

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

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 section. 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.

This information collection is required under regulations governing the Teacher Quality Enhancement Grants Program (TQE), as authorized by the Higher Education Act (HEA) of 1965, as amended.

The U.S. Department of Education (ED) is requesting a revision of a currently approved collection. The purpose is to continue implementing the requirement that students in teacher preparation programs who receive scholarships under TQE must repay those scholarships if they do not teach in high-need local educational agencies (LEAs) for the same time period that they received financial assistance. This requirement is found in section 204(e) of the HEA, as amended, Public Law 105-244. www.ed.gov/programs/tqpartnership/index.html.

In addition, the regulations governing TQE include the following specific provisions requiring the collection of this information:

- Section 611.41 describes the circumstances under which an individual may receive a scholarship to attend a teacher training program and spells out the terms and conditions that will be binding on the recipient.
- Section 611.42 describes how the period of service for the scholarship recipient will be determined and the information that ED will need from the institution of higher education (IHE) that awards the scholarship and from the high-need LEA where the scholarship recipient ultimately teaches.
- Section 611.43 describes the consequences of a scholarship recipient's failure to meet the service obligation.
- Section 611.44 describes the circumstances under which the Secretary may defer a scholarship recipient's service requirement and the process for obtaining renewal of the deferment.

- Section 611.45 describes the circumstances under which the Secretary may discharge a scholarship recipient's obligation to repay a scholarship.
- Section 611.46 describes the scholarship recipient's reporting responsibilities with regard to his/her employment with a high-need LEA or request for a deferral.
- Section 611.47 describes a scholarship recipient's reporting responsibilities upon the close of the LEA's academic year.
- Section 611.48 describes the scholarship recipient's reporting responsibilities upon failure to graduate or withdrawal of scholarship support.
- Section 611.49 describes the grantee's responsibilities for implementing the scholarship requirements before awarding a scholarship. These responsibilities include insuring recipients understand and execute the terms and conditions of ED's approved scholarship agreement.
- Section 611.50 describes the grantee's responsibilities in helping to implement the scholarship requirements. These responsibilities include providing specific information to ED concerning the recipients when they are first accepted in the program and providing information to ED concerning any recipient's graduation or withdrawal from the program.

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 purpose of this information collection is to: 1) identify the recipients of financial assistance provided by TQE; 2) subsequently track the employment history of these individuals to ensure that they are in compliance with program requirements; 3) enable recipients—as appropriate—to request deferments of their service obligation or a repayment schedule, if they become obligated to repay their scholarships; and 4) track scholarship recipients who default on their obligation and to pursue collection of funds from these individuals.

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 of using information technology to reduce burden.

OPE worked with ED's Office of the Chief Information Officer (OCIO) for the development of an electronic system that will support the collection of TQE scholarship monies from individuals whose scholarships convert to loans when they choose not to teach in a high-need area after graduation and certification. TQE commissioned an online database system called the Title II Scholarship Administration and Reporting System (TSAR). Data about the recipients is entered into the TSAR and is easily searchable to obtain the most current information on the status of the

recipient. The system has been live since September 2008 and replaces an earlier Access database.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

Because data collected are specific to recipients of TQE scholarship funds, there is no similar or duplicate collection occurring. The information and purposes described in Item 2 are distinctive to this program.

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 application does not involve the collection of information from 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, as well as any technical or legal obstacles to reducing burden.

The reporting and record-keeping requirements are the minimum required to implement the program statute and program regulations. To require that they be performed on a less frequent basis would reduce ED's ability to effectively administer the program in accordance with statutory and regulatory provisions, and is apt to result in an inability to recover funds from scholarship recipients who fail to abide by the terms of their scholarships.

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 the collection to be conducted in any other manner other than that listed above.

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.

Representatives outside ED were consulted with regard to the documents in past years. No comments were received, no significant problems were identified, and the original estimates of record-keeping burden were seen as generally accurate. In addition, feedback is consistently solicited from scholarship recipients. No significant problems have been identified, and the original estimates of record-keeping burden have been seen as generally accurate. 60 and 30 day notices seeking public comment will be published in the Federal Register.

The 60 day FR notice was published on December 15, 2016, Vol. 81, page 90797. No public comments have been received to date.

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

No payments or gifts will be made 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. 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.

In order to implement the requirements of the statute, confidential information on scholarship recipients will be collected. Any data that is required and maintained by ED itself will be maintained in accordance with the Privacy Act of 1974, as amended. To assure that sensitive data about scholarship recipients are not compromised, all data—whether submitted electronically or as hard copy—will be maintained in a secure location. Access to these data will be limited only to staff who are directly responsible for working with TQE and this information is only available onsite at the TQE office via desktop computer.

As noted in the Privacy Act of 1974 (5 U.S.C. 552a), the authority for collecting the requested information from and about TQE scholarship recipients is Title II, Section 204(e) of the Higher Education Act of 1965, as amended, and 31 U.S.C. Chapter 37. IHE students are advised that participation in the Teacher Quality Enhancement Grants scholarship program is voluntary and that giving the Department their Social Security Numbers (SSNs) is voluntary, but they must provide the requested information, including their SSNs, to participate. The information will be used to ensure that recipients of scholarships provided with funds under Title II of the Higher Education Act subsequently: (1) complete a teacher education program and teach in a high-need school of a high-need local educational agency for a period of time equivalent to the period for which the recipient received scholarship assistance; or (2) repay the amount of the scholarship. The information in students' records may be disclosed to third parties as authorized under routine uses in the appropriate systems of records, either on a case-by-case basis, or, if the Department has complied with the computer matching requirements of the Privacy Act, under a computer matching agreement

A Privacy Act System of Record was published for this collection. It was published as: Teacher Quality Recruitment Scholarship Program, Vol 65, page 60172, 10/10/2000 - Teacher Quality Enhancement Grants Program Scholarship.

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. This 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.**

We are no longer awarding TQE scholarships—we are only collecting and updating the files to close out the program. There are about 1500 recipients that are in an incomplete status, and we are reviewing their files and requesting that the ones who do not have a teacher verification form on file send one in.

Approximate Burden Hours for the Verification of Teaching Obligation Form

When scholarship recipients have completed their teacher training, they have six months in which to obtain employment with a high-need LEA. When they have done so, they are required to notify ED of their employment and have an LEA official certify annually that they are

employed in a high-need school in a high-need LEA. Subsequently, the LEA must certify annually that the recipient has fulfilled the teaching obligation at the end of the school year (and return the form to the recipient).

There are about 1500 recipients for whom we do not have completed Verification forms. It is anticipated that approximately 1000 TQE scholarship recipients will need to complete the form to notify ED of their employment in a high-need LEA within six months of completing their teacher preparation education. It is estimated that it will take the recipient approximately 1 hour per year to read and sign the form, give it to an official in the LEA in which they are employed, and send the form to ED.

Burden is estimated as follows: 1000 student recipients of Verification of Teaching Obligation Forms x 1 hour per respondent = 1000 hours.

Estimated Total Annual Recipient Burden Hours for Verification Form: 1000 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. 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 : _____

No other expenses are incurred other than those included 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.

The Annual Cost to the Federal Government is estimated as follows:

Professional staff to develop, package, and prepare clearance package (GS-13 employee) 40 hours x \$48.35 per hour	\$1,934
Professional staff to administer the record-keeping and secure information provided by grantee (GS-12 employee 50%) \$84,855 per year x 50%	\$42,428
Salaries Total Cost:	\$44,362
Overhead costs related to facilities, administration and other indirect costs plus accrual of leave and fringe benefits; estimated at 50% of salaries \$44,362 x 50%	\$22,181
Database (TSAR) Maintenance and On-Site Support -Contract for maintaining and processing of TQE scholarship applications/contracts, addenda, and verification of teaching obligation forms.	\$63,296
<u>Total Annual Cost Burden to Federal Government</u>	\$66,543 + \$63,296 = \$129,839

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).

ED is no longer collecting the TQE Scholarship Contractual Agreement or the TQE Scholarship Terms and Conditions Addendum that were previously included in this clearance package. We are only contacting recipients who do not have a Verification of Teaching Obligation Form on file showing that they completed the requirements. Burden estimates have been updated to reflect this change in the use of forms, as well as the anticipated number of scholarship recipients who will need to complete and submit the Verification Form.

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 the 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.

ED is not seeking this approval.

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

ED is not requesting any exceptions to the “Certification for Paperwork Reduction Act Submissions.”