

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
TEACHER EDUCATION ASSISTANCE FOR COLLEGE AND HIGHER EDUCATION
GRANT ELIGIBILITY REGULATIONS

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.

The College Cost Reduction and Access Act (the CCRAA), Pub. L. 110-84, 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 regulations for this program are in 34 CFR 686.

The following sections of the TEACH Grant regulations are included in this information collection: 686.4, 686.11, 686.32, and 686.34. These regulations can be reviewed at [34 CFR 686](#).

The regulations in 686.4 require an institution that ceases to participate or becomes ineligible to participate in the TEACH Grant program during an award year to report to the Department of Education within 45 days after the effective date of the loss of eligibility. The report must include the name of each TEACH Grant eligible student, the amount of the TEACH Grant funds paid to each student for that award year, and the amount of TEACH Grant funds due each eligible student through the end of the payment period. Also, the institution must provide an accounting of all TEACH Grant expenditures for that award year to the date of termination.

The regulations in 686.11 establish that in addition to meeting the student eligibility requirements, in order to receive a TEACH Grant the applicant must submit the designated application, sign a TEACH Grant agreement to serve (this burden is captured under OMB Control Number 1845-0083), and enroll in a TEACH Grant eligible institution. In addition, the grant recipient must either maintain a cumulative grade point average of 3.25 on a 4.0 scale during each payment period or score above the 75th percentile on at least one of the battery of nationally- normed standardized test.

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

The regulations in 686.32 require an institution to provide initial, subsequent, and exit counseling to each TEACH Grant recipient and maintain documentation substantiating the counseling requirements.

The regulations in 686.34 require the institution to promptly provide written notification to a student requesting repayment of any overpayment that the institution does not have responsibility to repay. The regulations also require that the institution refer the student to the Department if the student does not take positive action to promptly resolve the TEACH Grant overpayment.

This is a request for an extension of the existing burden hours in OMB Control Number 1845-0084 which provides for program administration and is necessary to determine eligibility to receive program benefits and to prevent fraud and abuse of program funds.

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 TEACH Grant program is maintained at participating institutions of higher education. The majority of the collection requirements are for recordkeeping at the institution. The required reporting to the Department of Education (Department) relates to ceasing participation or losing eligibility to participate.

The recordkeeping and reporting requirements of these regulations assure accountability of program participants for proper program administration and justify the payment of funds by the federal government. The collection of this information aids in assuring that the Federal dollars are not lost to fraud, waste or abuse.

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 required enrollment for institutions of higher education in the TEACH Grant program is done through the e-Application process, the disbursement and overpayment reporting is done through the Common Origination and Disbursement system. These are all electronic systems operated by the Department.

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.

These regulations were created with the participation of affected parties who had a vested interest in avoiding duplication. The required information is not captured in any other Department system.

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.

No small businesses are impacted by this 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.

The recordkeeping and reporting requirements are necessary to ensure accountability of program participants for proper program administration and less frequent collection could impair accountability of program participants.

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 is consistent with the guidelines in 5 CFR 1320.5(d)(2).

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 regulations have not changed since their original development during the negotiated rulemaking and the final rule process. There was a request for additional information about the program received as a comment during the 60 day comment period. This is the 30 day notice to be published in the Federal Register providing the public with an additional opportunity to submit comments on the proposed burden.

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

No payments of gifts will be provided to the 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 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 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.

A Privacy Act Notice is included on the Free Application for Federal Student Aid (FAFSA) application form and the TEACH Grant Agreement to Serve. In both of these forms, the applicant is informed of the statutory authority for collecting the information requested. Although the disclosure of the information is voluntary, the recipient is informed that in order to be considered for TEACH Grant funds, the information must be provided.

The information provided is used to verify the grant recipient's identity, to determine the grant recipient's eligibility to receive the TEACH Grant benefits, and in those cases where a TEACH Grant is converted to a Direct Unsubsidized Loan, to permit the servicing of the borrower's loan(s), and to locate the borrower and collect on the loan(s) if the loan(s) become delinquent or default. A listing of the persons and entities to which

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 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)

the information may be disclosed and for what purposes the information may be disclosed is also included.

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 Department is not requesting any sensitive data.

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

TEACH Grants:

Section 686.4 – Institutional participation

Burden Assessment:

We anticipate a continued 17% or 979 of the 5,759 Title IV eligible institutions will participate in the TEACH Grant program. No institution has officially withdrawn from the program. Therefore, we are adjusting to .5% or 5 the estimated number of institutions that will cease to participate or lose eligibility to participate in the program.

The program's participation rate has been higher than estimated in the previous burden calculation. The 2015 Fiscal Year (FY15) budget request indicates there were 33,700 TEACH Grant recipients in FY 14. There would be an average of 34 students

participating in the program at each eligible institution. To meet the reporting requirements, we estimate that the burden associated with ceasing participation or losing eligibility would be 43 hours.

# of Eligible Institutions		5,759
% of Institutions participating in TEACH Grant Program	X	<u>.1700</u>
# of Participating Institutions		979
Projected % of Institutions ceasing Participation or becoming ineligible	X	<u>.005</u>
# of Affected Institutions		5
Projected # of TEACH Grant eligible Students		33,700
Divided by # of Participating Institutions		<u>/979</u>
Average projected number of students Participating in TEACH Grant program At each Institutions		34
Average projected amount of time to report Student and funding data at 15 minutes per student record	X	<u>.25 hours</u>
Burden hours per affected institutions		8.5 hours
Times the # of affected institutions	X	<u>5</u>
Total Burden Hours		43 hours

Affected Entities:

	# of Respondents	# of Responses	Hours/ response	Total hours
Business or other for-profits	1	1	8.5	9
Not-for-profits	2	2	8.5	17
Public institutions	2	2	8.5	17
TOTAL	5	5		43

Section 686.11 – Eligibility to receive a grant

There are several categories of grant recipients where the cumulative grade point average of 3.25 must be maintained for each payment period. Those categories are:

- I. The initial payment period:
 The final cumulative high school GPA for a first term undergraduate recipient –
 The TEACH eligible institution must document the student’s secondary school GPA from an LEA, an SEA or other State agency, a public or private high

school, or in the case of a home schooled student, obtain documentation of the secondary school GPA from the parent or guardian.

The undergraduate cumulative GPA for either the post-baccalaureate or graduate student recipient –

The TEACH eligible institution must document the student’s undergraduate school GPA.

The transfer student cumulative GPA as determined by the current TEACH Grant eligible institution –

The TEACH eligible institution must document the student’s GPA based upon the method established by the institution to accept coursework completed from any prior postsecondary institution that it accepts.

II. Subsequent payment periods:

The cumulative GPA based on courses taken at the TEACH eligible institution through the most-recently completed payment period, or

III. Alternatives to the cumulative GPA:

Scoring above the 75th percentile of at least one of the battery of test from a nationally-normed standardized test, or

The grant recipient is currently a teacher or retiree who is applying for a TEACH Grant to obtain a master’s degree in an eligible TEACH Grant program.

Burden Assessment:

Assuming a continued 7% of FAFSA applicants in 2013-2014 expressing an interest in the TEACH Grant program, there would be approximately 1,483,545 applicants for the TEACH Grant. Prior data indicate that 10% or 148,355 applicants actually apply. The FY 2015 Budget indicates that approximately 22.715% or 33,700 TEACH Grants were received in 2014 with an anticipated 34,116 TEACH Grant to be awarded in 2015.

The burden assessment below breaks out burden attributable to applicants as well as recipients.

Initial payment period:	# of Respondents	Hours/ response	Total hours
High school GPA			
Applicants	13,352	.250	3,338
Recipients	3,033	.250	758
Undergraduate GPA			
Applicants	40,056	.017	681
Recipients	9,099	.017	155
Transfer student GPA			
Applicants	13, 352	.167	2,230
Recipients	3,033	.167	507

Subsequent payment period:	# of Respondents	Hours/ response	Total hours
Standardized tests			
Applicants	65,276	.017	1,110
Recipients	14,828	.017	252
Current Teachers/Retirees			
Applicants	16,319	.167	2,725
Recipients	3,707	.167	619
All recipients X .80	26,960	.017	458
Subtotals			
Applicants	148,355		10,084
Recipients	33,700		2,291
Subsequent recipients	<u>26,960</u>		<u>458</u>
TOTALS	209,015		12,833

Affected Entities:

	# of Respondents	# of Responses	Total hours
INDIVIDUALS:			
High School GPA			
Home school parents	13	13	4
INSTITUTIONS:			
Business or other for-profits	10	2,090	128
Not-for-profits	519	110,771	6,800
<u>Public institutions</u>	<u>450</u>	<u>96,141</u>	<u>5,901</u>
TOTAL:	992	209,015	12,833

Section 686.32 – Counseling requirements

Types of TEACH Grant counseling:

In-person: We project that an in-person presentation (individual or group) will take approximately .33 hours (20 minutes) per presentation. We project that 49 institutions new to the program will require 10 hours to develop the required in-person presentation materials that will cover the three types of counseling required. We project that 930 participating institutions will annually update the in-person presentation materials that will cover the three types of counseling required and will require 1 hour for review and revision.

Audio-visual (A/V) presentation: We project that the A/V presentation will take approximately .33 hours (20 minutes) per presentation. We project that 29 institutions new to the program will require 6 hours to develop the A/V presentation materials that will cover the three types of counseling required. We project that it will take 1 hour annually to review and update an A/V presentation that will cover the three types of

counseling required and we project that 391 institutions will update such A/V presentations.

Interactive (on-line): We project that the on-line presentation will take approximately .33 hours (20 minutes) per presentation. We project that it will take 29 institutions new to the program will require 7 hours to develop the on-line presentation that will cover the three types of counseling required. We project that it will take 1 hour annually to review and update an on-line presentation that will cover the three types of counseling required and we project that 450 institutions will update such on-line counseling presentations.

Affected Entities:

INDIVIDUALS

Recipient Initial counseling:

We project that 20% of the 33,700 recipients or 6,740 recipients will require Initial Counseling

Recipient Subsequent counseling:

We project that 80% of the recipients or 26,960 recipients will need subsequent counseling in a year of their TEACH Grant program participation.

Recipient Exit counseling:

We project that 20% of the recipients or 6,740 recipients will need Exit counseling in a year of the TEACH Grant program.

Respondents:	Responses:
Initial Counseling	6,740
Subsequent Counseling	26,960
<u>Exit Counseling</u>	<u>6,740</u>
Total # of Respondents	40,440 x .33 hrs = 13,345 burden hours

INSTITUTIONS

In-person counseling: 930 institutions
Presentation review and update x 1 hour
930 hours

Presentation development 49 institutions
x 10 hours
490 hours

Providing in-person counseling

We project that 10% of the recipients will want in-person counseling and that the counseling will average 20 minutes (.33 hours).

33,700 recipients
x .10
3,370
x .33 hours
1,112 hours

AV Counseling:	391 institutions
Presentation review and update	<u>x 1 hour</u> 391 hours
Presentation development	29 institutions <u>x 6 hours</u> 174 hours
Providing AV counseling	
We project that 10 % of the recipients will want AV counseling and that the counseling will average 20 minutes (.33 hours).	
	33,700 recipients <u>x .10</u> 3,370 <u>x .33 hours</u> 1,112 hours
On-Line Counseling:	450 institutions
Presentation review and update	<u>x 1 hour</u> 450 hours
Presentation development	29 institutions <u>x 7 hours</u> 203 hours
Providing AV counseling	
We project that 80 % of the recipients will want on-line counseling and that the counseling will average 20 minutes (.33 hours).	
	33,700 recipients <u>X .80</u> 26,960 <u>X .33 hours</u> 8,897 hours
Annual Review and Update:	
In-person counseling	930 hours
AV	391 hours
On-line	<u>450 hours</u>
Sub-Total	1,771 hours
Initial Development:	
In-person counseling	490 hours
AV	174 hours
On-line	<u>203 hours</u>
Sub-Total	867 hours

Actual Counseling:	
In-person counseling	1,112 hours
AV	1,112 hours
On-line	<u>8,897 hours</u>
Sub-Total	11,121 hours
 TOTAL	 13,759 hours

Affected Entities:

	# of Respondents	# of Responses	Total hours
INDIVIDUALS:	40,440	40,440	13,345
INSTITUTIONS:			
Business or other for-profits	10	10	138
Not-for-profits	519	519	7,292
Public institutions	<u>450</u>	<u>450</u>	<u>6,329</u>
TOTAL:	41,419	41,419	27,104

Section 686.34 – Liability for and recovery of TEACH Grant overpayments

We project that .1% of the estimated 33,700 recipients will owe a TEACH Grant overpayment. However, all eligible institutions must have a written notice for requesting repayment of a TEACH Grant overpayment when a student has responsibility to repay along with notification that the student will become ineligible for additional Title IV, HEA program funds. The participating institutions must establish procedures to refer an overpayment when a student fails to make satisfactory repayment arrangements or fully repay the overpayment.

We estimate that it will take students .167 hours (10 minutes) to read the written notification and respond to the TEACH Grant overpayment notice. And we estimate that each participating institution will require .33 hours (20 minutes) to annually review the notification and make the required referrals.

Affected Entities:

	# of Respondents	# of Responses	Hours/ response	Total hours
INDIVIDUALS:	34	34	.167	6
INSTITUTIONS:				
Business or other for-profits	10	10	.33	3
Not-for-profits	519	519	.33	171
Public institutions	<u>450</u>	<u>450</u>	<u>.33</u>	<u>149</u>
TOTAL:	1,013	1,013		329

Current Burden Associated with the Regulations:

# of Respondents	# of Responses	#Burden Hours
231,172	233,276	33,568

Revised Burden Associated with the Regulations after Review:

# of Respondents	# of Responses	#Burden Hours
41,466	251,452	40,309

Difference:

# of Respondents	# of Responses	#Burden Hours
-189,706*	+18,176	+6,741

*This decrease in respondents is done to account for a mistaken multiple counting of universe of eligible and participating institutions.

Staff costs at \$36.55 per hour calculate to an estimated total of \$1,473,294 institutional costs to review, update and develop required counseling materials.

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 additional costs not identified in item 12.

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.

There is no additional cost to the Federal government.

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).

This is a request for an extension of the current information collection. There has been no change to the statute or regulations for the TEACH Grant program. The upward adjustment in burden of 6,741 hours is due in part to an increase in the participation in the program from the prior filing based on the FY15 Budget figures for the FY14 usage data.

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 result of the collection of information 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 Submission".