

Background for 83C for 1845-0021 transferring reporting mechanism burden from 1845-0116.

**Annual Hour Burden for Respondents/Recordkeepers**  
**Section 685.301(c)--Reporting to the Secretary.**

Section 685.301(c) provides that institutions originating and disbursing loans under the Direct Loan Program must report a student's "payment data" to the Secretary. The term "payment data" is defined in Section 685.102(b) to mean "an electronic record that is provided to the Secretary by an institution showing student disbursement information". The Department has implemented this provision by requiring that institutions electronically report student and Direct Loan information to the COD System. For example, institutions will be required to report: the program's Classification of Instructional Programs (CIP) Code; the credential level of each program; the length of the program for which the loan is intended; the enrollment status of the borrower at the time the loan is disbursed; whether a loan is for a teacher certification program for which the institution awards no academic credential; whether a loan is for preparatory coursework necessary for enrollment in an undergraduate program; and whether the loan is for preparatory coursework necessary for enrollment in a graduate or professional program.

To estimate the total burden imposed on institutions of higher education, the Department estimated the average number of reports that each institution submitted to COD each business day (by institutional type, i.e., public, private, proprietary). We based our calculations of estimated burdens on a 248 business-day year (365 days, less 104 weekend days and 13 Federal holidays) and that institutions submit data in large batches, not separately, for each individual borrower. We estimate that the reporting will add 1 minute (0.02 hours) of burden per report.

When the ICR 1845-0116 was last renewed there were 5,161 institutions that disbursed Direct Loans during the 2018-2019 award year, 1,815 of them are public institutions. The average number of reports per day that public institutions submit is 2.73. We further estimate that reporting will add 24,577 hours (1,815 institutions multiplied by 248 business days, multiplied by 2.73 reports per day, multiplied by 0.02 hours per report).

When the ICR 1845-0116 was last renewed there were 5,161 institutions that disbursed Direct Loans during the 2018-2019 award year, 1,631 of them are private, not-for-profit institutions. The average number of reports per day that private, not-for-profit institutions submit is 1.29. We estimate that reporting will add 10,436 hours (1,631 institutions multiplied by 248 business days, multiplied by 1.29 reports per day, multiplied by 0.02 hours per report).

When the ICR 1845-0116 was last renewed there were 5,161 institutions that disbursed Direct Loans during the 2018-2019 award year, 1,715 of them are proprietary institutions. The average number of reports per day that proprietary institutions submit is 0.84. We further estimate that reporting will add 7,145 hours (1,715 institutions multiplied by 248 business days, multiplied by 0.84 reports per day, multiplied by 0.02 hours per report).

Collectively, as a result of the reporting requirements for public, private and proprietary institutions transferring from 1845-0116 to 1845-0021, the total burden associated with Section

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685.301(c), will increase the current burden calculation for 1845-0021 by 42,158 hours (24,577 hours for public institutions + 10,436 hours for private, not-for-profit institutions + 7,145 hours for proprietary institutions).

34 CFR 685.301(c) – Reporting to the Secretary

**State, Local, or Tribal Governments**

Public institutions - reporting to the COD System	34 CFR 685.301(c)	*	1,228,828	0.02	24,577
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**Not-for profits**

Not-for-profit institutions - reporting to the COD System	34 CFR 685.301(c)	*	521,790	0.02	10,436
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**Private Sector**

Proprietary institutions - reporting to the COD System	34 CFR 685.301(c)	*	357,269	0.02	7,145
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TOTAL 34 CFR 685.301(c)		*	2,107,88		42,158
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\*-The asterisk is used to avoid double counting the same respondent identified in section 685.309.

**Section 685.309(b)--Enrollment reporting process.**

Section 685.309(b) provides that eligible institutions that enroll a Direct Loan borrower must report information about the borrower’s enrollment to the Secretary. The Department has implemented these provisions by requiring institutions to electronically report, not less frequently than every other month, student and loan information to NSLDS. To ensure that the Department has the information to necessary to make that determination, institutions are required to report information to NSLDS. For example, institutions will be required to report: the CIP code and the credential level for the program in which a borrower is enrolled; the length of the program in academic years, weeks, or months (consistent with current institutional reporting in the COD System); and a more detailed enrollment status of the borrower (e.g., full-time, three-quarter-time, half-time, or less-than-half-time).

To estimate the total increase in burden imposed on institutions of higher education due to the reporting requirements under Section 685.309(b), we divided institutions into two groups--institutions that use enrollment servicers, which are more automated and take less time to report enrollment to the Department, and institutions that do not use enrollment servicers and therefore take longer to report enrollment to the Department. We assumed that each institution that reports enrollment does so every other month (as minimally required). We estimate that the reporting will, for institutions using an enrollment servicer, add 0.25 hours of burden per report. For institutions that do not use an enrollment servicer, we estimate that the reporting will add 0.5 hours of burden per report.

When the ICR 1845-0116 was last renewed there were 5,738 institutions that participated in title IV programs as of April 2019 and reported enrollment information 2,164 of them are public

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institutions. Of the 2,164 public institutions, we estimate 1,666 use enrollment servicers. For the 1,666 public institutions that use enrollment servicers, we estimate that reporting will add 2,499 hours (1,666 institutions multiplied by 0.25 hours per report, multiplied by 6 reports per year).

When the ICR 1845-0116 was last renewed there were 5,738 institutions that participated in title IV programs as of April 2019 and reported enrollment information 1,789 of them are private, not-for-profit institutions. Of the 1,789 private, not-for-profit institutions, we estimate 1,378 use enrollment servicers. For the 1,378 private, not-for-profit institutions that use enrollment servicers, we estimate that reporting will add 2,067 hours (1,378 institutions multiplied by 0.25 hours per report, multiplied by 6 reports per year).

When the ICR 1845-0116 was last renewed there were institutions that participated in title IV programs as of April 2019 and reported enrollment information 1,785 of them are proprietary institutions. Of the 1,785 proprietary institutions, we estimate 1,374 use enrollment servicers. For the 1,374 proprietary institutions that use enrollment servicers, we estimate that reporting will add 2,061 hours (1,374 institutions multiplied by 0.25 hours per report, multiplied by 6 reports per year).

When the ICR 1845-0116 was last renewed there were 5,738 institutions that participated in title IV programs as of April 2019 and reported enrollment 2,164 of them are public institutions. Of the 2,164 public institutions, we estimate 498 of them do not use enrollment servicers. For the 498 public institutions that do not use enrollment servicers, we estimate that reporting will add 1,494 hours (498 institutions multiplied by 0.5 hours per report, multiplied by 6 reports per year).

When the ICR 1845-0116 was last renewed there were 5,738 institutions that participated in title IV programs as of April 2019 and reported enrollment information 1,789 of them are private, not-for-profit institutions. Of the 1,789 private, not-for-profit institutions, we estimate 411 of them do not use enrollment servicers. For the 411 private, not-for-profit institutions that do not use enrollment servicers, we estimate that reporting will add 1,233 hours (411 institutions multiplied by 0.5 hours per report, multiplied by 6 reports per year).

When the ICR 1845-0116 was last renewed there were 5,738 institutions that participated in title IV programs as of April 2019 and reported enrollment information 1,785 of them are proprietary institutions. Of the 1,785 proprietary institutions, we estimate 411 of them do not use enrollment servicers. For the 411 proprietary institutions that do not use enrollment servicers, we estimate that reporting will add 1,233 hours (411 institutions multiplied by 0.5 hours per report, multiplied by 6 reports per year).

Collectively, as a result of the reporting requirements transferring from 1845-0116 to 1845-0021, the total burden associated with Section 685.309(b), under 1845-0021, will increase from the current burden calculation by 10,587 hours (2,499 hours for public institutions using enrollment servicers + 2,067 hours for private, not-for-profit institutions using enrollment

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servicers + 2,061 hours for proprietary institutions using enrollment servicers + 1,494 hours for public institutions not using enrollment servicers + 1,233 hours for private, not-for-profit institutions not using enrollment servicers + 1,233 hours for proprietary institutions that do not use enrollment servicers).

34 CFR 685.309(b)

**State, Local, or Tribal Governments**

Public institutions - reporting to NSLDS - institution uses enrollment servicer	34 CFR 685.309(b)	1,666	9,996	0.25	2,499
Public institutions - reporting to NSLDS - institution does not use enrollment servicer	34 CFR 685.309(b)	498	2,988	0.50	1,494

**Private Sector**

**Not-for profits**

Not-for-profit institutions - reporting to NSLDS - institution uses enrollment servicer	34 CFR 685.309(b)	1,378	8,268	0.25	2,067
Not-for-profit institutions - reporting to NSLDS - institution does not use enrollment servicer	34 CFR 685.309(b)	411	2,466	0.50	1,233

**Business or other for-profits**

Proprietary institutions - reporting to NSLDS - institution uses enrollment servicer	34 CFR 685.309(b)	1,374	8,244	0.25	2,061
Proprietary institutions - reporting to NSLDS - institution does not use enrollment servicer	34 CFR 685.309(b)	411	2,466	0.50	1,233

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TOTAL 34 CFR 685.309(b)		5,738	34,428		10,587
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