

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Integrated Partner Management (IPM) System**

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.

Federal Student Aid (FSA), an office of the U.S. Department of Education (Department) has developed the Integrated Partner Management (IPM) system. IPM is the new solution for application processing and financial reporting, that will replace three (3) legacy application with the following OMB information collection control numbers: Approval to Participate in the Federal Student Aid Programs (1845-0012), Request for Title IV Reimbursement or Heighten Cash Monitoring 2 (HCM2) (1845-0089), and eZ-Audit: Electronic Submission of Financial Statements and Compliance Audits (1845-0072). Consolidation of these applications will improve timeliness, data integrity and Department's analysts' ability to get a comprehensive view from one application as opposed to the current disjointed views across multiple applications.

The new IPM system will include the application for approval for institutions and financial partners (including lenders) to participate in Federal Student Financial Aid programs to comply with the statutory requirements of collecting necessary information under the Higher Education Act of 1965, as amended (HEA). An institution must use the application to apply for approval to be determined eligible and, if the institution wishes to participate, to explain its eligibility or continue to participate in the Title IV Programs. The institutions must also use the application to report certain required data as part of its recordkeeping requirements contained in the regulations under 34 CFR part 600 titled Institutional Eligibility under the Higher Education Act of 1965, as amended.

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

Listed below are the some of the circumstances that require an institution to utilize the new IPM to contact the Department of Education :

- An eligibility determination and, if requested, certification to participate;
- Continued eligibility to participate;
- Reporting changes made to the institution, as required; and
- Expansion of its current approval.

In order to gain and keep their eligibility current, the institutions and financial partners participating in the Title IV HEA programs are required to submit audited financial statements and compliance audits that are prepared in accordance with Generally Accepted Accounting Principles (GAAP), Generally Accepted Auditing Standards (GAAS), and Generally Accepted Government Auditing Standards (GAGAS). An institution is required to submit audits annually (34 CFR 668.23), and whenever it seeks to begin or continue participating in the Title IV HEA programs (34 CFR 660.20(a) or (b)), undergoes a change in ownership that results in a change in control (34 CFR 600.20(g)), or ceases to participate in the programs (34 CFR 668.26(b)).

IPM will make significant advances to both partners and FSA analysts in the process used for providing oversight to FSA partners in the Title IV and improvements in the tools and technologies currently in place. IPM will transition a process that is currently heavily paper based to an easy to navigate, automated workflow process. IPM will put in place a solution that will eliminate the need for partners to submit paper copies of the materials currently used to substantiate their eligibility to participate in Title IV programs and support the oversight processes. The elimination of these paper documents will also facilitate the routing of case work and the ability of analysts to retrieve, mark, document comments, and route case materials.

Under the IPM system the institutions log into a secure Department website, enter information pertaining to their eligibility, audit and finances and attach electronic documents to support eligibility, audit and financial statement submissions.

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.

School Eligibility Service Group (SESG) (an office within FSA) reviews and analyzes the information reported on the application and makes a determination on the institution's request. SESG will use the information supplied through IPM to determine whether an institution has submitted its audits within the required timeframes, to make a preliminary determination as to whether an institution satisfies the financial responsibility standards in 34 CFR part 668, Subpart L of the Student Assistance General Provisions regulations, and to otherwise monitor an institution's compliance with Title IV program requirements. The information in the IPM system is also used to assess whether the audits from an institution are materially complete and conducted in accordance with applicable standards.

SESG's decision is based not only on the information reported by the institution on the application, but also on other information in its possession. SESG makes its decision using a case team approach to its work processes. This allows SESG to evaluate a school based on a total picture of integrated institutional information.

SESG's decision includes determining that the institution is:

- Designated an eligible institution;
- Certified or recertified to participate in Title IV programs;
- Approved, for Title IV purpose, to expand its current approval (new location or programs, etc.);
- In compliance with the required reported requirements (name changes, address changes, etc.); or
- Notified that its request is denied.

The information in the IPM system is also used by the Department to maintain a database of eligible and non-eligible lenders and to ensure compliance with Federal Regulations requiring lenders, guaranty agencies, and servicers to submit annual compliance audits and, in some cases, financial statements.

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 main goal of the IPM system is the modernization and integration of the partner management operations of FSA's business and to deliver significant improvement in managing partner interactions and support. The partner management functions include eligibility, enrollment and oversight processes. The implementation of IPM will help reduce the risk of failure by older legacy systems that are currently at the end of their life cycle.

IPM will incorporate support tools such as document management, workflow management, and risk management; offer web-enabled access, working in tandem with Security Architecture (SA) and the Enterprise Service Bus (ESB).

IPM will be built using the SharePoint 2010 platform. This is a move to a new portal technology that is much simpler to maintain and deploy new products on, as well as being significantly cheaper than the portal product FSA was previously using. SharePoint provides not only for portal functionality but increased opportunities for collaboration features among FSA analysts as well as between FSA analysts and our partners.

Many of the questions on the application are pre-populated using information the institution submitted on its previous application. Pre-populating the answers to the questions alleviates the need for the institution to enter a response to every question. Instead, the institution only needs to review the information and, if necessary, update it.

The IPM system has additional features such as:

- Ability to reset their passwords in case of a forgotten or an expired password.
- Home page that informs the partner about their upcoming tasks, provide access to previously entered information, ability to view the previously uploaded documents, view previously received notifications.
- Navigating the partner to the correct set of questions based on the responses provided.
- Skip logic that automatically skips questions or a section if it does not apply to the institution;

- Edits that ensures the institution does not miss a required question or enter the wrong type of information;
- Help text for each of the question.
- Ability to skip uploading the documents if the previously uploaded documents are valid and applicable.
- eSign the application attesting that the information entered is correct to the best of their knowledge.
- Affiliate themselves with other partners they are associated with.
- Department contacts, both phone numbers and e-mail address. The partner can communicate with the Department through their portal.

The System of Record Notice for this new information collection is pending approval and will be recorded with this collection when finalized.

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.

There is no duplication of records that an institution must maintain. Institution will not have provided similar information to any other office in the Department. A continuing institution may have provided similar information as part of the Integrated Postsecondary Education Data System survey, but it is not the same. The IPM system will provide a single source for institutions to provide the required documentation to establish and maintain eligibility, thus reducing the possibility of duplication of effort by the institution through the previous three individual systems.

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 information collection does not impact 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 statute provides that the Secretary may provisionally certify new institutions, institutions that change ownership, and institutions with questionable financial responsibility and administrative capability for a period of time from one to three years. The Department uses this tool to allow for increased monitoring of institutions with no track record and institutions with documented problems. If information were collected less frequently, the Department would not be in compliance with the HEA and would not be using the tools Congress provided to improve gatekeeping capability.

While the frequency with which institutions must report certain updates has not changed and cannot, because they are vital pieces of information relative to the institution's eligibility, the reporting burden for those actions is decreased significantly by the implementation of the IPM.

If the collection is not conducted, a new institution would not be able to participate in Title IV programs, a currently approved institution would not be able to participate past its approved expiration date, meet the notification and recordkeeping requirements or be able to expand its eligibility. Further, the Department would lose a valuable gatekeeping tool.

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 information does not meet any of the special circumstances described.

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.

This is a request for a new information collection. This new IPM system will replace the method of collecting the required information to participate in Title IV, HEA financial aid programs. The Department received two comments from the public during the 60 day comment period. Responses to the questions are attached. The Department is now requesting a 30-day public comment period to be published in the Federal Register.

In the development of this new system, hundreds of schools and other interested parties provided their comments over the telephone, by fax, through the mail and on the internet. From this group a smaller number of well-qualified individuals participated in a focus group to work with the Department as it addressed the higher education community's concerns about complexity, length and burden. The application was then reengineered. The goals for the Application were clarity, accuracy and simplicity while still allowing the Department to improve gatekeeping, have a more efficient process, receive more reliable information from the

institution and provide for institutional accountability inherent in the questions.

From that work, the redesign group was successful in producing a valuable tool that asks clear questions that do not put an additional burden on an institution to answer. With minor changes to the Application, the information requested in the attached form seeking OMB approval was in the previous (reengineered) edition of the Application. The Application has been widely accepted by the community and in use since September of 1996.

The Department holds Electronic Access Conferences in the fall. The Application for Approval to Participate in Federal Student Financial Aid Programs is one of the processes featured at these conferences. Responses received from school officials to the Application have been extremely positive. They find the questions in the Application to be clear and the process to complete the application simple.

In addition, Department officials routinely attend state, regional and professional association meetings and conferences. Typically, the Department participates in the types of forums that present an opportunity to receive feedback from the higher education community regarding policies and procedures including the Application and the recertification process. The feedback that has been received has been overwhelmingly positive regarding the application asking clear questions that do not burden the institution.

The Department also receives feedback from the community via telephone calls and e-mails. The Department strives to be responsive to comments and suggestions from the community. For example, while the Department gave particular emphasis to design the electronic Application to be "user friendly", based on feedback from the community, we continue to make changes to improve the electronic flow of the application, which made it even easier to use.

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

The Department does not provide any payment or gift 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.

The information that is being requested is mandated by the Higher Education Act and Title 31 as amended by Section 31001 of Public Law 104-134 of the Debt Collection Improvement Act of 1996.

Section 498A(a)(3) of the HEA requires the Secretary to establish a central database of information on institutional accreditation, eligibility, and certification that include all information available to the Department.

Section 498A(c) instructs the Secretary to make this information available to all institutions of higher education, guaranty agencies, states, and other organizations participating in the programs authorized under Title IV of the HEA. Therefore, ED cannot make any assurances of confidentiality to respondents.

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 ask questions of a sensitive nature.

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)

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.

This is a request for a new information collection. The consolidation of three separate information collections creates a single simplified application process for institutions of higher education that need to establish, renew, or make changes to their eligibility to participate in the Title IV, HEA financial aid programs as well as provide required audit information. Once this new collection is approved the Department will retain the 3 legacy systems for a short period before requesting discontinuation of the previously identified information collections.

INITIAL Application:

Initial Purpose Applications Based on Partner Type	Hours Required to Collect and Report	Number of applications reported annually = Respondent/ Responses	Total Number of Hours
Domestic For Profit	10	50	500
Domestic Non Profit	10	50	500
Domestic Public	10	60	600
Foreign Public	15	20	300
Foreign For Profit	15	10	150
Foreign Non Profit	15	10	150
Foreign Public with Med	17	2	34
Foreign Public with Vet	16	2	32
Foreign Public with Nursing	16	2	32
Foreign For Profit with Med	17	2	34
Foreign For Profit with Vet	16	2	32
Foreign For Profit with Nursing	16	2	32
Foreign Non Profit with Med	17	2	34
Foreign Non Profit with Vet	16	2	32
Foreign Non Profit with Nursing	16	2	32
Lender	3.5	50	175
Guaranty Agency	1	50	50
Total		318	2,719

RECERTIFICATION Application:

Recertification Purpose Applications Based on Partner Type	Hours Required to Collect and Report	Number of applications reported annually = Respondent/ Responses	Total Number of Hours
Domestic For Profit	3	50	150
Domestic Non Profit	3	50	150
Domestic Public	3	50	150
Foreign Public	4	25	100
Foreign For Profit	4	25	100
Foreign Non Profit	4	25	100
Foreign Public with Med	4	10	40
Foreign Public with Vet	4	10	40
Foreign Public with Nursing	4	5	20
Foreign For Profit with Med	4	10	40
Foreign For Profit with Vet	4	10	40
Foreign For Profit with Nursing	4	5	20
Foreign Non Profit with Med	4	10	40
Foreign Non Profit with Vet	4	10	40
Foreign Non Profit with Nursing	4	5	20
Lender	2	100	200
Total		400	1,250

MERGER/CIO Application:

Merger/ CIO Purpose Applications Based on Partner Type	Hours Required to Collect and Report	Number of applications reported annually = Respondent/ Responses	Total Number of Hours
Domestic For Profit	5	5	25
Domestic Non Profit	5	5	25
Domestic Public	5	5	25
Foreign Public	5	5	25
Foreign For Profit	5	5	25
Foreign Non Profit	5	5	25
Foreign Public with Med	5	2	10
Foreign Public with Vet	5	1	5
Foreign Public with Nursing	5	1	5
Foreign For Profit with Med	5	2	10
Foreign For Profit with Vet	5	1	5
Foreign For Profit with Nursing	5	1	5
Foreign Non Profit with Med	5	2	10
Foreign Non Profit with Vet	5	1	5
Foreign Non Profit with Nursing	5	1	5
Lender Reassignment	2	10	20
Total		52	230

UPDATE Application:

Update Purpose Applications Based on Partner Type	Hours Required to Collect and Report	Number of applications reported annually = Respondent/ Responses	Total Number of Hours
Domestic For Profit	0.5	500	250
Domestic Non Profit	0.5	500	250
Domestic Public	0.5	500	250
Foreign Public	0.5	200	100
Foreign For Profit	0.5	200	100
Foreign Non Profit	0.5	200	100
Foreign Public with Med	0.5	20	10
Foreign Public with Vet	0.5	20	10
Foreign Public with Nursing	0.5	10	5
Foreign For Profit with Med	0.5	20	10
Foreign For Profit with Vet	0.5	20	10
Foreign For Profit with Nursing	0.5	10	5
Foreign Non Profit with Med	0.5	20	10
Foreign Non Profit with Vet	0.5	20	10
Foreign Non Profit with Nursing	0.5	10	5
Lender	0.5	50	25
Total		2,300	1,150

Annual Financial and Audit Submissions

Annual Financial and Audit Submissions based on Partner type	Burden Hours Estimates for Completing the Input Screen	Number of applications reported annually = Respondent/ Responses	Total Number of Hours
For Profit	27 minutes	2,000	1,023
Non Profit	27 minutes	1,900	918
Public	16 minutes	2,200	550
Lender	1 hour	50	50
Total		6,150	2,541

Affected Entity	Respondents	Responses	Total Number of New Burden Hours
For Profit	3,190	3,190	3,036
Non Profit	2,830	2,830	2,461
Public	3,200	3,200	2,393
Grand Total	9,220	9,220	7,890

INITIAL Application - Costs

Initial Purpose Applications Based on Partner Type	Hours Required to Collect and Report	Senior Administrator Hours	Cost Burden at \$70/hour	Professional Staff Hours	Cost Burden at \$30 per Hour	Total Cost Burden per Institution
Domestic For Profit	10	0.5	35	9.5	285	320
Domestic Non Profit	10	0.5	35	9.5	285	320
Domestic Public	10	0.5	35	9.5	285	320
Foreign Public	15	0.5	35	14.5	435	470
Foreign For Profit	15	0.5	35	14.5	435	470
Foreign Non Profit	15	0.5	35	14.5	435	470
Foreign Public with Med	17	0.5	35	16.5	495	530
Foreign Public with Vet	16	0.5	35	15.5	465	500
Foreign Public with Nursing	16	0.5	35	15.5	465	500
Foreign For Profit with Med	17	0.5	35	16.5	495	530
Foreign For Profit with Vet	16	0.5	35	15.5	465	500
Foreign For Profit with Nursing	16	0.5	35	15.5	465	500
Foreign Non Profit with Med	17	0.5	35	16.5	495	530
Foreign Non Profit with Vet	16	0.5	35	15.5	465	500
Foreign Non Profit with Nursing	16	0.5	35	15.5	465	500
Lender	3.5	0.5	35	3	90	125
Guaranty Agency	1	0	0	1	30	30
Total						7,115

RECERTIFICATION Application - Costs

Recertification Purpose Applications Based on Partner Type	Hours Required to Collect and Report	Senior Administrat or Hours	Cost Burden at \$70/hour	Profession al Staff Hours	Cost Burden at \$30 per Hour	Total Cost Burden
Domestic For Profit	3	0.5	35	2.5	75	110
Domestic Non Profit	3	0.5	35	2.5	75	110
Domestic Public	3	0.5	35	2.5	75	110
Foreign Public	4	0.5	35	3.5	105	140
Foreign For Profit	4	0.5	35	3.5	105	140
Foreign Non Profit	4	0.5	35	3.5	105	140
Foreign Public with Med	4	0.5	35	3.5	105	140
Foreign Public with Vet	4	0.5	35	3.5	105	140
Foreign Public with Nursing	4	0.5	35	3.5	105	140
Foreign For Profit with Med	4	0.5	35	3.5	105	140
Foreign For Profit with Vet	4	0.5	35	3.5	105	140
Foreign For Profit with Nursing	4	0.5	35	3.5	105	140
Foreign Non Profit with Med	4	0.5	35	3.5	105	140
Foreign Non Profit with Vet	4	0.5	35	3.5	105	140
Foreign Non Profit with	4	0.5	35	3.5	105	140

Tracking and OMB Number: (XXXX) 1845-NEW
RIN Number: XXXX-XXXX (if applicable)

Revised: 04/27/2017

Nursing					5	
Lender	2	0.5	35	1.5	45	80
Total						1,950

MERGER/CIO Application - Costs

Merger/ CIO Purpose Applications Based on Partner Type	Hours Required to Collect and Report	Senior Administrat or Hours	Cost Burden at \$70/hour	Profession al Staff Hours	Cost Burden at \$30 per Hour	Total Cost Burden
Domestic For Profit	5	0.5	35	4.5	135	170
Domestic Non Profit	5	0.5	35	4.5	135	170
Domestic Public	5	0.5	35	4.5	135	170
Foreign Public	5	0.5	35	4.5	135	170
Foreign For Profit	5	0.5	35	4.5	135	170
Foreign Non Profit	5	0.5	35	4.5	135	170
Foreign Public with Med	5	0.5	35	4.5	135	170
Foreign Public with Vet	5	0.5	35	4.5	135	170
Foreign Public with Nursing	5	0.5	35	4.5	135	170
Foreign For Profit with Med	5	0.5	35	4.5	135	170
Foreign For Profit with Vet	5	0.5	35	4.5	135	170
Foreign For Profit with Nursing	5	0.5	35	4.5	135	170
Foreign Non Profit with Med	5	0.5	35	4.5	135	170
Foreign Non Profit with Vet	5	0.5	35	4.5	135	170

Tracking and OMB Number: (XXXX) 1845-NEW
RIN Number: XXXX-XXXX (if applicable)

Revised: 04/27/2017

					5	
Foreign Non Profit with Nursing	5	0.5	35	4.5	135	170
Lender Reassignment	2	0.5	35	1.5	45	80
Total						2,630

UPDATE Application - Costs

Update Purpose Applications Based on Partner Type	Hours Required to Collect and Report	Cost Burden at \$30 per Hour	Total Cost Burden
Domestic For Profit	0.5	15	15
Domestic Non Profit	0.5	15	15
Domestic Public	0.5	15	15
Foreign Public	0.5	15	15
Foreign For Profit	0.5	15	15
Foreign Non Profit	0.5	15	15
Foreign Public with Med	0.5	15	15
Foreign Public with Vet	0.5	15	15
Foreign Public with Nursing	0.5	15	15
Foreign For Profit with Med	0.5	15	15
Foreign For Profit with Vet	0.5	15	15
Foreign For Profit with Nursing	0.5	15	15
Foreign Non Profit with Med	0.5	15	15
Foreign Non Profit with Vet	0.5	15	15
Foreign Non Profit with Nursing	0.5	15	15
Lender	0.5	15	15
Total			240

Annual Financial and Audit Submissions - Costs

Annual Submissions based on Partner type	Hours Required to Collect and Report	Senior Administrator Hours	Cost Burden at \$70/hour	Professional Staff Hours	Cost Burden at \$30 per Hour	Total Cost Burden
Domestic For Profit	1	0.5	35	0.5	15	7500
Domestic Non Profit	1	0.5	35	0.5	15	7500
Domestic Public	1	0.5	35	0.5	15	7500
Foreign Public	1	0.5	35	0.5	15	5000
Foreign For Profit	1	0.5	35	0.5	15	5000
Foreign Non Profit	1	0.5	35	0.5	15	2500
Lender	1	0.5	35	0.5	15	2500
Total						37,500

Other type of Applications - Costs

Other Type of Applications	Hours Required to Collect and Report	Senior Administrator Hours	Cost Burden at \$70/hour	Professional Staff Hours	Cost Burden at \$30 per Hour	Total Cost Burden
Other type of Lender Submissions (Withdrawal, Merger)	1	0	0	1	30	340
Other type of FSCA Submissions (close out, Exemption, Multi Year Compliance Audit submission)	1	0	0	1	30	340
Total						680

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 is no new capital start-up or operational cost burden to respondents or record-keepers resulting from the information collection other than that shown in items 12 and 14.

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.

Type of Application	Number of Institutions reporting Annually	Hours required for Department review	Total Hours	Average Hourly Rate	Cost involved
Domestic Initial	160	2	100	34	3,400
Foreign Initial	58	2	100	34	3,400
Domestic Recertification	150	2	300	34	10,200
Foreign Recertification	150	3	300	34	10,200
Domestic Merger/ CIO	15	2	50	34	1,700
Foreign Merger/ CIO	27	2	50	34	1,700
Domestic Updates	1,500	0.5	125	34	4,250
Foreign Updates	750	0.5	125	34	4,250
Lender Initial	50	1	50	34	1,700
Lender Recertification	100	1	300	34	10,200
Other Lender Applications	110	1	200	34	6,800

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 a new information collection based on a program change. With the Department is combining the functions of 3 current systems and there will be a single location for institutions to access reporting systems, we are anticipating a reduction in burden for institutions. We anticipate the burden to the 9,220 affected entities will total 7,890 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.

Application information is not expected to 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.

Tracking and OMB Number: (XXXX) 1845-NEW
RIN Number: XXXX-XXXX (if applicable)

Revised: 04/27/2017

The Department has and will continue to display on the form, the expiration date for the OMB approval as required.

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

There are no exceptions to the certification statement.