

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
OMB Number: 1845-NEW
Work Colleges Application**

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A. Justification

1. Explain the circumstances that make the collection of information necessary.

Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section¹. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

The Higher Education Opportunity Act, Pub. L. 110-315, established the allocation of Federal Work Study funds to recognize, encourage, and promote the use of comprehensive work-learning service programs as part of a financial plan which decreases reliance on grants and loans. The Work Colleges Program is one of the three Federal Work-Study Programs. The other two Federal Work-Study Programs are the Federal Work-Study (FWS) Program and the Job Location and Development (JLD) Program.

The Department has been collecting the data required to participate in the Work Colleges Program since the inception of the program. However, until the 2016-2017 award year, there were only a total of seven (7) participating institutions. There are now nine (9) participating institutions with the expectation of additional applications. Therefore, in preparation for expanding the numbers of participants to 10 an OMB-approved form is required. The data has been collected electronically through a module in the eCampus-Based system at <http://cbfisap.ed.gov>. During 2017-2018 award year, the Campus-Based processing system is transitioning to the Common Origination and Disbursement system. For the 2017-2018 reporting period, respondents will access this expenditure report at <https://cod.ed.gov>.

The participants are required to apply initially and once approved and participating, must reapply annually. The data collected is used by the Department to certify the Work Colleges agreement and collect the request for funding amount and the anticipated number of students for the year. The data is used in conjunction with institutional program reviews to assess the administrative capability and compliance of the applicant. There are no other resources for collecting this data. Sections of the Higher Education Act of 1965, as amended, that govern these programs can be found at <http://www2.ed.gov/about/offices/list/ope/library.html>.

The legislative authority governing the application for the distribution of these funds is: Work Colleges 42 U.S.C. 2756b.

The legislative authority governing the annual report on the uses made of funds provided under the previous section is 42 U.S.C. 2756b and in regulation at 34 CFR 675.41(b).

2. Indicate how, by whom, and for what purpose the information is to be used.

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

Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This is a new collection. The application has been in prior use but was not required to have OMB clearance due to fewer than 10 affected parties taking part in the Work Colleges program. In anticipation of an increase in participation we are submitting this form for clearance under a new information collection. The data reported reflects the certification of the Work Colleges agreement, the amount of funds requested, and the number of students anticipated in the program at each institution. In addition, the data will be used in conjunction with institutional program reviews to help assess the administrative capability of the applicant and enforce compliance.

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.

For the 2017-2018 reporting period, the data will be submitted electronically through the Campus-Based system at <https://cod.ed.gov>.

The data for this collection has been collected electronically from the inception of the electronic Campus-Based system (eCB). This process lessened the burden of those schools submitting the information and allowed for improved record keeping by the Department. As noted above in item 1 the eCB system is transitioning to the COD system. This data collection will be seamless in the transition and continue as before the transition.

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 data. The data is not collected in any other system or format.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

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

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

Also describe any technical or legal obstacles to reducing burden.

If the collection were done less frequently, reporting requirements for this specific program would not be met.

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 related to this collection.

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The data is requested from participating institutions with approved programs. A sixty-day public comment notice was published in the Federal Register on December 14, 2017, pages 58798-58799. One comment was received, however it did not pertain to this collection. This is the request for the 30-day Federal Register Notices to be published to allow public comment.

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

There are no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.² If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

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

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This collection does not include information of a sensitive nature.

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

The statement should:

- 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

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)

explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)*
- *Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.*

There are a total of 10 respondents anticipated.. Federal Student Aid has done everything possible to reduce the burden.

	Est. No. of Respondents	Est. Avg. Person Hours per Respondent - Reporting	Est. Avg. Person Hours per Respondent - Record Keeping	Total Hours
Public Institutions	10	1	1	20
Proprietary Institutions	0	0	0	0
Private Institutions	0	0	0	0
Total	10	1	1	20
		Average Salary of Respondents		Total Salary Cost of all Respondents
		\$28.71 per hour		\$574 (Total hours x Salary)

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

(Do not include the cost of any hour burden shown in Items 12 and 14.)

- *The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating,*

maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.

- *If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.*
- *Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12*

<i>Total Annualized Capital/Startup Cost</i>	<i>:</i>	<i>\$0</i>
<i>Total Annual Costs (O&M)</i>	<i>:</i>	<i>\$0</i>

Total Annualized Costs Requested : \$0

The nature of business for the participating institutions is such that purchases of equipment and provision of services that are required for completion of their expenditure submissions are a part of their customary and usual business practice. They are the type of equipment and services normally necessary to successfully operate any institution of higher education. Therefore, no special equipment or services are required for providing data.

14. Provide estimates of annualized cost to the Federal government.

Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

A total of 8.25 FTEs process all Campus-Based data, forms and materials annually at an average cost of \$874,579 equating to an average hourly cost of \$50.97.

Oversight and processing of this form requires staff 80 hours for a total annual cost to the government of \$4,077.29.

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 to establish a new OMB form/ data collection for an existing process that has an expanding number of participants. This establishes the burden to participating institutions. The annual reporting and record keeping hour burden has not changed from the current estimated inventory of 2 hours per respondent. The anticipated total burden for the new collection is 20 hours for 10 respondents providing a single response.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used.

Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This information collected is not collected for statistical publication.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Department is not seeking this approval.

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

There are no exceptions to the certification statement.