

**SUPPORTING STATEMENT**  
**FOR PAPERWORK REDUCTION ACT SUBMISSION**  
**Gainful Employment Disclosure Template**

**A. Justification**

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section<sup>1</sup>. 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.

Current 34 CFR 668.6(b) specifies disclosure requirements for programs that prepare students for gainful employment in a recognized occupation (the “current disclosure requirements”). These disclosures are made by institutions using a disclosure template provided by the Secretary and approved by OMB under control number 1845-0107. As part of the Gainful Employment final regulations published in the Federal Register on October 31, 2014 (79 FR 64890), as corrected on December 4, 2014 (79 FR 71957) (Final Regulations) we added to §668.6 a new paragraph (d) that provides that institutions are not required to comply with the provisions of §668.6, including paragraph (b), after December 31, 2016. We also established new disclosure requirements in §668.412 with which institutions must comply beginning January 1, 2017 (the “new disclosure requirements”).

Under the new disclosure requirements, an institution must provide current and prospective students with information about each of its programs that prepares students for gainful employment in a recognized occupation (GE programs) using a disclosure template provided by the Secretary. The Secretary must specify the information to be included on the disclosure template in a notice published in the Federal Register.

The Department is requesting that burden currently calculated for 1845-0107 be discharged and transfer the burden already calculated for §668.412 regarding the GE disclosure requirements from 1845-0123 to this information collection. This request revises the current information collection for the disclosure template to reflect the new disclosure requirements and provides notice of the information that institutions must disclose.

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<sup>1</sup> Please limit pasted text to no longer than 3 paragraphs.

Section 668 - Subpart Q – General - §668.412 – Disclosure requirements for GE programs.

Current Disclosure Requirements: Under the current disclosure requirements, institutions must disclose on disclosure template:

- The occupations by names and Standard Occupational Codes (SOC codes) that the program prepares students to enter,
- The on-time graduation rate for students completing the program,
- The tuition and fees it charges students for completing the program within normal time,
- The typical costs for books and supplies and the cost of room and board, if applicable,
- The placement rate for students completing the program,
- The median loan debt incurred by students who completed the program, and
- The percentage of individuals who received a Title IV loan or private loan for enrollment in the program.

Modifications from Current Disclosure Requirements: Under the new disclosure requirements, we retain the above items as required disclosures with revisions to two of the items. These changes are as follows:

Completion Rates: The calculation for the graduation rate—called the “completion rate” in the Final Regulations—will align it with the completion rate methodology under §668.413 of the Final Regulations. Institutions will be required to provide the number of the GE program’s students who began enrollment in a GE program during an award year whose enrollment status was full-time on the first day of the student’s enrollment in the program and the number of those students who completed the program within the program’s normal time to completion. Separately, institutions will also have the option to provide the number of the GE program’s students who began enrollment in a GE program during an award year whose enrollment status was less than full-time on the first day of the student’s enrollment in the program and the number of those students who completed the program within 200 percent time to completion. To calculate completion rate, the template will determine the award year of the enrollment cohort based on the length of the program. The enrollment cohort is the most recent award year after which the normal program length has passed. For example, an institution creating a template for a nine month program (on January 31, 2017) would use an enrollment cohort composed of students who entered the program between July 1, 2014 and June 30, 2015. Defining the enrollment cohort in this way will enable the institution to determine how many of those students completed within 9 months, since at least 9 months have passed since June 30, 2015, the final day of the award year of the enrollment cohort. The resultant rates (to be calculated by the Secretary’s template) that will be disclosed will be the percentage of the students who began the program as a full-time student and who completed the program within the program’s normal time or, for students who began the program as a part-time student, within 200 percent of normal

time. Institutions will no longer be required to disclose a rate based on 150 percent time to completion.

Although the Final Regulations in §668.413 contemplate that any completion rate disclosure would be calculated by the Department, and that the Department would provide the institution with an opportunity to challenge the calculation provided to the institution, the Department is not currently able to process challenges in the manner specified in §668.413. However, we believe it is critical that students have program completion rate information as soon as possible, and requiring institutions to provide the information used to calculate completion rate is the most expedient way to provide these data at this time.

**Median Loan Debt:** Under the current disclosure requirements, an institution must separately disclose the median loan debt incurred by students from Title IV, HEA program loans and the median loan debt from private loans and institutional financing plans. Under the new disclosure requirements, institutions must disclose one median loan debt amount, as well as a monthly payment amount. Median loan debt will be calculated by institutions in accordance with §668.404(d)(1) of the Final Regulations, for students who completed the program during the most recently completed award year, without separating Title IV debt from debt from private loans and from institutional financing plans. Using the median loan debt calculated and provided by the institution, and the interest rate provided by the Department, the template will generate a monthly loan payment amount. The estimated monthly loan payment will assume a 120-month amortization period.

Although the Final Regulations at §668.413 contemplate that any median loan debt disclosure would be calculated by the Department, with an opportunity to challenge the calculation provided to the institution, the Department is not currently able to process challenges in the manner specified. However, we believe it is critical that students have median loan debt information as soon as possible, and requiring institutions to calculate median loan debt, as they do under the current disclosure requirements, is the most expedient way to provide this information.

**New Disclosure Information:** Consistent with the new disclosure requirements in §668.412, the Department adds additional disclosure items to the template that are not required under the current disclosure requirements. Specifically, the new required disclosure items are:

- Whether the program failed the debt-to-earnings (D/E) rates measure as defined in the Final Regulations,
- The median earnings for program graduates as provided by the Department, and
- Information related to state licensure requirements.

These additions to the disclosure template reflect lessons learned from consumer testing and therefore we believe they are very important pieces of information that prospective students need before making a decision to enroll in a GE program. The

detailed requirements for, and the specific rationales underlying, each of these additions are as follows:

**Whether the program failed the D/E rates measure:** Students should know whether a program has failed the D/E rates measure when deciding to enroll in a program or to remain enrolled in a program since a failing rate in any single year could result in a loss of eligibility for Title IV aid in the following year. An institution must disclose this information to current and prospective students within 30 days of receiving a GE program's final D/E rates from the Department in a notice of determination under §668.409 of the Final Regulations. Once an institution has indicated that a program is failing the D/E rates measure on the disclosure template input, the output screen will be prepopulated with the student warnings required under §668.410 of the Final Regulations.

**Graduate Earnings:** The salary prospects of GE program's graduates weigh heavily in students' decisions to enroll in the program. For this reason, the Department has added earnings information to the disclosure template. The Department will provide institutions with the median earnings data used to calculate the final D/E rates for inclusion on the disclosure template.

**Licensure Requirements:** Institutions must disclose whether the GE program meets any applicable State licensure requirements or if completion of the program qualifies graduates to sit for any applicable licensure exam. The disclosure must include information on whether the program does or does not satisfy the applicable educational prerequisites for professional licensure or certification in: (1) each State within the institution's Metropolitan Statistical Area (MSA); and (2) any other State for which the institution has made a determination regarding such requirements. The Department is making this addition because it is essential for students to know whether a program will qualify them for licensure in an occupation that requires licensure.

We do not include in the new disclosure requirements all of the items listed in §668.412 of the Final Regulations as possible disclosure items. The items not currently required include:

- Withdrawal rates
- Completion rates for students who completed a program within 150% of normal time
- Loan repayment rates
- Median loan debt for students who withdrew from the program
- Mean or median earnings for students who withdrew from the program
- Program cohort default rates
- Link to the Department's College Navigator Web site

The Department used consumer testing to determine the disclosure items most salient to current and prospective students. The Secretary may, by notice in the Federal

Register and based on experience or additional consumer testing, change the disclosure items required under the new disclosure requirements.

Complete List of Updated Disclosure Template Items: As discussed above, no later than January 31, 2017 and until such time as the Secretary may otherwise announce in a Federal Register notice, the following disclosure items are required on the GE disclosure template:

- The occupations (by names and SOC codes) that the program prepares students to enter,
- The completion rate for students completing the program within normal time,
- The tuition and fees charged students for completing the program within normal time,
- The total costs for books and supplies, the cost of room and board,
- The placement rate for students completing the program,
- The median loan debt incurred by students who completed the program, as well as the estimated monthly payment amount,
- The percentage of individuals who received a Title IV loan or private loan for enrollment in the program,
- Performance on the D/E rates measure,
- The median earnings for program graduates as calculated under §668.413 of the Final Regulations, and
- Information related to state licensure requirements.

Presentation of Disclosures: Under §668.412 of the Final Regulations, the institution must—

- Provide the disclosure template on its Web site;
- In all GE program promotional materials, include the disclosure template or, under certain circumstances, a link to the disclosure template on its Web site; and
- Directly distribute the disclosure template to prospective students.

An institution that offers a GE program in more than one program length must publish a separate disclosure template for each length of the program. The institution must ensure that each disclosure template clearly identifies the applicable length of the program.

Similarly, an institution that offers a GE program in more than one location or format (e.g., full-time, part-time, accelerated) may publish a separate disclosure template for each location or format if doing so would result in clearer disclosures. An institution that chooses to publish separate disclosure templates for each location or format must ensure that each disclosure template clearly identifies the applicable location or format.

If an institution publishes a separate disclosure template for each length, or for each location or format of the program, the institution must disaggregate, by length of the program, location, or format, the following GE disclosures:

- The occupations (by names and SOC codes) that the program prepares students to enter;
- The completion rate for students completing the program within normal time;
- The tuition and fees charged students for completing the program within normal time;
- The total costs for books and supplies, the cost of room and board;
- The median loan debt incurred by students who completed the program, as well as the estimated monthly payment amount;
- The percentage of students who received a Title IV loan or private loan for enrollment in the program; and
- The information related to state licensure requirements.

Institutions should disaggregate the program's placement rate if disaggregating the placement rate is consistent with the requirements of the institution's state or accreditor. The disaggregated disclosures remain subject to the privacy considerations under §668.412(g).

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.

#### Student Assistance General Provisions:

The Department of Education is responsible for evaluating whether programs are preparing students for gainful employment in a recognized occupation. The information that will be disclosed on the institution's Web site by institutions for each of their GE programs is consistent with the regulations and will inform prospective students of the outcomes of programs that prepare students for gainful employment in a recognized occupation, in order to make enrollment decisions.

The information provided by institutions on the disclosure template is required to be prominently displayed on the institution's Web site to be accessible to prospective students. Institutions will save the disclosure template as the output document provided by the Department and display it on its Web site and any applicable programmatic Web site to insure a consistent look, which will make data comparison much easier and more useful for prospective students.

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.

There are no legal or technical obstacles to the use of technology in this information collection activity.

This disclosure of information involves electronic submission of responses and Web technology through the use of the disclosure template that institutions are required to complete and by providing information to prospective students through an institution's Web site. The disclosure template is hosted online through the Department's Office of Postsecondary Education and permits institutions to electronically submit their responses and receive information such as, but not limited to CIP codes in a drop-down listing for selection, credential level of programs in a drop-down listing for selection, Standard Occupational Codes (SOC codes) in a drop-down listing for selection.

The information in §668.412 that is input by institutions into the disclosure template will not be collected and saved by the Department. Web technology is incorporated into this template consistent with the requirements of §668.412 so institutions can disclose information to students on the institution's Web site. Prospective students will have the ability to compare gainful employment programs at different institutions and to learn what career options are available with each program before enrolling at an institution.

Additionally, the output document will use the [schema.org](http://schema.org) vocabulary, along with the [microdata format](#), to add information to the HTML content that will make it easier for search engine users to locate the information about the programs when searching the Internet.

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.

This information is not duplicated on any other information collection.

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 provisions of §668.412 will not have a significant economic impact on a substantial number of small entities. We have minimized burden on all institutions, including small institutions, by providing a format and some of the required data for the regulatory disclosures as well as a template to present the required information to prospective students.

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 disclosure of information about a gainful employment program on the institution's Web site will provide useful information to prospective students and their families. The intent of the provisions in §668.412 is to enable students to make an informed choice about a gainful employment program by making the disclosures clear, timely, meaningful, and comparable. These disclosures will also allow students to make determinations about the amount of student indebtedness incurred by students who completed the gainful employment program, the average costs of attending the program, rates of normal completion time, and job placement rates.

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 connected 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.

This collection will have both a 60 and 30 day period requesting interested parties to provide comments on the burden calculation for this format. Comments were received during the 60 day public comment period and the Department responses to those comments are provided in a separate document. This is the request for the 30 day public comment period.

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.<sup>2</sup> 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.

There is no personally identifiable information included in the disclosures. There is no assurance of confidentiality provided to institutions for the submission of this information.

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.

There are no questions of a sensitive nature in this application.

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),

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<sup>2</sup> 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)

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.

As stated earlier, with the sunset provision of §668.6(b) to become effective on December 31, 2016, the Department is updating the disclosure template to capture the requirements of §668.412. To ensure that the burden is not overstated, we are requesting that the current burden in 1845-0107 be discharged and the burden from §668.412 in 1845-0123 be transferred to 1845-0107. This will allow the actual template requirements to be collected separately and provide an ease of change to burden requirements as the required elements of the template may change.

	<b># of Respondents</b>	<b># of Responses</b>	<b># Hrs Burden</b>
Current inventory for 1845-0107:	2,611,405	2,645,033	448,152
Remove burden assessed for 1845-0107:	-2,611,405	-2,645,033	-448,152
Resulting burden assessed for 1845-0107:	0	0	0
Transfer of burden inventory for Section 668.412 from 1845-0123:	27,944,411	27,944,411	3,118,160

§668.412 Disclosure Requirements for GE Programs from 1845-0123

Section 668.412 requires institutions to disclose items, using the disclosure template provided by the Secretary. Under §668.412, the Department has flexibility to tailor the disclosure in a way that will be most useful to students and minimize burden to institutions.

The Secretary has conducted consumer testing to determine how to make the disclosures as meaningful as possible. The Secretary will identify which of the regulatory items institutions must include in their disclosures, along with any other information that must be included, and publish those requirements in a notice in the Federal Register.

Institutions must update their GE program disclosure information annually. They must make it prominently available in their promotional materials and make it prominent, readily accessible, clear, conspicuous, and directly available on any Web page containing academic, cost, financial aid, or admissions information about a GE program.

An institution that offers a GE program in more than one program length must publish a separate disclosure template for each length of the program.

#### AFFECTED ENTITIES and BURDEN:

##### Individuals:

Under §668.412(e), an institution must provide, as a separate document, a copy of the disclosure information to a prospective student. Before a prospective student signs an enrollment agreement, completes registration at, or makes a financial commitment to the institution, the institution must obtain written confirmation from the prospective student that he or she received the copy of the disclosure information.

We estimate that the enrollment in the 12,250 GE programs offered by for-profit institutions for 2013-2014 included 2,227,230 students. Most institutions will have to contact, or be contacted by, a larger number of prospective students to yield institutions' desired net enrollments. We estimate that the number of prospective students that must contact or be contacted by for-profit institutions will be 6 times the number of expected enrollment. As noted above, we estimate that 2,227,230 students will be enrolled in GE programs at for-profit institutions. Therefore, for-profit institutions will be required to provide 13,363,380 disclosures (2,227,230 students times 6) to prospective students.

We estimate that the burden on each prospective student will be 0.08 hours (5 minutes) to read the disclosure information and provide written confirmation of receipt. Burden will increase by 1,069,070 hours for prospective students at for-profit institutions (13,363,380 prospective students times 0.08 hours) under OMB Control Number 1845-0107.

We estimate that the enrollment in the 2,343 GE programs offered by private non-profit institutions for 2013-2014 included 65,697 prospective students. Most institutions will have to contact, or be contacted by, a larger number of prospective students to yield their desired net enrollments. We estimate that the number of prospective students that must contact or be contacted by private non-profit institutions will be 1.8 times the number of expected enrollment. As noted above we estimate that 65,697 students will be enrolled in GE programs at private non-profit institutions. Therefore, private non-profit

institutions will be required to provide 118,255 disclosures (65,697 times 1.8) to prospective students.

We estimate that the burden on each prospective student will be 0.08 hours (5 minutes) to read the disclosure information and provide written confirmation of receipt. Burden will increase by 9,460 hours for prospective students at private non-profit institutions (118,255 prospective students times 0.08 hours) under OMB Control Number 1845-0107.

We estimate that the enrollment in the 22,996 GE programs offered by public institutions for 2013-2014 included 314,517 prospective students. Most institutions will have to contact, or be contacted by, a larger number of prospective students to yield their desired net enrollments. We estimate that the number of prospective students that must contact or be contacted by public institutions will be 1.5 times the number of expected enrollment. As noted above, we estimate that 314,517 students will be enrolled in GE programs at public institutions. Therefore, public institutions will be required to provide 471,776 disclosures (314,517 times 1.5) to prospective students.

We estimate that the burden on each prospective student will be 0.08 hours (5 minutes) to read the disclosure information and provide written confirmation of receipt. Burden will increase by 37,742 hours for prospective students at public institutions (471,776 prospective students times 0.08 hours) under OMB Control Number 1845-0107.

Collectively, burden will increase by 1,116,272 hours under OMB Control Number 1845-0107.

#### Institutions:

We estimate that of the 37,589 GE programs that reported enrollments in the past, 12,250 programs will be offered by for-profit institutions. We estimate that, annually, the amount of time it will take to collect the data from institutional records, from information provided by the Secretary, and from the institution's accreditor or State, and the amount of time it will take to ensure that promotional materials either include the disclosure information or provide a Web address or direct link to the information will be, on average, 4 hours per program. Additionally, we estimate that revising the institution's Web pages used to disseminate academic, cost, financial aid, or admissions information to also contain the disclosure information about the program will, on average, increase burden by an additional 1 hour per program. Therefore, burden will increase by 5 hours per program for a total of 61,250 hours of increased burden (12,250 programs times 5 hours per program) under OMB Control Number 1845-0107.

We estimate that of the 37,589 GE programs that reported enrollments in the past, 2,343 programs will be offered by private non-profit institutions. We estimate that, annually, the amount of time it will take to collect the data from institutional records, from information provided by the Secretary, and from the institution's accreditor or State, and the amount of time it will take to ensure that promotional materials either include the

disclosure information or provide a Web address or direct link to the information will be, on average, 4 hours per program. Additionally, we estimate that revising the institution's Web pages used to disseminate academic, cost, financial aid, or admissions information about the program to also contain the disclosure information will, on average, increase burden by an additional 1 hour per program. Therefore, burden will increase by 5 hours per program for a total of 11,715 hours of increased burden (2,343 programs times 5 hours per program) under OMB Control Number 1845-0107.

We estimate that of the 37,589 GE programs that reported enrollments in the past, 22,996 programs will be offered by public institutions. We estimate that the amount of time it will take to collect the data from institutional records, from information provided by the Secretary, and from the institution's accreditor or State, and the amount of time it will take to ensure that promotional materials either include the disclosure information or provide a Web address or direct link to the information will be, on average, 4 hours per program. Additionally, we estimate that revising the institution's Web pages used to disseminate academic, cost, financial aid, and admissions information about the program to also contain the disclosure information will, on average, increase burden by an additional 1 hour per program. Therefore, on average, burden will increase by 5 hours per program for a total of 114,980 hours of increased burden (22,996 programs times 5 hours per program) under OMB Control Number 1845-0107.

Under §668.412(e), an institution must provide, as a separate document, a copy of the disclosure information to a prospective student. Before a prospective student signs an enrollment agreement, completes registration at, or makes a financial commitment to the institution, the institution must obtain written confirmation from the prospective student that he or she received the copy of the disclosure information.

We estimate that the enrollment in the 12,250 GE programs offered by for-profit institutions for 2013-2014 included 2,227,230 students. Most institutions will have to contact, or be contacted by, a larger number of prospective students to yield institutions' desired net enrollments. We estimate that the number of prospective students that must contact or be contacted by for-profit institutions will be 6 times the number of expected enrollment. As noted above, we estimate that 13,363,380 (2,227,230 students for 2013-2014 times 6) students will express interest in GE programs at for-profit institutions. Therefore, for-profit institutions will be required to provide 13,363,380 disclosures to prospective students.

On average, we estimate that it will take institutional staff 0.03 hours (2 minutes) per prospective student to provide a copy of the disclosure information which can be hand-delivered, delivered as part of a group presentation, or by sending the disclosure template via the institution's primary email address (used to communicate with students and prospective students). We also estimate that, on average, it will take institutional staff 0.10 hours (6 minutes) to obtain written confirmation and answer any questions from each prospective student. Therefore, we estimate that the total burden associated with providing the disclosure information and obtaining written confirmation by for-profit institutions will be 0.13 hours (8 minutes) per prospective student. Burden will

increase by 1,737,239 hours for for-profit institutions (13,363,380 prospective students times 0.13 hours) under OMB Control Number 1845-0107.

We estimate that the enrollment in the 2,343 GE programs offered by private non-profit institutions for 2013-2014 included 65,697 prospective students. Most institutions will have to contact, or be contacted by, a larger number of prospective students to yield their enrollments. We estimate that the number of prospective students that must contact or be contacted by private non-profit institutions will be 1.8 times the number of expected enrollment. As noted above we estimate that 65,697 students will be enrolled in GE programs at private non-profit institutions. Therefore, private non-profit institutions will be required to provide 118,255 disclosures (65,697 times 1.8) to prospective students.

On average, we estimate that it will take institutional staff 0.03 hours (2 minutes) per prospective student to provide a copy of the disclosure information which can be hand-delivered, delivered as a part of a group presentation, or by sending the disclosure template via the institution's primary email address (used to communicate with students and prospective students). We also estimate that, on average, it will take institutional staff 0.10 hours (6 minutes) to obtain written confirmation and answer any questions from each prospective student. Therefore, we estimate that the total burden associated with providing the disclosure information and obtaining written confirmation by private-non-profit institutions will be 0.13 hours (8 minutes) per prospective student. Burden will increase by 15,373 hours for private non-profit institutions (118,255 prospective students times 0.13 hours) under OMB Control Number 1845-0107.

We estimate that the enrollment in the 22,996 GE programs offered by public institutions for 2013-2014 included 314,517 prospective students. Most institutions will have to contact, or be contacted by, a larger number of prospective students to yield their desired net enrollments. We estimate that the number of prospective students that must contact or be contacted by public institutions will be 1.5 times the number of expected enrollment. As noted above, we estimate that 314,517 students will be enrolled in GE programs at public institutions. Therefore, public institutions will be required to provide 471,776 disclosures (314,517 times 1.5) to prospective students.

On average, we estimate that it will take institutional staff 0.03 hours (2 minutes) per prospective student to provide a copy of the disclosure information which can be hand-delivered, delivered as part of a group presentation, or by sending the disclosure template via the institution's primary email address (used to communicate to students and prospective students). We also estimate that, on average, it will take institutional staff 0.10 hours (6 minutes) to obtain written confirmation and answer any questions from each prospective student. Therefore, we estimate that the total burden associated with providing the disclosure information and obtaining written confirmation by public institutions will be 0.13 hours (8 minutes) per prospective student. Burden will increase by 61,331 hours for public institutions (471,776 prospective students times 0.13 hours) under OMB Control Number 1845-0107.

Collectively, we estimate that burden will increase by hours in OMB Control Number 1845-0107.

Revised burden calculations for Section 668.412 – Disclosure requirements for GE programs.

	<b># of Respondents</b>	<b># of Responses</b>	<b># of Burden</b>
<b>Hours:</b>			
INDIVIDUALS:	13,953,411	13,953,411	1,116,272
INSTITUTIONS			
Proprietary:	2,526	13,375,630	1,798,489
Private Non-Profit:	318	120,598	27,088
Public:	<u>1,117</u>	<u>494,772</u>	<u>176,311</u>
Institution Sub-total:	3,961	13,991,000	2,001,888
<b>Updated Total for Disclosures:</b>	<b>13,957,372</b>	<b>27,944,411</b>	<b>3,118,160</b>
<b>Current Burden:</b>	<b>27,944,411</b>	<b>27,944,411</b>	<b>3,118,160</b>
<b>Difference:</b>	<b>-13,987,039</b>	<b>0</b>	<b>0</b>

The revision to the number of respondents from data transferred from 1845-0123 was made to correct an over-counting of institutional respondents. The responses and burden hours transferred from 1845-0123 are not changed.

Attached is the revised Gainful Employment Disclosure Template screen shots of the input document, a web-based information collection disclosure template, and the output document to be displayed on the institution’s Web site.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as

purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.

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

Total Annualized Capital/Startup Cost :  
Total Annual Costs (O&M) :

Total Annualized Costs Requested : \_\_\_\_\_

No costs have been associated with this revision.

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

The estimate of annualized cost to the Federal government is \$50,000 per year.  
The cost was provided as a contract estimate from the Office of Postsecondary Education.

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 revision of the current collection package. The Department is discharging the current burden assigned to 1845-0107 (448,152 hours, 2,611,405 respondents and 2,645,033 responses) due to the sunset provision of 34 CFR 668.6(d).



The Department is requesting the transfer of the currently assessed 3,118,160 burden hours, 27,944,411 respondents and responses for 34 CFR 668.412 from approved information collection 1845-0123. Further following the transfer, we are requesting a decrease in the number of respondents by -13,987,039 to correct an over-counting of participating institutions. The corrected burden request for this information collection is now 13,957,372 respondents, 27,944,411 responses, and 3,118,160 hours.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This information will not be published by the Department.

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.

The Department is not seeking exception to the certification.