

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. 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, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

The Office of Postsecondary Education (OPE) is seeking review of a revision for the College Affordability and Transparency Explanation Form (CATEF) data collection. The collection of information through CATEF has been required since 2011-12 pursuant to §132 of the Higher Education Act of 1965 as amended (HEA), 20 U.S.C. §1015a, with the goal of increasing transparency of college tuition prices for consumers. This submission is for the 2020-21, 2021-22 and 2022-23 collection years.

a. Related background information

Section 132 of the HEA includes provisions designed to improve transparency in college tuition for consumers. In response to these provisions, the Department of Education (ED) created the College Affordability and Transparency Center (CATC) website (<http://collegecost.ed.gov/>), which can be accessed through the Department's College Navigator tool. The CATC website includes information for students, parents, and policymakers about costs at America's postsecondary institutions. The website also includes several lists of institutions based on the tuition and fees and net prices (the price of attendance after considering all grant and scholarship aid) charged to students.

This request is to continue to survey institutions using the CATEF, which collects follow-up information from a specific subset of institutions with a small revision. Data analysis was conducted on the open-ended responses from previous years CATEF to create multiple-choice lists. Using the lists is less burdensome for institutions than typing in open-ended responses. The specific institutions required to respond to the survey are those that appear on the tuition and fees and/or net price increase CATC Lists for being in the five percent of institutions in their institutional sector that have the highest increases, expressed as a percentage change, over the three-year time period for which the most recent data are available. The lists published on the CATC website are generated using data collected by the National Center for Education Statistics (NCES) through the Integrated Postsecondary Education Data System (IPEDS). IPEDS is a required data collection for institutions that participate in any federal student financial aid program authorized by Title IV of the HEA (20 USC § 1094, Section 487(a)(17) and 34 CFR 668.14(b)(19)).

The information collected through CATEF is used to write a summary report for Congress that is also posted on the CATC website (accessible through the College Navigator). The report

summarizes the general and sector specific findings from the CATEF responses using descriptive statistics.

There are six sections to CATEF. Section 1 of CATEF asks for general information about the individual who is completing the form on behalf of a CATC institution. Section 2 preloads the cost areas showing the greatest increases over a three-year period from data reported on the IPEDS Finance survey component. Section 3 requires institutions to provide an explanation for the three cost areas with the highest percentage change increase over the same three-year period. Section 4 asks the institutions to explain steps that have been taken or will be taken toward reducing the identified areas of increased costs. Section 5 provides the opportunity for institutions to describe the extent to which they participate in setting tuition and fees and net prices for students and identify the agencies outside of the institution that decide those student charges. Section 6 asks institutions to estimate the burden to complete the CATEF. The two CATEF forms have the same questions with the only difference being that one is focused on changes in tuition and fees and the other is focused on changes in net prices.

b. Statutory requirements for College Affordability and Transparency Center Explanation Form (CATEF)

Section 132 of the HEA which mandates the CATEF collection requires the Department to collect additional information from the institutions in the top five percent of their institutional sector for increases in either tuition and fees and/or net price to students over the most recent three-year period for which data are available (see §132(e) of the HEA). The additional information that must be collected from the institutions includes:

- A description of the major areas in the institution's budget with the greatest cost increases.
- An explanation of the cost increases.
- A description of the steps the institution will take toward the goal of reducing costs in the areas described.

In the case of an institution that is included on the same list for two or more consecutive years, a description of the progress made on the steps taken by the institution to reduce costs.

If the determination of any cost increase described above is not within the exclusive control of the institution, the institution must provide an explanation of the extent to which the institution participates in determining such cost increase, identify the agency or instrumentality of State government responsible for determining such cost increase, and provide any other information the institution considers relevant to the report.

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 information collected using the CATEF is used to write an annual report to Congress that is also published on the College Navigator and CATC websites. This report summarizes information on the major areas of institutions' budgets with the greatest cost increases, the explanations for these increases, and the steps institutions have been or will be taking towards reducing these costs. This summary report also includes information on whether the institutions have exclusive control of the increase in student charges and if not, which agency is responsible

for determining those increases and to what extent the institution participates in that determination process.

Institutions that continue to appear on the list of the top five percent of institutions in their sector with the highest increases in tuition and fees and/or net price to students have to describe the progress they have made on the steps towards cost reductions they reported in the previous year.

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. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

The CATEF collection has employed several techniques to reduce respondent burden while improving the timeliness and quality of the information reported:

1. The institutional burden is reduced by identifying ahead of time which CATEF form an institution should complete – there are two CATEF forms (see supporting documents), the Net Price form and the Tuition and Fees form (an institution could appear on both the tuition and fees and the net price increase CATC Lists, and be required to complete both forms);
2. NCES preloads and/or calculates reported data in the CATEF Section 2 “Cost Area,” which is based on expense data reported on the IPEDS Finance survey component and full-time equivalent (FTE) student enrollment data reported on the IPEDS 12-Month Enrollment survey component;
3. Edit checks and data verification procedures are built into the collection process, thus resolving errors at the time of data submission and making the process more efficient;
4. The institutions that appear on the CATC Lists change from year to year – however, for institutions that appear on CATC and complete a CATEF two years in a row, a link at the bottom of the survey for the prior year to help these institutions explain the progress they made on the previous year’s steps to reduce costs and a PDF copy of the previous year’s completed CATEF is emailed on request; and
5. The use of a web-based form also reduces burden to the institutions by allowing for aggregation of the information they submit, leading to a timelier release of the summary report to Congress.

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.**

ED has made the effort to ensure that the CATEF does not duplicate other data collection activities. While some information on institutional finances are already collected in IPEDS, the level of detail and explanations required to satisfy the statute are not currently collected by ED outside of CATEF.

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.**

Certain providers of postsecondary education identified in the CATC Lists, specifically operators of proprietary (private, for-profit) schools, may be classified as small businesses. This collection, which fulfills the statutory requirements, is designed to minimize burden for all respondents through the use of technology.

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.**

Annual CATEF collection is required by the HEA. Without CATEF data, ED would not be able to meet its legal obligation to report to Congress on institutions' progress towards the goal of reducing costs to students.

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.**

None of the special circumstances described apply 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.**

Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30 day notice, indicate that a notice will be published.

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.

Minor changes to the survey instrument will be made and public comment will be sought. The minor changes are limited to changing open ended questions to closed ended multiple choice questions.

A federal register notice was published December 10, 2020 (Vol. 85, No. 238, page 79483) requesting public comment on this information collection. Two comments were received during the 60-day public comment period. Both comments were from the same commenter and referenced attachments, however no attachments were uploaded. Based on the lack of comments received the Department will 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 offered 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.¹ 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. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.**

Information for the CATEF is not collected under any pledge of confidentiality.

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 contains no questions of a sensitive nature.

12. **Provide estimates of the hour burden for this current information collection request. The statement should:**
- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
 - **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**

¹ 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)

- **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. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. 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. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

The estimated time burden to respondent per form for the CATEF is 2.3 hours on average, which is based on feedback provided by the 483 institutions that responded to the 2020 CATEF collection and calculation of estimated reduction in burden based on new question format. The form will be completed by the top five percent of institutions in each sector with the largest increases in tuition and fees and/or net prices to students. Thus, the exact number of institutions that will be included in the collection may vary slightly from year to year based on the number of institutions in each sector. The number of respondents may also vary depending on how many institutions are included on both the tuition and fees and net price increase lists, as that overlap would limit the number of other institutions included in the top five percent that would have to report data. The 2021 collection will have 499 institutions (228 on the Tuition and Fee increase list only, 227 on the Net Price Increase List only, but 44 are on both of these lists) that will need to fill out a total of 544 forms, resulting in an estimated burden of 1,251.2 hours per year for all respondents. Because the institutions that will be on the CATC Lists in subsequent years have not yet been identified, we are using the 2021 number of respondents as the estimated number for subsequent years.

In all cases, if the data are readily accessible, then the time required is less than the estimated burden hours. Estimates include the time for reviewing instructions, gathering and maintaining the institution's general-purpose financial statements for the corresponding first and third years used in the list calculation, and completing and reviewing the required information. This time burden was reviewed by the people noted in section A.8 and B.5 that provided consultation on the survey. Every year of the CATEF collection, ED asks the institutions how long it took them

to complete the survey.

The total cost to respondents is based on the estimated response burden (hours) multiplied by \$40.96² (in 2016), which was estimated using the median hourly wage (including benefits) for an operations research analyst and computer programmer (for running programs to extract data). The hourly wage is increased by an assumed two percent cost-of-living adjustment for subsequent years.

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
CATEF			499	544	2.3	1,251.2	\$40.96	\$51,250
Annualized Totals			499	544	2.3	1,251.2	\$40.96	\$51,250

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**

² The estimated response burden cost is derived from the median hourly wage rates of operations research analysts (\$40.78) and computer programmers (\$41.61) published by the U.S. Bureau of Labor Statistics 2019, and adjusting the median hourly rates by 30.2% to include benefits. Using the estimated response burden hours of 3.33 reported by institutions completing the CATEF in 2020, NCES estimates the work would take 2.58 hours of an operations research analyst and .69 hours of a computer programmer, resulting in an hourly rate of approximately \$40.96. Note: The position of operations research analyst (SOC code 15-2031) is the best proxy for institutional researchers.

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 cost burden to respondents or record keepers for start-up or capital associated with this collection.

- 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.**

On an annual basis, over the three collection years, the Department's contract costs will average about \$90,000 per year to include both the collection of the data and analysis support for the final report; Federal S&E will be approximately \$30,000 per year. Therefore, the total Federal annual cost will average about \$130,000/year over the three collection years. More than 95% of this amount will be spent in direct support of the collection, analysis, and reporting of the College Affordability and Transparency information described herein. The contract amount includes the data collection system development and maintenance; programming and software modifications and documentation; data collection, review, and analysis; survey administration; file preparation; and other related activities. The costs include personnel, fringe benefits, supplies, computer related activities, consultants, other direct and indirect costs, plus overhead and G&A.

The time estimates and costs associated with the activities described above are based on estimates from the contractors that currently support the CATEF collection and other College Affordability and Transparency operations. IPEDS in-house staff costs are based on FY2020 pay schedules. For each of the subsequent fiscal years, we estimate a 0% increase due to the uncertainty of the federal budget's impact on wages and salaries for federal employees. We thus estimate the total cost to the government for the 2020-21, 2021-22, and 2022-23 CATEF data collections to be approximately \$420,000.

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).**

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

Minor changes are being requested to the data collection instruments that were approved in November 2012 (OMB# 1840-0822 v.2). We will continue to use two CATEF forms: (1) Net Price and (2) Tuition and Fees. Analysis of past open-ended data for Section 3: Cost Increase Explanation in both surveys revealed that the open-ended items could be replaced with multi-choice items. We estimate that the reduction in burden will be reduced to 2.3 hours per survey from the average of 3.33 hours reported in the 2020 collection and an estimated reduction.

In the 2020 collection 200 minutes (3.33 hours) were needed to complete the forms:

- The respondent would spend 30 minutes to complete the 2 to 4 optional and/or short questions, verifying contact information, logging in and changing the default password.
- There are 6 free-text questions about cost areas, 15 minutes for preparation and 13.3 for answering, which results in 28.3 minutes for each question multiplied by 6 for 170 minutes.

By replacing the free-text questions with drop-down menu questions, the time to complete those questions should be reduced 3 minutes per question resulting in a reduction to 18 minutes per cost area question.

There is a reduction of 0.97 hours per survey from 3.27 hours per survey from the previous ICR. The current request estimate 544 responses for a total burden of 1,251.2 hours.

The request in the previous ICR was 3.27 hours per survey X 631 responses = 2,063.67 burden hours.

The current request is 2.3 hours per survey X 544 responses = 1,251.2 burden hours.

The request also includes a reduction of the number of responses due to an adjustment in the Government's estimate.

Thus, this submission reflects a total burden time decrease of 812 hours due to burden estimate adjustment and change in question format.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden		-528	-284
Total Responses			-87
Total Costs (if applicable)			

- 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.**

<i>Previous Year</i>	
July 1	CATC Lists are released
<i>Current Year</i>	
First week of January	Email sent to institutions on the highest tuition and/or net price increase CATC List with instructions to complete CATEF
First week of January	CATEF collection opens for approximately 4 weeks
First week of February	CATEF collection closes
End of March	CATEF summary report for previous collection is released along with the new CATC Lists

Annual survey activity is typically a 4-week collection cycle. Respondents will be the locking keyholders for the IPEDS data collection. They will be sent a UserID and randomly generated password to use for registration when the collection opens. Registration must take place (only once) before data can be entered into the system. Data will be entered directly into the system and will have to be entered for all required fields and have all errors resolved before data can be submitted. Once the collection closes for institutions, the survey administrators review the data. Following ED approval of the file, data will be tabulated and analyzed, and the summary report prepared.

The report will summarize the general and sector specific findings from the CATEF using a mix of descriptive statistics and explanatory information. The main cost areas showing the highest increases will be identified using the quantitative information provided by institutions. The most reported plans to reduce those cost increases will also be indicated. Finally, the extent to which institutions participate in setting tuition, fees, and net prices for students will be described and the agencies outside of the institutions that decide those student charges will be identified. Following the statutory requirements, the summary report will then be submitted to Congress and posted on the College Navigator website.

- 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 approval to forego displaying the OMB approval expiration date.

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

There are no exceptions to the certification statement.