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U.S. Department of Education

Special Education - Individual Reporting on
Regulatory Compliance Related to the Personnel Development Program
Service Obligation and the Government Performance and Results Act
(GPRA)

Supporting Statement

*Office of Management and Budget
Clearance Package Supporting Statement
And Data Collection Instrument*

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

INTRODUCTION

In the Individuals with Disabilities Education Act of 2004 (IDEA), Congress stated that “the education of children with disabilities can be made more effective by... supporting high-quality, intensive preservice preparation and professional development for all personnel who work with children with disabilities in order to ensure that such personnel have the skills and knowledge necessary to improve the academic achievement and functional performance of children with disabilities” (section 601(a)(5)(E)). To meet this need, the Office of Special Education Program's (OSEP) Personnel Development to Improve Services and Results for Children with Disabilities (CFDA No. 84.325) funds one of the largest personnel development grant programs in the U.S. Department of Education (ED).

The objectives of the Personnel Development Program (PDP) are to: a) Improve the curricula of IDEA training programs to ensure that personnel preparing to serve children with disabilities are knowledgeable and skilled in practices that reflect the current knowledge base; b) Increase the supply of teachers and service providers who are highly qualified for and serve in positions for which they are trained; and c) Enhance the efficiency of the expenditure of Federal dollars under this program.

OSEP is submitting this application to request approval to:

- Collect contact and training information for all scholars from PDP grantees;
- Collect employment information from PDP scholars; and,
- Verify employment information from employers for PDP scholars who fulfill their obligation through service.

The proposed data collection serves three purposes. First, data from three sources (grantees, scholars, and employers) are necessary to assess the performance of the PDP on its Government Performance Results Act (GPRA) measures (see Section A2, below). Second, data from all three sources are necessary to determine if scholars comply with the service obligation requirements. And finally, data are collected from PDP grantees for project monitoring and program improvement.

The proposed forms in this package are updates to existing Office of Management and Budget (OMB) approved forms (1820-0686): a) Scholar/Obligee Record Form (renamed Scholar Record); b) the Scholar/Obligee Employment Record Form (renamed Scholar

Training and Employment Record); c) the Employment Verification Record; and d) the Pre-Scholarship Agreement and Exit Certification Forms.

A. JUSTIFICATION

A1. Circumstances Making the Collection of Information Necessary

In order to ensure that OSEP is meeting the needs of children with disabilities and their families, OSEP needs to collect data on the results of its grant awards. These data include the number and characteristics (e.g., minority status, related professional experience) of professionals trained and the program outcomes (e.g., program completion, certification, employment in area supported by training). In addition, section 662 of IDEA requires OSEP to collect data to confirm that scholars who receive funding under this program complete their service obligation requirements. ED is responsible for collecting the necessary information, verifying the completion of the service obligation, and referring scholars to the Accounts Receivable and Bank Management Group (ARBMG) for repayment, if necessary.

These data are used to assess program effectiveness and efficiency, and to meet the reporting requirements of the Government Performance and Results Act (GPRA). The data will provide information on the supply of the OSEP-funded projects nationally, within each state, and within and across personnel categories, including special educators certified to teach children with disabilities, university faculty, related-service personnel, preschool service providers, paraprofessionals, administrators and other personnel (see Section 2A, below).

To collect the needed data, OSEP created the Personnel Development Program Data Collection System (PDPDCS). Through the PDPDCS grantees, scholars and employers report data electronically. To reduce respondent burden, clarify instructions, and better align to service obligation regulations, OSEP proposes the following changes to the instruments.

Grantee Data Collection (Scholar Record)

1. Removal of the term “obligee.” Previously, students who received funding through OSEP PDP grants were referred to as “scholars” while enrolled in the program and “obligees” after they exited the program. “Scholars/obligees” are now only referred to as “scholars” to reduce confusion. Furthermore, the use of “scholar” aligns with terms defined in the service obligation regulations.
2. Addition of a Privacy Act statement to explain the requirement for providing personally identifiable information and the authority for collecting that information.
3. Revision of the instructions for entering and submitting scholar records to align with the functionality of the system.

4. Clarification of the item for the Scholar Data Report ID at the end of Section A that it is only required of grants awarded in FY 2012 or earlier.
5. Addition of instructions in Sections D and K about uploading files and the requirement that grantees only use the OSEP OMB-approved agreements.
6. Revision of response options in items about the scholar's special education or related services focus area to better reflect accepted terminology in the special education field (Section F, items 2b and 2c; Section G, items 4 and 4b; and Section J items 2a and 2b).
7. Removal of items OSEP determined were not necessary to collect about scholar's training prior to enrollment in the OSEP-funded training program (Section F items 3, 4, 5a, 5b, 7, 9, and 10 and Section H items 5 and 6).
8. Clarification of instructions for items that grantees had difficulty understanding or knowing how to answer (Section G, items 1 and 3, Section H, Section I item 3).
9. Revision of question and response options in Section G item 3 about the age(s) or grade(s) of children the program is training the scholar to serve to address difficulties grantees had in responding.
10. Revision of term "Grant Fiscal Year" to "Budget Period" to reduce confusion and maintain consistent use of language for grantees in Section G items 5 and 6 and Section H.
11. Addition of response option "Not enrolled in the program" to Section G items 5 and 6 and Section H, as grantees needed an option for years scholars were not enrolled in the program.
12. Revision of response options in item 4 of Section H about type of employment to better reflect accepted terminology in the special education field.
13. Correction to the response options for item 2 in Section I, as it did not include an option that covered programs that were exactly one year in duration.
14. Addition of items 4 and 5 at the end of Section I. These items will be pre-filled and are information necessary for the grantees to complete the required Exit Certification.
15. Addition of response option "Course completion only" for item 1 in Section J, which is only displayed for grants awarded in FY 2009 or earlier.

Scholar Data Collection (Scholar Training and Employment Record)

1. Removal of the term "obligee." Previously students who receive funding through OSEP PDP grants were referred to as "scholars" while enrolled in the program and "obligees" after they exited the program. "Scholars/obligees" are now only referred to as "scholars" to reduce confusion.
2. Addition of Sections A through D and G of the Scholar Training and Employment Record to the clearance package. These sections are all pre-filled displays of

- information entered by the grantees in the Scholar Record. Some of the fields can be edited by the scholars.
3. Addition of two items at the end of Section D to collect information on scholars who exited the program prior to completion.
 4. Clarification of instructions for completing the Employment Record.
 5. Revision of response options in item 2 of the Employment Record about type of employment to better reflect accepted terminology in the special education field.
 6. Clarification of definition of “full-time” for item 3 of the Employment Record.
 7. Revision of response options in items 5 and 6 of Employment Record about the scholars training areas for their employment position to better reflect accepted terminology in the special education field.
 8. Revision to the “highly qualified” wording in item 8 of the Employment Record.
 9. Addition of Scholar Self-Employment Verification Procedures and Notary Request Form. These procedures and form are only used by scholars who are self-employed in place of the Employment Record and Employment Verification Record.

Grantee/Scholar Data Collection (Pre-Scholarship Agreement)

1. Removal of the term “obligee.” Previously students who receive funding through OSEP PDP grants were referred to as “scholars” while enrolled in the program and “obligees” after they exited the program. “Scholars/obligees” are now only referred to as “scholars” to reduce confusion.
2. Addition of a privacy act statement to explain the requirement for providing personally identifiable information and the authority for collectng that information.
3. Addition of statement that OSEP contracts with the Personnel Development Program Data Collection Center (DCC) to track the service obligations of scholars funded by PDP grants and address for the DCC.
4. Clarification for “Date of Enrollment” item that grantees had difficulty answering.
5. Addition of instructions to redact the social security number from the Pre-scholarship Agreement prior to uploading it to the PDPDCS.
6. Addition of items to collect scholar alternative email address, cell phone number and home phone number.
7. Clarification and correction of language in items d, e and g.
8. Addition of instructions at the end for uploading the Pre-Scholarship Agreement into the PDPDCS.

Grantee/Scholar Data Collection (Exit Certification)

1. Removal of the term “obligee.” Previously students who receive funding through OSEP PDP grants were referred to as “scholars” while enrolled in the program and “obligees” after they exited the program. “Scholars/obligees” are now only referred to as “scholars” to reduce confusion.
2. Addition of a Privacy Act of 1974 statement to explain the requirement for providing personally identifiable information and the authority for collecting that information.
3. Addition of statement that OSEP contracts with the Personnel Development Program Data Collection Center (DCC) to track the service obligations of scholars funded by PDP grants and address for the DCC.
4. Clarification of instructions for completing items 3, 4, and 5.
5. Addition of item 6, which grantees obtain from the Scholar Record in the PDPDCS.
6. Removal of “Service Obligation Information” table as the items were duplicative of information collected in other sections of the Exit Certification.
7. Removal of “Scholar Social Security Number” from “Scholar Contact Information” table as social security number is already collected through the Pre-Scholarship Agreement.
8. Addition of instructions at the end for uploading the Exit Certification into the PDPDCS.

Employer Data Collection (Employment Verification Record)

1. Removal of the term “obligee.” Previously students who receive funding through OSEP PDP grants were referred to as “scholars” while enrolled in the program and “obligees” after they exited the program. “Scholars/obligees” are now only referred to as “scholars” to reduce confusion.
2. Clarification of instructions for completing the Employment Verification Record.
3. Addition of items 2a, 3b, and 7, which had been inadvertently left out of the previous clearance package.
4. Clarification of definition of “full-time” for item 3a.
5. Revision of response options in item 4 about type of employment to better reflect accepted terminology in the special education field.
10. Revision to the “highly qualified” wording in item 8.

Authorization for Collection

This data collection is authorized by the following Public Laws:

The information is being collected under the authority of the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. 1462) and the implementing service obligation regulations at 34 CFR Part 304, as well as with the Government Performance and Results Act of 1993 (GPRA), section 4. In particular, these sections authorize this collection:

1) The service obligation requirement of the Personnel Development Program can be found in IDEA, Public Law 108-446, section 662(h)(1) which states that “Each application for assistance...shall include an assurance that the eligible entity will ensure that scholars who receive a scholarship under the proposed project agree to subsequently provide special education and related services to children with disabilities, or in the case of leadership personnel to subsequently work in the appropriate field, for a period of two years for every year which the scholarship was received or repay all or part of the amount of the scholarship, in accordance with regulations issued by the Secretary. Section 662(h)(3) “Secretary’s responsibility.—The Secretary—(A) shall ensure that individuals described in paragraph (1) comply with the requirements of that paragraph.”

- a) For scholarships made from grants made in fiscal year (FY) 2006 and every year thereafter, 34 CFR 304.23 through 304.30, which implements section 662(h) of IDEA for those fiscal years; and
- b) For scholarships made from FY 2005 grants, the notice published in the Federal Register on March 25, 2005 (70 FR 15306), which implements section 662(h) of IDEA for that fiscal year.

2) Public Law 108-446, section 662(a) (20 U.S.C. 1462) “The Secretary shall, on a competitive basis, make grants to, or enter into contracts or cooperative agreements with, eligible entities...to help address the needs identified in the State plan...for highly qualified personnel...to work with infants or toddlers with disabilities, or children with disabilities.”

3) Public Law 108-446, section 682(c) (20 U.S.C. 1482) “The Secretary may use funds made available to carry out subpart 2 or 3 to evaluate activities carried out under subpart 2 or 3, respectively.”

4) Education Department General Administrative Regulations (EDGAR) require that grantees cooperate in any evaluation of the program by the Secretary (EDGAR, section 75.591) (20 U.S.C. 1221e-3 and 3474).

A2. Purposes and Uses of the Data

There are three primary purposes for the data that are being collected. The first use is to fulfill Government Performance and Results Act (GPRA) reporting requirements. GPRA requires that Federally-funded agencies develop and implement an accountability system based on performance measurement. Grantees are required to report on their progress toward meeting the objectives and goals established for each ED grant program.

However, OSEP needs data directly from scholars and their employers in addition to grantee data for GPRA reporting.

The second use of the data is to fulfill the requirements of IDEA 2004 and the corresponding regulations (Service Obligations Under Special Education – Personnel Development to Improve Services and Results for Children with Disabilities 2006) to verify the fulfillment of the service obligations of scholars who receive scholarships from Institutions of Higher Education (IHEs) (grantees) under OSEP’s Personnel Development to Improve Services and Results for Children with Disabilities program. These requirements include grantee, scholar and employer input as well as referral of scholars to the ARBMG for repayment of part or all of the scholarship received, if they are not fulfilling their obligations through service.

Finally, the data collected are used by OSEP for project monitoring and program improvement, and to provide information on the characteristics of teachers and other personnel supported in these preparation programs and the outcomes of the grants (program completion, certification, employment in the area supported by training, etc.). Collection of these data is critical in assessing accountability for the grant program. These data also serve as the primary source of information for OSEP to target program areas in need of improvement.

A3. Use of Technology to Reduce Burden

OSEP collects all data in a web-based data collection system which is maintained on a secured server. Grantees and scholars log into the PDPDCS using their email address and a password to enter data. Employers are provided secure links to review and verify employment. The system is designed to minimize burden on respondents by programmatically skipping inapplicable items and storing and displaying data previously entered. For many items, users simply review data previously entered and verify its continued accuracy. The data collection instruments and frequently asked questions will be available online to respondents.

A4. Efforts to Identify Duplication

There is no duplication of reporting efforts. The information requested for this reporting is not collected or reported elsewhere. Data to determine whether a school is “high-need” is not collected from any respondents to reduce burden. These demographic data are gathered from ED’s Common Core of Data by the contractor. Determining a “high-need” school is necessary to calculate the performance measure on the number and percentage of scholars who complete the program and who are employed in high-need schools.

A5. Methods to Minimize Burden on Small Entities

The information requested rarely involves the collection of information from small businesses. There may be some employers classified as small businesses; however, the Employment Verification Record was designed to solicit only the information necessary

to respond to program requirements. Thus, the burden of reporting is minimized to only those elements necessary to meet Federal requirements for budget and program activity data. In addition, this system utilizes a secure online tracking system which allows employers to easily review information already entered by the scholar and then submit verification or provide revisions.

A6. Consequences of Not Collecting Data

Scholar follow-up is necessary for the program office to monitor service obligation requirements. To require less frequent data collection would result in the inability of the Secretary to assure that grantees and scholars are complying with the statutory requirements for service obligation. In addition, these data are needed annually so that OSEP can meet its PDP annual program performance measure reporting requirements under GPRA.

A7. Special Circumstances

There are no special circumstances that would require the collection to be conducted in a manner inconsistent with OMB guidelines.

A8. Federal Register Comments and Persons Consulted Outside the Agency

Information Collection 1820-0686 was placed in the Federal Register for a 60-and 30-day public comment period, receiving two public comments during the 60-day comment period. These comments addressed below and attached.

The Special Education—Individual Reporting on Regulatory Compliance Related to the Personnel Development Program’s Service Obligation and the Government Performance and Results Act of 1993 (GPRA), SORN 18-16-04, 73 FR 63453-63457, was published in the Federal Register on October 24, 2008.

OSEP provides training on data collection quality at least annually to grantees who receive funds under Personnel Development to Improve Services and Results for Children with Disabilities, CFDA No. 84.325. In addition, suggestions from grantees and scholars provided to OSEP and its contractors over the past two and a half years were used to clarify questions and response options on the survey instruments.

During the comment period, OSEP received two comments. This paragraph includes the comments, ED’s response to the comments, and changes to the collection, if any, as a result of the comments received.

- 1) Comment: ED should save the paper; the information will be available in alternative format.

ED Response: All forms will be available electronically in the web-based data collection system.

Changes: No changes.

- 2) Comment: The commenter commends the Department for efficiently and effectively collecting these data through revisions that will reduce the grantee and scholar work burden.

ED Response: We agree with the commenter.

Changes: No changes.

A9. Payments or Gifts

There are no payments or gifts to respondents in support of the data collection.

A10. Assurances of Confidentiality

All data collection activities will be conducted in full compliance with ED regulations. Data collection activities will be conducted in compliance with The Privacy Act of 1974, P.L. 93-579, 5 USC 552 a; the "Buckley Amendment," Family Educational and Privacy Act of 1974, 20 USC 1232 g; and related regulations, including but not limited to: 41 CFR Part 1-1 and 45 CFR Part 5b and, as appropriate, the Federal common rule or ED's final regulations on the protection of human research participants. This is to maintain the confidentiality of data obtained on private persons and to protect the rights and welfare of human research subjects as contained in ED regulations. The Privacy Impact Assessment (PIA) for the Personnel Development Program Data Collection System, was published on June 1, 2014. In accordance with the Privacy Act of 1974, a system of records (SORN) entitled Special Education--Individual Reporting on Regulatory Compliance Related to the Personnel Development Program's Service Obligation and the Government Performance and Results Act of 1993 (GPRA)" (18-16-04) was published on October 24, 2008. A revised SORN and PIA will be published once OMB has approved the updated data collection instruments.

Project staff and contractors will adhere to the regulations and laws regarding the confidentiality of individually identifiable information. In addition, the Personnel Development Program Data Collection System was reviewed by ED's Office of the Chief Information Officer (OCIO) for compliance with the Federal Information Security Management Act (FISMA), OMB Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance. The system most recently received an Authorization to Operate (ATO) on November 10, 2016.

A11. Justification of Sensitive Questions

Questions regarding Social Security Number (SSN), employment status, and service obligation status may be considered sensitive. However, SSN, employment and service obligation status questions are necessary to directly respond to GPRA measures and program requirements for service obligation. In addition, the Accounts Receivable and Bank Management Group (ARBMG) and the Department of Treasury require SSNs

when scholars are referred, because they did not repay their service obligation through eligible employment and must, therefore, repay part or all of the funding they have received.

Race/ethnicity data are also collected. The IDEA 2004 emphasizes that the training of professionals in the area of special education by minority individuals is essential if the nation is to obtain greater success in the education of minority children with disabilities (Section 601(10)(D)). Collecting these data will assist in analyzing and increasing the number of minorities trained in special education.

A12. Estimates of Hour Burden

Three different sources—the grantees, scholars and employers—will be asked to report or verify information about the scholar. The time taken by a scholar to complete the Scholar Training and Employment Record will vary based on the individual’s employment. The approximate time required for grantees to complete the Scholar Record and for employers to complete the Employment Verification Record will not vary widely. For all respondents, much of the information in these forms are pre-populated and require only verification.

Table A-1 presents the **maximum** annual burden estimates of 11,313 hours for grantees, scholars, and employers. The program office estimates that 348 active grantees, 15,213 scholars, and 15,213 employers will respond to this collection. Given that scholars and employers are only able to submit and verify employment information once a scholar has completed one academic year of the training program, it is possible that not all scholars/employers in the counts below will respond in any given year; however, for the purposes of estimating burden, we assume that all of the 15,213 scholars will be employed. The actual number of grantees, scholars and employers may vary due to the availability of Federal appropriations, number of grant awards made, and the number of scholars recruited by each project. This is our best estimate taking these variables into consideration.

For burden estimates, we assume that grantee administrators and employers have an hourly rate of \$50. We assume an average hourly rate of \$24.69 for scholars, understanding that some scholars may not yet be employed, some may be earning more as administrators, and some may be earning less as teachers or while in deferment. Given these rates and the hour estimates above, the maximum estimated annual burden is \$440,306 across all grantees, scholars, and employers. Below we describe how these estimates were derived for each instrument.

Grantees: Scholar Record

We estimate that 348 grantees will respond to this data collection instrument annually. The burden for grantees of completing the Scholar Record is estimated at 9 hours per grantee per year. We estimate that the grantee will spend an average of 25 minutes per scholar entering and updating information each year. On average, each grantee enrolls 22

scholars. In many cases, the grantee will be reviewing and updating information already entered.

Grantees: Pre-Scholarship Agreement

The Pre-Scholarship Agreement is completed only once per scholar per grant. These agreements are completed and signed at the time the scholar enrolls in the grant-supported training. Grant project directors usually present information about their programs and explain the agreement during their program orientations. Therefore, project directors generally conduct these sessions in groups rather than individually. These sessions are estimated to take 30 minutes to ensure scholars are well informed about the nature of the agreement.

Our estimate is based on the assumption that grantees meet with scholars in groups of five to explain the agreement, answer questions, and complete and sign the agreement with the scholars. Because the agreement is only completed prior to the start of training, grantees primarily conduct this activity in the first and second years of their grant. We estimate that 120 grants need to conduct this activity annually with an average of 11 scholars per grant, or approximately 2 times per year. Our estimate is based on roughly 50 to 60 grant awards being made in each fiscal year and an average of 22 total scholars enrolled in each grant over the course of the first two years of the grant.

Grantees: Exit Certification

The Exit Certification is completed only once per scholar per grant. The exit certifications are completed and signed when a scholar completes the grant training program or exits prior to completion. Grant project directors complete these agreements one-on-one with the scholars, and it takes approximately 15 minutes to review, complete and sign the agreement.

There are currently 348 active grants that have enrolled scholars who will eventually exit. Again, because we report the maximum burden, we averaged the number of completers per grant over the last three years.

Scholars: Scholar Training and Employment Record

Scholars can log into the system and begin to verify and update their contact and training information as soon as they are enrolled in the program and submitted by the grantee in the system. Per program regulations, scholars may begin fulfilling their service obligation through eligible employment after they have completed one full-time academic year of the program. The number of scholars entering data in any given project year will vary, but may be as many as 15,213 scholars across all grants. There are currently 15,213 submitted scholars in the database who have yet to fulfill their service obligation. We anticipate that scholar burden will average 15 minutes per year.

Scholars: Pre-Scholarship Agreement

As noted above under the Grantee: Pre-Scholarship Agreement, the Pre-Scholarship Agreement is completed and signed only once per scholar per grant. Each scholar will participate in an information session with his/her project director to discuss, complete and sign the agreement. We estimate that these sessions will last roughly 30 minutes. These agreements are completed when the scholars begin their programs. We estimate that roughly 11 scholars in 120 grants will conduct this activity annually. Our estimate is based on 50 to 60 grant awards being made in each fiscal year and an average of 22 new scholars enrolled in each grant over the course of the first two years of the grant.

Scholars: Exit Certification

As noted above under the Grantee: Exit Certification, the Exit Certification is completed only once per scholar per grant. Each scholar will meet with his or her project director at the time he or she completes the program or leaves prior to completion. We estimate that it will take 15 minutes for each scholar to review, discuss, complete, and sign the Exit Certifications. To calculate the annual number of scholars who would need to complete the Exit Certifications, we averaged the number of scholars who completed or exited prior to completion from FY 2011- FY 2013.

Employers: Employment Verification Record

For employers, the scholar initiates employment verification annually; however, some scholars: a) exercise their allowable grace period; b) do not stay employed in education; or c) enter deferment due to an approved reason. Therefore, the number of employers asked to provide verification may be lower than the number of scholars that completed one academic year of the PDP training grants. We anticipate the employers' burden to be 10 minutes per scholar per year.

Table A-1. Maximum Annual Burden Estimates, by Data Source

Data Source (Frequency)	Estimated Number of Respondents	Estimated Annual Burden per Respondent (in Hours)	Estimated Annual Burden (in Hours)	Estimated Total Annual Cost (in Dollars)
Grantees: Scholar Record (Annual)	348 grantees	9	3,132	\$156,600 ¹
Grantees: Pre-Scholarship Agreement (Once per scholar/grant; conducted in groups of five scholars)	120 grantees (11 scholars enrolled/yr)	1	120	\$6,000 ¹
Grantees: Exit	348 grantees (6	1.5	522	\$26,100 ¹

Certification (Once per scholar/grant)	completers/yr)			
Scholars: Scholar Training and Employment Record (Annual)	15,213 scholars	0.25	3,803	\$93,896 ²
Scholars: Pre-Scholarship Agreement (Once per grant)	1,320 scholars	0.5	660	\$16,295 ²
Scholars: Exit Certification (Once per grant)	1,961 scholars	0.25	490	\$12,104 ²
Employers: Employment Verification Record(Annual)	15,213 employers ³	0.17	2,586	\$129,311 ¹
Totals	34,523	12.67	11,313	\$440,306

¹ Based on an estimated hourly rate of \$50 for grantee administrators and principals/LEA representatives.

² Based on an estimated average hourly rate of \$24.69 for scholars.

³ Assumes that all scholars are employed.

A13. Estimate of Cost Burden to Respondents

We do not anticipate additional costs to respondents resulting from this collection other than that already reported in A12, including capital or start-up costs, or operation, maintenance, or purchase of services. It is assumed that all respondents have access to a computer either through the grantee Institution of Higher Education or their place of employment. The data collection contractor maintains a toll-free Help Desk number to allow respondents reliable access to support services. This Help Desk could assist a respondent without reliable access to a computer. Some respondents, depending on the technology used, may bear some cost of the communication (e.g., cell phone or email service costs); however, it is not possible to identify a specific cost given the range in service options.

A14. Estimate of Annual Cost to the Federal Government

The total annual cost to the Federal government reflects the combined costs for OSEP to contract the data collection and reporting tasks and provide management and oversight of that contract (see Table A-2 below).

Table A-2. Total Annual Cost to Federal Government by Type of Cost

Type of Cost	Cost
OSEP Staff (salaries)	\$130,400
Contractor Data and Reporting Services (Fixed price)	\$688,043
Total	\$ 818,443

OSEP has secured a fixed price contract with EPI and Westat to create and manage the online data collection system. The fixed cost for this contract is \$688,043 for Year 5 (September 4, 2016 – September 3, 2017). These costs include the development and maintenance of the system, support for respondents, and preparation of reports. The majority of communications with respondents will be electronic; however, scholars who do not respond to electronic or telephone communications will be sent follow-up letters. The costs for those mailings are included in the contract.

The PDP program office maintains a program specialist (.5 FTE) whose function is to manage the contract and 18 tasks. This program position is a GS-14, which, in 2017, ranges from \$112,021 to \$145,629 in annual salary for the Washington D.C. locality. OSEP staff salaries also include the estimated cost of an additional person (GS-14) assigned to support the contract on, in particular, debt referrals.

A15. Program Changes or Adjustments

There is an adjustment increase of 4923 annual burden hours and an adjustment decrease of -956 respondents, by providing a more accurate estimate the burden provided in this information collection request reflects a more accurate estimate.

A16. Plans for Tabulation and Publication of Results

The data will also be used on an annual basis to report results to ED’s Budget Service for compliance with GPRA and publication in ED’s Budget Justification. A final report will be produced for each fiscal year. This report will include descriptive analyses of all variables collected. The number of scholars and percentages, as well as measures of central tendency when appropriate, will be presented by grant type in table format. The report will also provide data to monitor the fulfillment of scholar service obligation and grantee and scholar compliance with the program regulations. Bulleted text and an executive summary will be provided to highlight key findings. The final report will also include analyses of relationships among variables in the current fiscal year data set as well as comparative analyses of key variables across all data sets. All data will be in an aggregate form to protect PII and no PII information will be published.

Table A-4 below summarizes the data collection and reporting timeline. Respondents will have continuous access to the online data collection system; however, analyses will be conducted on a snapshot of the data to document the previous fiscal year.

Table A-4. Data Collection and Reporting Timeline

Task	Month(s)
Respondents enter data	Ongoing
Snapshot taken of data	April
Draft reports for previous FY	June-July
GPRA reporting for previous FY	July-August
Final report for previous FY	August

A17. Approval to Not Display the OMB Expiration Date

This item is not applicable as the OMB expiration date will be displayed for each respondent type the first time they login or enter the system.

A18. Explanation of Exceptions

There are no exceptions to the certification statement.

SECTION B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

B.1 Collection of Information Employing Statistical Methods

This collection does not use statistical methods due to the three purposes of the proposed data collection. First, data from three sources (grantees, scholars, employers) are necessary to assess the performance of the PDP program on its Government Performance Results Act (GPRA) measures. Second, data from all three sources are necessary to determine if PDP scholars are fulfilling the terms of their service obligation requirements. Finally, budget and project-specific performance data are collected from PDP grantees for project monitoring. These three purposes require actual data collection to ensure accuracy, integrity, and the validity of aggregate data.