

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
OMB Number: 1845-0077**

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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 Higher Education Act of 1965, as amended, (HEA) allows for up to a one hundred percent cancellation of a Federal Perkins Loan and loan forgiveness of a Federal Family Education Loan and Direct Loan program loan if the graduate teaches full-time in an elementary or secondary school serving low-income students.

The data collected for the development of the Teacher Cancellation Low Income Directory provides web-based access to a list of all elementary and secondary schools, and educational service agencies that serve a total enrollment of more than 30 percent low income students (as defined under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended). The Directory allows post-secondary institutions to determine whether or not a teacher, who received a Federal Perkins Loan, Direct Loan, or Federal Family Education Loan at their school, is eligible to receive loan cancellation or forgiveness or that a teacher who received a TEACH Grant is meeting the service obligation.

The regulatory authority governing the Teacher Cancellation process for the loan programs and the verification of the obligation to serve for the TEACH Grant for which the TCLI Directory is used are:

Federal Perkins Loan funds [34 CFR 674.53](#) ;

Federal Family Education Loan (FFEL) [34 CFR 682.216](#) ;

William D. Ford Direct Loan (DL) Program [34 CFR 685.217](#) ;

and

Teacher Education Assistance for College and Higher Education (TEACH) Grant Program [34 CFR 686.40](#).

Effective August 14, 2008, The Higher Education Opportunity Act (P. Law 110-315) amended section 465(a)(2)(A) of the Higher Education Act of 1965, as amended, to authorize loan cancellation or

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

forgiveness for full-time teaching service in locations operated by an educational service agency. Sections of the Higher Education Act of 1965, as amended, that govern these programs can be found at the Office of Postsecondary Education [Policy Resource](#) page.

The list of schools and educational service agencies that serve low-income families in the TCLI Directory qualifies teachers for loan cancellation under the Federal Perkins Loan Program, and loan forgiveness under the Federal Family Education Loan (FFEL) Program and the William D. Ford Federal Direct Loan (Direct Loan) Program. This list also satisfies certain aspects of the teaching obligation in the Teacher Education Assistance for College and Higher Education (TEACH) Grant program. If a State does not update its list of low-income schools, Perkins, FFEL and Direct Loan borrowers and TEACH Grant recipients who teach in that State may not receive Federal program benefits to which they may be entitled.

Changes being made to the TCLI Directory

No additions are being made to the data collection. This submittal is to:

- *Renew the expiration date as it expires 6/30/2015,*
- *Provide updated address information, and*
- *Provide minor verbiage update.*

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.

Information is obtained from State Agencies that contribute to the development of a directory of elementary and secondary schools and educational service agencies that serve low-income families that qualify for the teacher cancellation benefit. Failure to collect this information would prevent teachers from receiving specific student loan cancellations or knowing if they are meeting requirements of the TEACH Grant.

Colleges and universities use the information in the Directory to research schools that meet the criteria for their students to take advantage of specific student loan teacher cancellation and TEACH Grant benefits.

The public (students and their families) use information in the Directory to research career choices that will allow them to take advantage of specific student loan teacher cancellation and TEACH Grant benefits.

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 Teacher Cancellation Low Income Directory is a web-based system. Changes and updates to the directory may be made whenever necessary. Also, any changes to the directory are made in real time. This allows students who may be authorized to have all or part of their loans forgiven for teaching at schools that meet the criteria as being designated as a low income school to have access to immediate and accurate data.

The Teacher Cancellation Low Income directory can be accessed at <https://www.tcli.ed.gov>.

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.

The TCLI Directory data collection requires inclusion of both public and private nonprofit elementary and secondary schools and educational service agencies where more than 30 percent of the school's or educational service agency's total enrollment is made up of children who qualify for services provided under title I. Standard language provided to the state contacts providing the data explains the flexibility of the state in determining the measure of 30%:

To qualify for inclusion on the Directory of Designated Low Income Schools, a school must be in a school district of a local education agency that is eligible for assistance under Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), and the school must be a school "in which the number of children meeting a measure of poverty under section 1113(a)(5) of the Elementary and Secondary Education Act of 1965, exceeds 30 percent of the total number of children enrolled in such school" (Section 465(a)(2)(A)(i)(I), Higher Education Act of 1965, as amended). The "measures of poverty," as set out in section 1113(a)(5) of the ESEA, are:

"(5) MEASURES- The local educational agency shall use the same measure of poverty, which measure shall be the number of children ages 5 through 17 in poverty counted in the most recent census data approved by the Secretary, the number of children eligible for free and reduced priced lunches under the Richard B. Russell National School Lunch Act, the number of children in families receiving assistance under the State program funded under part A of title IV of the Social Security Act, or the number of children eligible to receive medical assistance under the Medicaid program, or a composite of such indicators, with respect to all school attendance areas in the local educational agency. . ."

The availability of the most current data is of concern for the teachers meeting the specific requirements for loan forgiveness and or meeting the service requirements of the TEACH Grant. Each year, in July, the TCLI Directory is updated to accept the most recent year data while also continuing to accept updates and changes to data in past years. The current data provided by the states is available real-time and the

system is open year-round for public and government use and available for update year-round by state contacts.

FSA recognizes that ED Facts (www.ed.gov/open/plan/edfacts) does collect data from Title I schools. However, in discussions with the staff that works with the ED Facts data collection, we've learned that the data within ED Facts would not specifically meet the TCLI Directory immediate needs of:

- Both public and private school data:
ED Facts contains public school data. Private school data would come from a different request of data.
- Flexibility in statutory options that states use to determine the 30% measure of poverty:
In order to use ED Facts data, FSA would have to define the 30% measure.

Annual communications are sent to each state contact providing information and instructions concerning the current data upload to the TCLI Directory. In addition, a link to the State Contact User's Guide is being implemented on the TCLI Web site.

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.

The collection of this information does not involve small businesses or other small entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Also describe any technical or legal obstacles to reducing burden.

If the collection is not conducted or is done less frequently, the ability to cancel student loans that qualify for cancellation throughout the school year would be hindered as explained in item 4. "Efforts to Identify Duplication" above.

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 inconsistent with these guidelines.

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 data is requested from State agencies only. A sixty-day Federal Register Notice was published to allow public comment. No public comment was received. This request is for the 30-day notice to allow for public comment.

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

There are no payments or gifts to 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.

The Department makes no pledge about the confidentiality of the data.

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.

This collection does not include information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

The statement should:

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)

- **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.**

There are a total of 57 State and Territorial agency respondents. The data can be updated at any time and is used by four financial aid programs in the Department. State agencies collect data from elementary and secondary schools in their districts, review the data, and update and add any new data to the Directory as necessary. In an effort to reduce the burden to the states, Federal Student Aid maintains the TCLI Directory so that it is available year-round and is easy to use. Clarifications to online text have been added to assist in the user's understanding of data to be reported and how to upload, add, and modify data and contact information. A link to the State Contact User's Guide has been added to the Web site so that it, too, is always available to the user. A random sample of a few State agencies showed that it took an average of three 40-hour work weeks to collect, review and input data in the Directory. (See matrix below.)

Est. No. of Respondents		Est. Avg. Person Hours per Respondent - Reporting	Est. Avg. Person Hours per Respondent - Record Keeping	Total Hours
State & Territorial Agencies	57	40	80	6840 (57 x 120)
		Average Salary of		Total Salary Cost

	Respondents	of all Respondents
	\$26.90 per hour	\$183,996 (Total hours x Salary)

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 : \$0

Total Annual Costs (O&M) : \$0

Total Annualized Costs Requested : \$0

The nature of business for State and Territorial agencies is such that purchases of equipment and provision of services that are required for completion of their directory submissions are a part of their customary and usual business practice. They use the type of equipment and services normally necessary to successfully operate any State entity. Therefore, no special equipment or services are required for providing data.

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 matrix below describes the separate costs for TCLI Directory.

TCLI Directory Publication and Distribution Costs	
The TCLI web operations and maintenance cost is incorporated into the eCampus-Based System web operations. There are no separate operations and maintenance or publication and distribution costs.	
Total	\$0

TCLI Directory Operations & Maintenance Contract Costs

Collabralink
 8405 Greensboro Drive
 Suite 1200
 Falls Church, VA 22102

The current annual O&M costs for the eCB system include the FISAP and Reallocation forms¹ as well as the TCLI Directory², Work Colleges Application and Expenditure forms³, and the CTP-Intellectual disabilities form⁴.

¹The FISAP and Reallocation Form is a separate data collection with OMB control number 1845-0030

²The TCLI Directory is a separate data collection with OMB control number 1845-0077.

³The number of schools participating in the Work Colleges program is static at 7 participants. There is no OMB control number for this data collection.

⁴The CTP form is a separate data collection with OMB control number 1845-0113.

Note:

Annual O&M Contract cost - \$1,473,339 = monthly cost \$122,778 allotted as:

FISAP (8 months) = \$982,226

Reallocation (1 month) = \$122,778

TCLI Directory (1 month) = \$122,778

Work Colleges (1 month) = \$122,778

CTP-Intellectual Disabilities (1 month) = \$122,778

Total TCLI Directory O&M Costs (1 month)

\$122,778.26

TCLI Directory Staffing Operations and Overhead Costs

A staff of 8.5 FTE's is required for the operation of the campus-based programs and the eCB system. This includes the FISAP and Reallocation forms as well as the TCLI Directory, Work Colleges Application and Expenditure forms, and the CTP-Intellectual disabilities form as footnoted above. The types of program staff include managers, accountants, financial management specialists, technicians, systems analysts, and clerical staff. The total amount of annual salaries devoted to eCampus-Based activities is \$1,354,102.

Using the Salary Table 2014-DCB Effective January 2014, the average hourly wage of the current staff composition is \$51.02.

Note:

The total amount of annual salaries devoted eCB activities is divided as:

Reallocation (3 staff @ 120 hrs ea x \$46.94) = \$18,366.92

TCLI Directory (1 staff @ 80 hrs x \$46.94) = \$4,081.54

Work Colleges (1 staff @ 160 hrs x \$46.94) = \$8,163.08	
CTP-Intellectual Disabilities (1 staff @ 160 hrs x \$46.94) = \$8,163.08	
FISAP (Total salaries less Reallocation, TCLI Directory, Work Colleges, CTP-Intellectual Disabilities) = \$1,402,249.38	
TCLI Directory Yearly Staff Costs	\$4,081.54
TCLI Directory Yearly Overhead Costs	
A standard budget estimate of 16% was used to determine the overhead costs of staff operations including such items as equipment, utilities, work materials, etc. (\$4,081.54 x 16% = \$653.05)	
Yearly Overhead Costs	\$653.05
Total Staff and Overhead Costs to the Federal Government	\$4,734.59

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 currently approved information collection 1845-0077. There has been no change to the underlying regulatory requirements. We are requesting a correction to the number of current responses. There are only 57 responses anticipated, one for each of the affected entities. The current clearance indicates 114 responses. We believe this was a typographical error in the previous submission. While entities can submit data more than one time per year, the average is once a year. The estimated total annual reporting and record keeping hour burden has not changed from the current OMB inventory of 120 hours per respondent, times 57 respondents for a total burden of 6840 hours.

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.

This information collected in the TCLI Directory is not collected for statistical publication.

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.

There are no exceptions to the certification statement.