# **SUPPORTING STATEMENT**

# **FOR PAPERWORK REDUCTION ACT SUBMISSION**

Collection Title

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 Department is seeking a revision of the OMB approval of a Third-Party Servicer Data Inquiry Form. This form collects information from third-party servicers. This form is used to validate the information reported to the Department by higher education institutions about the third-party servicers that administer one or more aspects of the administration of the Title IV, Higher Education Act of 1965, as amended, (HEA) programs on an institution’s behalf. This form also collects additional information required for effective oversight of these entities. This is a request for the revision of information collection 1845-0130. The Department is transitioning the current Third-Party Servicer Data Inquiry form to an electronic webform that will be housed within the FSA Partner Connect system. While some existing questions have been revised and additional questions have been added to the webform, there has been no change to the supporting regulatory language.

Title IV eligible institutions of higher education are required to notify the Secretary of their third-party servicer relationships. In addition to the name and address of the servicer, institutions are required to report the name and phone number of the servicer’s contact person as well as identify the services performed on behalf of the institution. The Department determined through data analysis, research, program reviews, and audits that a significant number of higher education institutions failed to report, update, and/or incorrectly reported third-party servicer information. As a result, information contained in the Department’s databases regarding third-party servicer contacts, demographics, client lists, and/or the services provided to higher education institutions was inconsistent and inaccurate. Therefore, the Department was unable to rely on the information reported by institutions to provide appropriate oversight of the entities performing work on behalf of Title IV eligible institutions.

The information collected through the Third-Party Servicer Data Inquiry form allows the Department to identify institutions of higher education that are failing to report or incorrectly reporting third-party servicer information, to monitor and enforce third-party servicer compliance with annual audit requirements pursuant to 34 C.F.R. 668.25(c), to identify other persons or organizations that contract with a third-party servicer to assist with any aspect of the administration of a Title IV program on behalf of the third-party servicer or its clients, and to effectively coordinate third-party servicer program review assessments.

The HEA allows institutions of higher education to outsource any aspect of the institution’s participation in any Title IV, HEA program. A third-party servicer is defined as any individual or entity that contracts with or performs work on behalf of an institution to administer, through manual or automated processing, any aspect of an institution’s responsibilities required under the Title IV, HEA programs. 34 C.F.R. 668.2 (definition of third-party servicer).

Higher education institutions are required to notify the Secretary within 10 days of the date that:

1. the institution enters into a new contract or significantly modifies an existing contract with a third-party servicer to administer any aspect of that program;
2. the institution or a third-party servicer terminates a contract for the servicer to administer any aspect of that program; or
3. a third-party servicer that administers any aspect of the institution’s participation in that program stops providing services for the administration of that program, goes out of business, or files a petition under the Bankruptcy Code.

The institution’s notification must include the name and address of the servicer. See 34 C.F.R. 668.25(e)(1).

The Title IV, HEA regulations authorize the Department to provide oversight of third-party servicers. A third-party servicer is subject to the highest standard of care and diligence in administering any aspect of the programs on behalf of the institutions with which the servicer contracts and in accounting to the Secretary and those institutions for any funds administered by the servicer under those programs. 34 C.F.R. 668.82(b)(2).

When contracting with an institution, a servicer and/or its contractors essentially step into the shoes of that institution with respect to its compliance with the various requirements relevant to the Title IV, HEA functions it is servicing. A servicer is jointly and severally liable with the institution for any violation of Title IV, HEA requirements resulting from the functions performed by the servicer. 34 C.F.R. 668.25(c)(3).

The failure of a third-party servicer to administer a Title IV, HEA program, or to account for the funds that the institution or servicer receives under that program, in accordance with the highest standard of care and diligence required of a fiduciary, constitutes ground for the Department to:

1. Seek an emergency action against the servicer;
2. Impose a fine against the servicer; or
3. Limit, suspend, or terminate the servicer’s eligibility to contract with any institution to administer any aspect of the institution’s participation in that program.

34 C.F.R. 668.82(c)(2).

A third-party servicer violates its fiduciary duty if the servicer uses or contracts in a capacity that involves any aspect of the administration of the Title IV, HEA program with any other person, agency, or organization that has been or whose officers or employees have been convicted of, or pled nolo contendere or guilty to, a crime involving the acquisition, use, or expenditure of Federal, State, or local government funds; or administratively or judicially determined to have committed fraud or any other material violation of law involving Federal, State, or local government funds. 34 C.F.R. 668.82(d)(1)(i)(D).

1. **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.**

Third-Party Servicers that contract with Title IV eligible institutions to administer any aspect of an institution’s responsibilities required under the Title IV, HEA programs are required to complete the Third-Party Servicer Data Inquiry Form. Forms are currently available to download from FSA Partner Connect at fsapartners.ed.gov (previously posted on the Information for Financial Aid Professionals (IFAP) website). Servicers are instructed to submit the form to the Third-Party Servicer Oversight Group/Kansas City School Participation Division by e-mail or regular mail. A fillable PDF version of the form is also available on FSA Partner Connect. Servicers complete the form and click the submit icon located at the bottom of the form. The information on the form is automatically e-mailed to the Third-Party Servicer Oversight Group.

The Third-Party Servicer Oversight Group compares the information collected on the Third-Party Servicer Inquiry Form to the information reported by higher education institutions that is maintained in Department systems. The Third-Party Servicer Oversight Group follows up with third-party servicers and higher education institutions to resolve discrepancies and updates the information in the Department’s system(s) as needed. Higher Education institutions that fail to report or terminate third-party servicer relationships are notified to update the appropriate system(s) to accurately reflect the institution’s relationship with the servicer(s). The Third-Party Servicer Oversight Group enters the information collected on the form into an Access database utilized by the Third-Party Servicer Oversight Group to track program review and audit activities. The information collected provides essential data needed to monitor third-party servicer compliance with annual audit requirements, as well as more reliable data for risk analysis and program reviews.

The information collected from the paper or fillable PDF versions of the Third-Party Servicer Data Inquiry form submissions will be utilized to populate the third-party servicer information that will be housed within the FSA Partner Connect system. This functionality is scheduled to be implemented in August 2022. FSA Partner Connect will replace and/or integrate with a number of Department systems, including the Postsecondary Education Participants System (PEPS) and the Third-Party Servicer Oversight Access database.

The Third-Party Servicer Oversight Group in coordination with the Department’s Policy Liaison and Implementation staff issued an electronic announcement to the Higher Education community on February 12, 2015 to communicate the requirement for third-party entities to comply with this request. Information was also referenced in Dear Colleague Letter GEN-16-15 issued on August 16, 2016.

1. **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.**

Respondents currently submit the form as a fillable PDF, as an e-mail attachment, or print and submit the form via standard mail delivery. Once the new FSA Partner Connect functionality is implemented in August 2022, respondents will be able to enter and/or update the information via a dedicated custom webform that contains built in validations that ensure servicers are filling out questions in the correct format. The webform will contain help text to guide servicers through completion of the form. Most questions on the form will be pre-populated using information the servicer submitted on its prior Third-Party Servicer Data Inquiry form submission. Pre-populating the answers to questions will reduce burden for the servicer and will alleviate the need for the servicer to enter a response to every question. The servicer will only need to review the pre-populated information, and if necessary, update it. Once the servicer completes its updates and electronically signs the form, the form will be submitted to the Department for review. The information on the form will automatically populate into the Department’s system, thus reducing the Department’s burden for data entry as well as increasing the accuracy of the data.

The webform has additional features such as:

* Navigation links to allow the user to move from one section of the form to another;
* Smart logic that skips questions or sections that do not apply to the servicer based on conditional responses provided to questions;
* Edits that help the servicer not miss required questions;
* A status page that allows the institution to monitor the status of the form after submission;
* Ability to attach documentation related to the form with conditional validations in place to ensure the servicer is submitting the required documents along with form.
1. **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.**

Servicers are not required to maintain duplicate records. A new servicer will not have provided similar information to any other office in the Department.

The Department previously did not have a mechanism in place to collect the information needed for effective oversight directly from the entities that partner with eligible higher education institutions to perform Title IV related functions. The minimal amount of third-party servicer information that was collected from higher education institutions prior to the development of this form was determined to be inaccurate, inconsistent, and limited in scope.

In addition, prior to the development of this form, the Department had received notification from higher education institutions indicating that some servicers had incorrectly instructed institutions to not report an entity as a third-party servicer creating confusion in the community regarding who should or should not be reported as a third-party servicer. As a result, the Department had been unable to rely on the information reported by higher education institutions to determine servicer compliance with audit requirements and/or to contact servicers for purposes of scheduling program reviews or responding to inquiries.

Reliance solely on data reported from higher education institutions restricted the Department’s ability to ensure third-party servicers were complying with the statutes and regulations the Department has been tasked with overseeing. Requiring third-party servicers to complete and submit the information contained on the Third-Party Servicer Data Inquiry form equips the Department with the information necessary to effectively provide required oversight.

Approval of this data collection tool will continue to allow the Department to request and obtain vital information directly from entities that have been identified as third-party servicers regardless of whether or not the servicer has been reported through the notification process utilized by institutions of higher education.

1. **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 affected by this information collection.

1. **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.**

As stated previously, reliance solely on data reported from higher education institutions restricted the Department’s ability to ensure third-party servicers are complying with the statutes and regulations the Department has been tasked with overseeing. The Department must be able to easily identify and contact any entity that is involved in the administration of Title IV programs on behalf of a Title IV eligible institution or the students it serves. The Department developed this method to validate the information reported by higher education institutions and to resolve discrepancies when one or more entities report incorrect or conflicting information.

Absent this data collection tool to request pertinent information from third-party servicers that contract with Title IV eligible institutions to perform one or more Title IV related functions, the Department lacks adequate information that is necessary to ensure compliance with the laws, regulations, and policies that govern the Title IV programs. Failure to collect this information jeopardizes the Department’s ability to fulfill its fiduciary responsibility of safeguarding taxpayer interest and ensuring all participants in the system of funding postsecondary education serve the interests of students.

1. **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.**

Entities are required to submit the initial Third-Party Servicer Data Inquiry Form within, but no later than, 30 days after receiving notification of the requirement. Consistent with the requirements of higher education institutions pursuant to 34 C.F.R. 668.25(e)(1), third-party servicers are required to submit revised information within 10 days of the date:

* The entity changes its name;
* The entity changes the address or contact information for a primary location or additional location;
* The entity adds or terminates a contract with an eligible Title IV institution; or

The entity buys, sells, or merges with another third-party servicer.

1. **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.**

The Department considered comments from the public when developing the currently approved form. The Department will continue to consider any public comments provided during the 60- and 30-day comment periods.

On April 4, 2022, a Federal Register Notice was published, Vol. 87, No. 64, pages 19486-19487 inviting comment from the public. Comments were received from 2 separate entities. The Department’s responses to these comments is attached separately. There is no change to the proposed form, or respondent/response/burden estimates based on these comments.

The Department is now requesting the 30-day public comment period period notice be published.

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

No gifts or payments will be provided to any respondents.

1. **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]](#footnote-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.**

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

1. **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.**

The Department is not collecting information of a sensitive nature.

1. **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.**
* **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**](https://www.bls.gov/oes/current/oes_nat.html) **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.**

The Department has received 232 Third-Party Servicer Data Forms. Of the 232, 175 are for-profit servicers, 24 are non-for-profit servicers, 9 are State servicers, and 24 are individuals. Of these 232 Third-PartyServicer Data Forms, the Department estimates that up to 100% or 232 Third-PartyServicers will need to review and provide updates to the form taking 30 minutes for each response for a total of 19 additional burden hours (232 respondents x 30minutes/ 60 minutes = 117 hours) assigned to OMB Control Number 1845-0130.

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of Respondent** | **Number of Responses** | **Time/Response** | **Total Time** |
| For-profit servicer | 175 | 30 minutes | 88 hours |
| Not-for-profit servicer | 24 | 30 minutes |  12 hours |
| State agencies | 9 | 30 minutes | 5 hours |
| Individuals | 24 | 30 minutes |  12 hours |
| **Sub Total for Updates**  | **232** |  | **117 hours** |

Additionally, the Department anticipates receiving 45 new Third-PartyServicer Data Forms. Of the 45, the Department anticipates that 28 respondents will be for-profit servicers, 5 respondents will be not-for-profit servicers, 2 respondents will be State servicers and 10 respondents will be individuals. The Department estimates the total burden for these new 45 Third-PartyServicers to provide the completed form will add 74 additional burden hours to OMB Control Number 1845-0130.

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of Respondent** | **Number of Responses** | **Time/Response** | **Total Time** |
| For-profit servicer | 28 | 120 minutes | 56 hours |
| Not-for-profit servicer | 5 | 90 minutes | 8 hours |
| State agencies | 2 | 45 minutes |  2 hours |
| Individuals | 10 | 45 minutes | 8 hours |
| **Sub Total for new submissions** | **45** |  | **74 hours** |

Total for renewal of OMB Control Number 1845-0130

|  |  |  |
| --- | --- | --- |
| **Type of Respondent** | **Number of Responses** | **Total Time** |
| For-profit servicer | 203 | 144 hours |
| Not-for-profit servicer | 29 |  20 hours |
| State agencies |  11 |  7 hours |
| Individuals | 34 |  20 hours |
| **Total** |  **277** | **191 hours** |

Previous burden assessment totals

|  |  |  |
| --- | --- | --- |
| **Type of Respondent** | **Number of Responses** | **Total Time** |
| For-profit servicer | 85 | 48 hours |
| Not-for-profit servicer |  8 |  3 hours |
| State agencies |  4 |  2 hours |
| Individuals | 10 |  3 hours |
| **Total**  |  **107** | **56 hours** |

Difference

|  |  |  |
| --- | --- | --- |
| **Type of Respondent** | **Number of Responses** | **Total Time** |
| For-profit servicer | 118 | 96 hours |
| Not-for-profit servicer | 21 | 17 hours |
| State agencies | 7 |  5 hours |
| Individuals | 24 |  17 hours |
| **Total** | **170** | **135 hours** |

Estimated Annual Burden and Respondent Costs Table

| Information Activity or IC (with type of respondent) | 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) |
| --- | --- | --- | --- | --- | --- | --- |
| Individual | 34 | 34 | See above for breakout | 20 | $47.54 | $951 |
| For-Profit Servicer | 203 | 203 | See above for breakout | 144 | $47.54 | $6,846 |
| Private Servicer | 29 | 29 | See above for breakout | 20 | $47.54 | $951 |
| State Agencies | 11 | 11 | See above for breakout | 7 | $47.54 | $333 |
| Annualized Totals | 277 | 277 |  | 191 |  | $9,081 |

Bureau of Labor Statistics, U.S. Department of Labor, Occupational Outlook Handbook, Administrative Services and Facilities Managers,
at <https://www.bls.gov/ooh/management/administrative-services-managers.htm> (visited March 17, 2022).

***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.***

1. **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 are no additional costs. There are no systems requirements to respondents.

1. **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 are no additional costs to the Federal government.

1. **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.**

This is a request for the revision of information collection 1845-0130. This information collection will continue to provide necessary information on third-party servicers who provide Title IV, HEA services to eligible institutions and allow the Department to maintain oversight of the servicers and protect the interests of eligible institutions, eligible students and taxpayers. There has been no change to the supporting regulatory language. The Department has reevaluated the usage of the form and there is a resulting increase in the number of respondents and burden hours resulting in a program change. The Department now anticipates 277 respondents requiring 191 hours to complete or update the Third-PartyServicer Data Forms. This is an increase from the previous filing of 170 respondents/responses and 135 burden hours.

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Program Change Due to New Statute** | **Program Change Due to Agency Discretion** | **Change Due to Adjustment in Agency Estimate** |
| **Total Burden** |  | +41 | +94 |
| **Total Responses** |  |  | +170 |
| **Total Costs (if applicable)** |  |  |  |

1. **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.**

The results of this collection will not be published.

1. **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.

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

The Department is not requesting any exceptions to the “Certification for Paperwork Reduction Act Submissions” of OMB Form 83-1.

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) [↑](#footnote-ref-1)