

Employer representatives: Employment Verification Form

For employers, the obligee will initiate employment verification annually; however, some obligees: a) will exercise their allowable grace period; b) do not stay employed in education; or c) enter deferment due to an approved reason. Therefore, the number of employer representatives asked to provide verification may be lower than the number of obligees that exited the PDP training grants. We anticipate the employer representative burden to be 10 minutes per obligee per year.

Table A-1. Maximum Annual Burden Estimates, by Data Source

Data Source (Frequency)	Estimated Number of Respondents	Estimated Annual Burden per Respondent (in Hours)	Estimated Annual Burden (in Hours)	Estimated Total Annual Cost (in Dollars)
IHEs: Scholar/Obligee Record Form (Annual)	638 grantees	8	5,104	\$255,200 ¹
IHEs: Pre- Scholarship Agreement (Once per scholar/grant; conducted in groups of five scholars)	120 (28 enrolled/yr)	3	360	\$18,000 ¹
IHEs: Exit Certification (Once per obligee/grant)	418 (8 completers/yr)	2	836	\$41,800 ¹
Scholars: Scholar/Obligee Training and	14,212 scholars/obligees	0.25	3,553	\$87,724 ²

Employment Information Form (Annual)				
Employer representatives: Employment Verification Form(Annual)	14,212 employers ³	0.17	2,416	\$120,802 ¹
Totals	29,600	14.17	12,269	\$585,053

¹Based on an estimated hourly rate of \$50 for grantee administrators and principals/LEA representatives.

²Based on an estimated average hourly rate of \$24.69 for scholars/obligees.

³Assumes that all scholars/obligees are employed

A13. Estimate of Cost Burden to Respondents

We do not anticipate additional costs to respondents resulting from this collection other than that already reported in A12, including capital or start-up costs, or operation, maintenance, or purchase of services. It is assumed that all respondents will have access to a computer either through the grantee Institution of Higher Education or their place of employment. The data collection contractor maintains a toll-free Help Desk number to allow respondents reliable access to support services. This Help Desk could assist a respondent without reliable access to a computer. Some respondents, depending on the technology used, may bear some cost of the communication (e.g., cell phone or email service costs); however, it is not possible to identify a specific cost given the range in service options.

A14. Estimate of Annual Cost to the Federal Government

The total annual cost to the Federal government reflects the combined costs for OSEP to contract the data collection and reporting tasks and provide management and oversight of that contract (see Table A-2 below).

Table A-2. Total Annual Cost to Federal Government by Type of Cost

Type of Cost	Cost
OSEP Staff (salaries)	\$130,400
Contractor Data and Reporting Services (Fixed price)	\$929,889
Total	\$ 1,060,289

OSEP has secured a fixed price contract with EPI and Westat to create and manage the online data collection system. The annual fixed cost for this contract is \$929,889 for the base year These costs include the development of the system, support for respondents,

and preparation of reports. The majority of communications with respondents will be electronic; however, scholars/obligees who do not respond to electronic or telephone communications will be sent follow-up letters. The costs for those mailings are included in the contract.

The PDP program office maintains a program specialist (.5 FTE) whose function is to manage the contract and 18 tasks. This program position is a GS-14, which, in 2013, ranges from \$105,211 to \$136,771 in annual salary for the Washington D.C. locality. OSEP staff salaries also include the estimated cost of an additional person assigned to support the contract.

A15. Program Changes or Adjustments

There is a program change decrease; this request is for an updated data collection as a result of combining two existing data collections. The proposed burden estimate reflects a reduction in overall burden for all respondents. For the grantees, the burden is reduced because any duplicated data collection efforts are eliminated, and grantees must enter data into only one system. The burden estimate for the scholars/obligees and employers is also lower. We believe the numbers provided in this report reflect a more accurate estimate than the current 1820-0686, as we have utilized existing data in our calculations. By merging the data collection systems and combining the two existing data collections, OSEP has reduced the maximum, total burden hours by 17,759 hours (see Table A-3, below).

Table A-3. Adjustment Decrease in Burden Hours from the Prior Data Collections

Total Burden Hours	OMB Form #
14,761	Proposed 1820-0686
3,645	1820-0530
30,029	1820-0686
18,913	# Burden Hours Decrease

A16. Plans for Tabulation and Publication of Results

The data will also be used on an annual basis to report results to ED's Budget Service for compliance with GPRA and publication in ED's Budget Justification. A final report will be produced for each fiscal year. This report will include descriptive analyses of all variables collected. The number of scholars and percentages, as well as measures of central tendency when appropriate, will be presented by grant type in table format. The report will also provide data to monitor the fulfillment of obligee service obligation and grantee and scholar/obligee compliance with the program regulations. Bulleted text and an executive summary will be provided to highlight key findings. The final report will also include analyses of relationships among variables in the current fiscal year data set

as well as comparative analyses of key variables across all data sets. All data will be in an aggregate form to protect PII and no PII information will be published.

Table A-4 below summarizes the data collection and reporting timeline. Respondents will have continuous access to the online data collection system; however, analyses will be conducted on a snapshot of the data to document the previous fiscal year.

Table A-4. Data Collection and Reporting Timeline

Task	Month(s)
Respondents enter data	Ongoing
Snapshot taken of data	April
Draft reports for previous FY	June-July
GPRA reporting for previous FY	July-August
Final report for previous FY	August

A17. Approval to Not Display the OMB Expiration Date

This item is not applicable as the OMB expiration date will be displayed on the form and the login screen for each respondent type.

A18. Explanation of Exceptions

There are no exceptions to the certification statement.

SECTION B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

B.1 Collection of Information Employing Statistical Methods

This collection does not use statistical methods due to the three purposes of the proposed data collection. First, data from three sources (grantees, scholars/obligees, employers) are necessary to assess the performance of the PDP program on its Government Performance Results Act (GPRA) measures. Second, data from all three sources are necessary to determine if PDP obligees are fulfilling the terms of their service obligation requirements. Finally, budget and project-specific performance data are collected from PDP grantees for project monitoring. These three purposes require actual data collection to ensure accuracy, integrity, and the validity of aggregate data.