

SUPPORTING STATEMENT

Information Collection for the Teacher Education Assistance for College and Higher Education Grant Program (TEACH Grant Program)

TEACH Grant Program Agreement to Serve (OMB No. 1845-0083)

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 copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The College Cost Reduction and Access Act (Public Law 110-84) (the CCRAA) established the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program under Part A of the Higher Education Act of 1965, as amended (the HEA). The TEACH Grant Program provides grants of up to \$4,000 per year to undergraduate and graduate students who are completing, or who intend to complete, coursework necessary to begin a career in teaching.

In exchange for receiving a TEACH Grant, a student must agree to serve for at least four years as a full-time, highly-qualified teacher in a low-income school or educational service agency, in a high-need subject area. If the grant recipient does not complete the required teaching service within eight years of completing the program for which a TEACH Grant was received, or otherwise does not meet the requirements of the TEACH Grant Program, all TEACH Grant funds that were awarded will be converted to a Federal Direct Unsubsidized Stafford/Ford Loan (Direct Unsubsidized Loan) that the grant recipient must repay in full to the U.S. Department of Education (the Department), with interest charged from the date of each TEACH Grant disbursement. The regulations governing the TEACH Grant Program are in 34 CFR 686.

The Agreement to Serve (ATS) included with this submission is required by Section 420N(b) of the HEA and 34 CFR 686.12. An applicant for a TEACH Grant must complete an ATS stating that the applicant will meet the teaching service requirements of the TEACH Grant Program, and that if the applicant does not complete the required teaching service or otherwise does not comply with the terms of the TEACH Grant Program, the applicant must repay the full amount of all TEACH Grant funds received as a Direct Unsubsidized Loan.

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.

A TEACH Grant applicant is required to complete an ATS each award year before he or she receives a TEACH Grant. The Department uses the information collected on the ATS to process TEACH Grant

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awards, and to service any TEACH Grants that are later converted to Direct Unsubsidized Loans. The ATS also informs a TEACH Grant applicant of the requirements of the TEACH Grant Program and serves as the applicant's legally binding agreement to meet those requirements and to repay any TEACH Grants received as a Direct Unsubsidized Loan if the applicant does not meet the TEACH Grant Program requirements.

The Department is requesting a revision of the currently approved ATS. We are proposing only minor wording changes in Sections A through C of the ATS for greater clarity and, in one place, to make the language used in the ATS more consistent with the corresponding regulatory language. Most of the proposed changes to the ATS are in Section D, the portion of the ATS that explains the terms and conditions that will apply if a TEACH Grant is converted to a Direct Unsubsidized Loan. This section of the ATS shares much of the same text as the Borrower's Rights and Responsibilities Statement that is included as part of the Direct Subsidized Loan/Direct Unsubsidized Loan Master Promissory Note (MPN), approved under OMB No. 1845-0007. We are making numerous changes to the text of Section D of the ATS to make the language consistent with the corresponding language used in the most recent version of the MPN.

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.

The Department makes maximum use of available information technology to process TEACH Grants. Institutions of higher education that participate in the TEACH Grant Program electronically receive data provided by the student on the Free Application for Federal Student Aid (FAFSA), create TEACH Grant award records based on the FAFSA data and additional data provided by the institution, and submit these records to the Department through an electronic process. Most of the information requested in Sections A and B of the ATS is prepopulated, reducing burden on TEACH Grant applicants.

TEACH Grant applicants complete the ATS through an entirely electronic process on a web site maintained and operated by the Department, using a personal identification number (PIN) provided by the Department. The institution that a TEACH Grant applicant is attending is notified electronically when the applicant has completed an ATS. After completing and submitting an ATS, a TEACH Grant applicant may download and print a copy of the completed ATS for his or her records. The Department stores the completed electronic ATS as the authoritative copy of the ATS.

The ATS may only be completed electronically. A paper version is not available.

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

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There is no information available from other sources that can be used for the purposes described in Item 2.

5. If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.

No small businesses are affected by this 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.

A TEACH Grant applicant must complete a separate ATS for each award year that he or she receives a TEACH Grant. If an applicant did not complete an ATS, he or she could not receive a TEACH Grant.

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.

The collection of this information will be conducted in a manner that does not involve any of the above conditions.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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 ATS reflects the terms and conditions of the TEACH Grant Program as set forth in 34 CFR 686. The regulations governing the TEACH Grant Program were developed through negotiated rulemaking, with an opportunity for the public to submit comments, and the currently approved ATS was cleared through a process that provided for two public comment periods.

A notice was published in the Federal Register on November 12, 2014 (79 FR 67162) inviting the public to submit comments on the proposed revised ATS. We received no public comments in response to this notice. However, we have made a number of changes to the ATS in response to comments submitted internally by the Department's TEACH Grant servicer. These changes are non-substantive and are intended to improve overall clarity and simplify the organization of the ATS. A second Federal Register notice will be published to provide the public with an opportunity to comment on the further revised ATS.

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

No payments or gifts will be provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The ATS includes a Privacy Act Notice that (1) informs the applicant of the statutory authority for the information collection, (2) explains that disclosure of the information is voluntary, but is required in order to determine the applicant's eligibility to receive a TEACH Grant, and (3) identifies the third parties to whom the information may be disclosed, and explains the circumstances under which such disclosures may occur.

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 ATS does not require a borrower to provide any information that would be considered sensitive.

12. Provide estimates of the hour burden of the collection of information. The statement should :

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 item 16 of IC Data Part 1.**
- **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 Item 14.**

The Department estimates the total annual number of respondents for this information collection to be 34,116. The estimated time required to complete an ATS is 0.5 hours (30 minutes). Based on one response per respondent, this equates to a total estimated annual reporting burden of 17,058 hours.

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.

Total Annualized Capital/Startup Cost: 0

Total Annual Costs (O&M): 0

Total Annualized Costs Requested: 0

There are no capital/startup costs to respondents, nor are there any annual costs to respondents associated with operating or maintaining systems or purchasing services.

Because TEACH Grant respondents may only complete the ATS electronically, the only cost burden to respondents associated with this collection would be minimal costs imposed by Internet providers for Internet access.

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 total estimated annual cost to the Federal government for this information collection is \$800,000.00.

15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.

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The Department is reporting a downward adjustment of 1,575 hours. This adjustment is due to a slight decrease in the number of individuals who receive TEACH Grants each year.

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 results of this information collection will not be published.

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.

The Department is not seeking this approval.

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

The Department is not requesting any exceptions to the Certification for Paperwork Reduction Act Submissions.

B. Collection of Information Employing Statistical Methods

This collection of information will not employ any statistical methods.