

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
TEACH Grant Data Collection Tool

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.

Section 420P of the Higher Education Act, as amended by the Higher Education Opportunity Act of 2008, requires the Secretary of Education to submit a report to Congress every two years with respect to schools and students served by schools that participate in the Teacher Education Assistance for Higher Education (TEACH) Grant Program. The report must take into consideration information related to: (1) the number of TEACH grant recipients; (2) the degrees obtained by such recipients; (3) the location, including the school, local educational agency, and State, where the recipients completed the service agreed to under section 420N and the subject taught; (4) the duration of such service; and (5) any other data necessary to conduct such evaluation. The Department has determined that the inclusion of data on a student's eligible field of study and cost of education is necessary to better inform the evaluation.

Elements 1-4 of the report are based on data collected by Federal Student Aid (FSA) through the National Student Loan Data System (NSLDS), the Application Processing System, and the Common Origination and Disbursement (COD) System.

Under element 6, data on eligible field of study and cost of education has been determined to be additional information necessary to report to the Secretary. These data are collected from each school that participates in the TEACH Grant Program using a separate data collection tool. It is this separate data collection tool that is the focus of this information collection request.

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

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 Department uses the information collected to prepare a Congressionally-mandated report on TEACH grants with respect to the schools and students served by recipients of such grants. The data collected on a student's eligible field of study and cost of education will be combined with data already collected by FSA to compile this report for Congress.

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.

In order to minimize response burden, a data collection tool used to collect a student's eligible field of study and cost of education was developed and placed on the OPE website, as approved OMB Control Number 1840-0819, to collect data for TEACH grant funds that were dispersed during the 2012-13 award year. The language on that data collection tool will be updated in order to collect those same data for TEACH grant funds that are dispersed during the 2013-14 award year.

Features of the electronic data collection tool include:

- The Financial Aid Administrator (FAA) of schools where TEACH grants are dispersed will access the data collection tool electronically through a secure website, using authorized login and password. The link to the data collection tool, login, and password will be sent to the FAA via email.
- Once logged into the data tool, the FAA will enter two data points. One data point will be the eligible field of study defined by a Classification of Instructional Programs (CIP code) which will be limited through the use of drop down menus from which the FAA will choose. The other data point, the cost of education, will be a dollar value amount for the cost of education for each student who is obtaining a TEACH grant. The system will generate an error message indicating the need for correction if anything other than numbers are entered for the education costs.

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.

This information does not duplicate any other information collection effort. No other system collects CIP codes and the cost of education specific to the TEACH Grant program. The information is not available in other forms or as the result of other

information collections.

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.

Small businesses or other small entities are not part of the target population of the information 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.

Section 420P of the HEA requires this data collection. The Secretary — and the states and institutions required to report — would be out of compliance with the law if the information were not collected and reported in a timely manner.

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.

There are no special circumstances that would require this information collection to be conducted in any of the ways listed as part of this question.

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 Department of Education is seeking the applicable 60 and 30 day notices requesting public comment.

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

No payment or gift will be provided to respondents in connection with this data collection.

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

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

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.

No assurances of confidentiality are provided. A link to the U.S. Department of Education's Privacy Policy is provided on the log in page of the data collection tool (<http://www2.ed.gov/notices/privacy/index.html>).

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 data collection includes 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 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

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)

activities should not be included here. Instead, this cost should be included in Item 14.

This is a reporting requirement. The time required to complete this information collection is estimated to average 1 hour per institutional response, including the time to review instructions, search existing data sources, gather data needed, and complete and review the information collection. In total, 796 institutions will be contacted in regards to this data collection. This is a one-time collection and will not be repeated by OPE.

796 Institutions X 1 hour per institution = 796 Total Burden Hours for collection

	# of Respondents	# of Responses	Hours/Response	Burden Hours
Proprietary Institutions	438	438	1 hour	438
Not-for-Profit Institutions	11	11	1 hour	11
Public	346	346	1 hour	346
Total	796	796		796
Current Burden	488	488		488
Increase in Burden	308	308		308

As there are only two fields of data that the institutions already collect and a limited number of TEACH grant recipients at each institution, we do not feel there will be a cost burden associated with the collection.

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 :
Total Annual Costs (O&M) :

Total Annualized Costs Requested : _____

There are no start-up costs for respondents.

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 annualized cost to the Federal government will be approximately \$80,398. This amount was calculated based on the number of hours it would take to collect and aggregate data collected through the system.

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).

We are requesting an extension to continue this collection of data. The burden of 796 total hours for 796 institutions is a revision to the current burden. This is an increase of 308 hours resulting from additional institutions having to report data to meet the legislative requirement in section 420P of the Higher Education Opportunity Act.

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 Secretary of Education must submit a report to the Congress. That report will be based on data collected by Federal Student Aid (FSA) through the National Student Loan Data System (NSLDS), the Application Processing System, and the Common Origination and Disbursement (COD) System. The data collected by the Office of Postsecondary Education from each school that participates in the TEACH Grant Program will be included in the report to Congress.

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.

We do not seek this approval.

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

There are no exceptions to the statement, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-1.