



UNITED STATES DEPARTMENT OF EDUCATION

April 26, 2021

MEMORANDUM

TO: Lindsay Abate
Office of Management and Budget Desk Officer

FROM: Beatriz Ceja *Beatriz Ceja*
Senior Director, Institutional Service

RE: Emergency request for Paperwork Reduction Act (PRA) approval

Pursuant to the Office of Management and Budget (OMB) procedures established at 5 CFR 1320, ED requests that the following collection of information, Required Proprietary Institution Certification Form, be processed in accordance with section 1320.13 Emergency Processing. ED has determined that this information must be collected prior to the expiration of time periods established under Part 1320, and that this information is essential to ED's ability to effectively implement ARP and address the economic disruption posed by the Novel (new) Coronavirus ("2019-nCoV").

Section 2003(4) of ARP (ARP (a)(4))¹ provides funding for proprietary institutions of higher education (IHEs), to be used solely to make financial aid grants directly to students, which may be used for any component of the student's cost of attendance or for emergency costs that arise due to the coronavirus, such as tuition, food, housing, health care (including mental health care) or child care. This collection includes required certifications that must be completed by proprietary institutions seeking funding under this section.

If this emergency collection is not approved, the Department will be unable to issue these awards in a timely manner. Due to the heightened risk associated with proprietary institutions, the Department has determined that it is necessary to obtain these additional certifications prior to making further awards under the (a)(4) funding stream. Without approval of the Required Proprietary Institution Certifications form, the Department will be forced to delay making ARP (a)(4) awards to these institutions. Delay of ARP (a)(4) awards would be particularly problematic, as Congress has designated these funds as being solely directed to emergency financial aid grants to students at these institutions. Thus,

¹ Because ARP section 2003(4) is governed in part by the Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA) (Pub. L. 116-260) section 314 (a)(4), we refer to this program herein as "ARP (a)(4)".

without emergency approval, many students will be left without funding to address key financial needs, such as for emergency costs that arise due to coronavirus, or unmet financial needs for food, housing, health care, mental health care, or child care. Delay of funding to these students could contribute to the systemic increase in dropout and withdrawals of college students that have taken place as a result of 2019-nCoV, having life-altering impacts on the students who are forced to disrupt or permanently change their educational plans.

Given the short timeframe, ED is unable to consult with the public prior to issuing the form. However, ED has ample experience designing other similar forms in a way that is clear and minimizes burden. We estimate that the form will require 30 minutes per applicant to complete.

The Department is requesting an emergency clearance from OMB by May 7 and will publish an emergency notice with a 60 day comment period as required by 5 CFR 1320.8(d) to solicit public comments on the regular information collection.