SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

Educational Quality through Innovative Partnerships (EQUIP)
Experimental Site Project

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[1]. 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.

   Pursuant to 5 CFR 1320.13(a)(2)(i) and (iii), the U.S. Department of Education (Department) submits this request for an extension of the approved information collection without change to the respondent or burden figures or the form. The collection instrument is a series of questions that are a component of the selection process for a Federal Student Aid (FSA) experimental site project as authorized under Section 487A of the Higher Education Act of 1965, as amended (HEA). The Educational Quality through Innovative Partnerships (EQUIP) project was undertaken in order to advance the Department's understanding of how best to increase access to high quality innovative programs in higher education. Any invitation for additional participation and an explanation of this experimental site project would be published separately in the Federal Register.

   The landscape for learning in postsecondary education is undergoing tremendous development and new organizations and providers have begun to offer more non-traditional programs, but there are no broadly recognized mechanisms for sharing best practices about these new providers, ensuring quality, providing important protections for students and conducting Title IV gatekeeping. This experimental site project is designed to explore ways to increase access for low-income students to high-quality innovative programs in higher education, through the engagement of institutions of higher education (IHEs) with non-IHE providers and quality assurance entities that can develop new quality assurance processes for student and taxpayer protection.

   In the context of current national discussions about postsecondary access and affordability, innovation, accreditation, and quality assurance processes, including the need to reauthorize the HEA, the Department is interested in learning as much as possible about how best to advance equitable access to high quality innovative educational opportunities. The data and information collected from the experimental site provides valuable guidance for the Department in determining future policy in these areas.

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

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

   The Department will collect the information in the attached instrument from the IHE applying to the EQUIP experiment. The responses to the information collection instrument will be submitted electronically. The information collected will be used by the Department to make an informed selection of participants for the EQUIP experiment.

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 Department will permit and encourage the IHEs applying to submit its responses to this collection electronically through the experimentalsites@ed.gov mailbox. Electronic information submission presents a minimal burden on the IHEs and will streamline the collection process.

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 is a unique experiment seeking to understand how to increase access to high quality higher education programs offered by non-traditional providers, so there are no other data sources in the Department. We do not require IHE's to submit data useful to the selection process which is already held by the Department.

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.

   No small businesses are impacted by this collection.

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.

   This is a collection to assist the Department in selecting participating IHEs for EQUIP. In order to have sufficient and specific information to make an informed

selection of participants in that program, the Department needs to gather the information outlined in this instrument. Before allowing access to title IV, HEA programs, the Department needs to have details on the specific programs to be offered, student supports and protections, and quality assurance processes in order to maximize the potential for strong student outcomes and student and taxpayer protections.

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.

   This information collection does not involve any of the above conditions.

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 Department is engaged in ongoing outreach with stakeholders, including institutions of higher education, foundations, accreditors, and others. Outreach has included a symposium to foster development around best practices for assuring quality in higher education and to learn about the types of data that may be available to help IHEs and their partners assess and monitor quality and meet objectives relating to the experimental site.

A notice was published in the Federal Register on October 29, 2018, (Vol. 83, No. 209, pages 54336 and 54337) requesting public comment on the proposed burden assessment. One comment was received and FSA's reply is attached. No change has been made to the questionnaire or the burden based on the comment received.

The Department is now requesting a 30-day comment period to allow the public to review and provide comment on the selection questions that will be used to determine the final institutional participation in this experiment.

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

   There will be no payments, gifts or remuneration provided to respondents of the information collection request.

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 confidentially of the data.

    No personally identifiable information is being collected, so no assurance of confidentiality is necessary.

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

[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)

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 instrument does not pose questions of a private or 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 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.

The Department continues to estimate an average of 80 hours per respondent to complete the series of questions that will be used to evaluate the IHE for participation in EQUIP. This includes the time needed to review the participation questions and prepare comprehensive responses.

The Department continues to anticipate that a total of 60 IHEs may express an interest in participating in this initiative for a total of 4,800 hours of burden (60 x 80 hrs. = 4,800).

	Respondents	Responses		Burden Hours
Public Institution	29	29	x 80 =	2,320
Private Institution	24	24	x 80 =	1,920
For-Profit Institution	7	7	x 80 =	560
TOTAL	60	60		4,800

The Department maintains its estimates for the cost of completion of the collection instrument to be $175,440. This is based on an average institutional staff cost of $36.55 per hour multiplied by the estimated 4,800 burden hours.

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

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12

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

There is no additional cost burdens associated with this collection other than those listed in item 12.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff),

and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

There is no additional cost to the Federal government.

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).

    The Department is requesting an extension without change of this approved information collection. This request is due to agency discretion. The Department continues to estimate an anticipated 60 respondents requiring 80 hours per response for a total burden of 4,800 hours for this experimental sites project.

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.

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 will display collection approval and expiration date for OMB approval on the application.

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

    There are no exceptions to the certification statement identified in the Certification of Paperwork Reduction Act.