SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

Special Education - Individual Reporting on
Regulatory Compliance Related to the Personnel Development Program
Service Obligation

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.**

   1a. Circumstances Making the Collection of Information Necessary

   This request is for a revision of the existing approved form (1820-0686).

   In order to ensure that OSEP is meeting the needs of children with disabilities and their families, OSEP needs to collect data on the results of its grant awards. These data include the number and characteristics (e.g., minority status, related professional experience) of professionals trained and the program outcomes (e.g., program completion, certification, employment in area supported by training). In addition, section 662 of IDEA requires OSEP to collect data to confirm that scholars who receive funding under this program complete their service obligation requirements. ED is responsible for collecting the necessary information, verifying the completion of the service obligation, and referring scholars to the Accounts Receivable and Bank Management Division (ARBMD) for repayment, if necessary.

   These data are used to assess program effectiveness and efficiency, and to inform performance reporting under 34 CFR 75.110. The data will provide information on the supply of the OSEP-funded projects nationally, within each state, and within and across personnel categories, including special educators certified to teach children with disabilities, university faculty, related-service personnel, preschool service providers, paraprofessionals, administrators and other personnel (see Question 2, below).

   To collect the needed data, OSEP created the Personnel Development Program Data Collection System (PDPDCS). Through the PDPDCS, the grantees, scholars, and employers report data electronically.

   1b. Authorization for Collection

   This data collection is authorized by the following Public Laws:

The information is being collected under the authority of the *Individuals with Disabilities Education Act (IDEA)* (20 U.S.C. 1462) and the implementing service obligation regulations at 34 CFR Part 304, as well as reporting requirements under 34 CFR 75.110. In particular, these sections authorize this collection:

1) The service obligation requirement of the Personnel Development Program can be found in IDEA, Public Law 108-446, section 662(h)(1) which states that "Each application for assistance…shall include an assurance that the eligible entity will ensure that scholars who receive a scholarship under the proposed project agree to subsequently provide special education and related services to children with disabilities, or in the case of leadership personnel to subsequently work in the appropriate field, for a period of two years for every year which the scholarship was received or repay all or part of the amount of the scholarship, in accordance with regulations issued by the Secretary. Section 662(h)(3) "Secretary's responsibility.— The Secretary—(A) shall ensure that individuals described in paragraph (1) comply with the requirements of that paragraph."

a) For scholarships made from grants made in fiscal year (FY) 2006 and every year thereafter, 34 CFR 304.23 through 304.30, which implements section 662(h) of IDEA for those fiscal years; and
b) For scholarships made from FY 2005 grants, the notice published in the Federal Register on March 25, 2005 (70 FR 15306), which implements section 662(h) of IDEA for that fiscal year.

2) Public Law 108-446, section 662(a) (20 U.S.C. 1462) "The Secretary shall, on a competitive basis, make grants to, or enter into contracts or cooperative agreements with, eligible entities…to help address the needs identified in the State plan…for highly qualified personnel…to work with infants or toddlers with disabilities, or children with disabilities."

3) Public Law 108-446, section 682(c) (20 U.S.C. 1482) "The Secretary may use funds made available to carry out subpart 2 or 3 to evaluate activities carried out under subpart 2 or 3, respectively."

4) Education Department General Administrative Regulations (EDGAR) require that grantees cooperate in any evaluation of the program by the Secretary (EDGAR, section 75.591) (20 U.S.C. 1221e-3 and 3474).

1c. Review Type/Changes to the Collection

This submission represents a revision of the previously approved data collection. The proposed changes to this collection are described below. To reduce respondent burden, clarify instructions, and better align to service obligation regulations, OSEP proposes the following changes to the instruments.

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Grantee Data Collection (Scholar Record)
1. Remove the 3-digit Scholar Data Report ID for grants awarded in FY 2012 and earlier because this feature is no longer necessary due to improved cataloguing and reporting.
2. Remove the check box for grantees in section C to indicate that there have not been any changes to that scholar record in the last year because it is redundant.
3. Update question concerning scholar's gender in Section E to include the option for "choose not to answer" as an option within question 1. Introducing this language in the PDPDCS is intended to be more inclusive by providing respondents another option to the binary response options as well as still provide the higher-level data for reporting purposes.
4. Indicate that "Course completion only…" is only available for scholars who were in grants awarded in FY 2009 or earlier to align with OSEP's requirements.
5. Remove the check box for grantees in section G to indicate that there have not been any changes to that scholar record in the last year because it is redundant.
6. Include option to select PDF upload or digital version of the Exit Certification in section I.
   Note: A change request will be submitted to update Section E to comply with OMB's Initial Proposal for Updating OMB's Race and Ethnicity Statistical Standards released on January 27, 2023 only after the final OMB Race and Ethnicity Statistical Standards is released.

Scholar Data Collection (Scholar Training and Employment Record)

1. Add a link to the digital scholar agreements (Pre-Scholarship Agreement and/or Exit Certification) stored within the PDPDCS for the scholar to reference.
2. Remove checkbox for scholars to indicate that they have reviewed the information in sections A-C because it is redundant.
3. Remove "Verify Service Obligation Details" question because it is redundant.
4. Remove link to view the scholar's Pre-Scholarship Agreement because it has been moved to the top of the page.
5. Insert "Notice of Intent" Question. This question is being added to the scholar training record to understand the reason(s) that scholars use their 5-year grace period. This brief question will:
   a. Inform OSEP staff of the progress of scholars, understand which factors may influence their ability to obtain eligible employment, and identify specific training or policy areas that may require additional review to improve scholars' ability to obtain eligible employment; and

    b. Help program scholars understand available options according to the regulations after completing their training program, including submitting eligible employment, referral for cash payback, or submitting a deferral or exception request;

6. Remove Reporting Requirements language and checkbox because it is redundant.

Grantee/Scholar Data Collection (Pre-Scholarship Agreement)

1. No changes made.

Grantee/Scholar Data Collection (Exit Certification)

1. Show the Exit Certification page, which is an optional form that is pre-filled with the information from sections A-D. The form only requires that the grantee select the scholar's exited status and the date of exit, and then it can be sent to the scholar for review and signing electronically.

Employer Data Collection (Employment Verification Record)

1. No changes made.

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.**

There are three primary purposes for the data that are being collected. The first use is to fulfill requirements for performance reporting under 34 CFR 75.110. Grantees are required to report on their progress toward meeting the objectives and goals established for each ED grant program. However, OSEP needs data directly from scholars and their employers in addition to grantee data for performance reporting.

The second use of the data is to fulfill the requirements of IDEA 2004 and the corresponding regulations (Service Obligations Under Special Education – Personnel Development to Improve Services and Results for Children with Disabilities 2006) to verify the fulfillment of the service obligations of scholars who receive scholarships from Institutions of Higher Education (IHEs) (grantees) under OSEP's Personnel Development to Improve Services and Results for Children with Disabilities program. These requirements include grantee, scholar and employer input as well as referral of scholars to the ARBMD for repayment of part or all of the scholarship received, if they are not fulfilling their obligations through service.

Finally, the data collected are used by OSEP for project monitoring and program improvement, and to provide information on the characteristics of teachers and other

personnel supported in these preparation programs and the outcomes of the grants (program completion, certification, employment in the area supported by training, etc.). Collection of these data is critical in assessing accountability for the grant program. These data also serve as the primary source of information for OSEP to target program areas in need of improvement.

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.**

   OSEP collects all data in a web-based data collection system which is maintained on a secured server. Grantees and scholars log into the PDPDCS using their email address and a password to enter data. Employers are provided secure links to review and verify employment. The system is designed to minimize burden on respondents by programmatically skipping inapplicable items and storing and displaying data previously entered. For many items, users simply review data previously entered and verify its continued accuracy. The data collection instruments and frequently asked questions will be available online to respondents.

   PDPDCS implemented electronic Pre-Scholarship Agreement and Exit Certification forms to reduce burden. Allowing grantees and scholars to complete both forms within the system negated the need to print, sign, redact, and upload the agreements to the system. Significantly reducing the level of effort required and improving the validity and reliability of agreements submitted.

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.**

   There is no duplication of reporting efforts. The information requested for this reporting is not collected or reported elsewhere. Data to determine whether a school is "high-need" is not collected from any respondents to reduce burden. These demographic data are gathered from ED's Common Core of Data by the contractor. Determining a "high-need" school is necessary to calculate the performance measure on the number and percentage of scholars who complete the program and who are employed in high-need schools.

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.**

    The information requested rarely involves the collection of information from small businesses. There may be some employers classified as small businesses; however, the Employment Verification Record was designed to solicit only the information necessary to respond to program requirements. Thus, the burden of reporting is minimized to only those elements necessary to meet Federal requirements for budget and program activity data. In addition, this system utilizes a secure online tracking system which allows employers to easily review information already entered by the scholar and then submit verification or provide revisions.

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.**

    Scholar follow-up is necessary for the program office to monitor service obligation requirements. To require less frequent data collection would result in the inability of the Secretary to assure that grantees and scholars are complying with the statutory requirements for service obligation. In addition, these data are needed annually so that OSEP can meet its PDP annual program performance measure reporting requirements under 34 CFR 75.110.

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;**

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- **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.**

There are no special circumstances that would require the collection to be conducted in a manner inconsistent with OMB guidelines.

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.

   This updated Information Collection Request is not associated with rulemaking, as a result official public comment has not occurred. Significant input and feedback have been provided by current system users through optional feedback surveys and an analysis of Help Desk inquiries. Additionally, OSEP project officers have provided feedback on the changes proposed in Question 1 to ensure no undue burden is placed and the data that is being

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collected will better serve the program. Both 60-day and 30-day Federal Register notices will be published.

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 to respondents in support of the data collection.

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.**

    All data collection activities will be conducted in full compliance with ED regulations. Data collection activities will be conducted in compliance with The Privacy Act of 1974, P.L. 93-579, 5 USC 552 a; the "Buckley Amendment," Family Educational and Privacy Act of 1974, 20 USC 1232 g; and related regulations, including but not limited to: 41 CFR Part 1-1 and 45 CFR Part 5b and, as appropriate, the Federal common rule or ED's final regulations on the protection of human research participants. This is to maintain the confidentiality of data obtained on private persons and to protect the rights and welfare of human research subjects as contained in ED regulations. The Privacy Impact Assessment (PIA) for the Personnel Development Program Data Collection System, was published on October 29, 2019. In accordance with the Privacy Act of 1974, a system of records (SORN) entitled the "Personnel Development Program Data Collection System (PDPDCS)" (18-16-04) was published on July 10, 2019.

    Project staff and contractors will adhere to the regulations and laws regarding the confidentiality of individually identifiable information. In addition, the Personnel Development Program Data Collection System was reviewed by ED's Office of the Chief Information Officer (OCIO) for compliance with the Federal Information Security

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[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)

Management Act (FISMA), OMB Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance. The system most recently received an Authorization to Operate (ATO) on February 8, 2022.

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.**

Questions regarding Social Security Number (SSN), employment status, and service obligation status may be considered sensitive. However, SSN, employment and service obligation status questions are necessary to directly respond to performance measures and program requirements for service obligation. In addition, the Accounts Receivable and Bank Management Division (ARBMD) and the Department of Treasury require SSNs when scholars are referred, because they did not repay their service obligation through eligible employment and must, therefore, repay part or all of the funding they have received.

Race/ethnicity/gender data are also collected; however grantees are not required to respond to these items. The IDEA 2004 emphasizes that the training of professionals in the area of special education by minority individuals is essential if the nation is to obtain greater success in the education of minority children with disabilities (Section 601(10)(D)). Collecting these data will assist in analyzing and increasing the number of minorities trained in special education.

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.**
   - **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.**

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- **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.**

Three different sources—the grantees, scholars and employers—will be asked to report or verify information in the PDPDCS. This can be done entirely electronically since the introduction of previously paper forms, which has also reduced the burden hours per respondent. For all respondents, much of the information in these forms are pre-populated and require only verification.

Table A-1 (pg. 13) presents the **maximum** annual burden estimates of 10,874 hours for grantees, scholars, and employers. The program office estimates that 414 active grantees, 13,581 scholars, and 13,581 employers will respond to this collection based on data from FY 2019 – FY 2022. On average, each of the 414 grantees will have about 21 scholars in their cohort over the course of the 5-year grant. Grantees are encouraged to enroll scholars within the first 2-3 years of their grant to ensure all scholars are able to complete the program on time. To assume the maximum burden estimate, the following data is based on an average Year 3 of a PDPDCS grant.

For burden estimates, we assume that grantees have an hourly rate of $40 based on the average salary for administrators and professors in postsecondary special education. We assume an average hourly rate of $30 for scholars, understanding that some scholars may not yet be employed, some may be earning more as administrators, and some may be earning less as teachers or while in deferment. Given these rates and the hour estimates above, the maximum estimated annual burden is $379,198 across all grantees, scholars, and employers. Below we describe how these estimates were derived for each instrument or activity.

Grantees: Pre-Scholarship Agreement and Scholar Record

The Pre-Scholarship Agreement (PSA) is completed only once per scholar per grant. These agreements are completed and signed by both the project director and the scholar at the time the scholar enrolls in the grant-supported training. During Year 3 of a PDPDCS grant, a grantee would likely enroll the remaining half of their 21 scholars, so they would need to complete about 11 PSAs.

Grant project directors can choose to either upload a PDF of the signed PSA or use the digital PSA form within the PDPDCS. We estimate that it takes grantees 20 minutes to meet with the scholar, sign the form, and complete the PDF upload or 10 minutes to complete the digital PSA form. Our data shows that grantee use of each form is split evenly (about 50%

use the PDF upload and about 50% use the digital form), for an average of 15 minutes to complete.

After the PSA process, the grantee must then complete the scholar record in the PDPDCS for each scholar. We estimate it will take 15 minutes for the grantee to complete the scholar record, for a total of 30 minutes to complete both the PSA and the scholar record.

Grantees: Update Scholar Record

We estimate that each of the 414 active grantees will respond to this data collection instrument annually. To identify maximum burden, during Year 3 we estimate that the grantees will need to update the scholar record for the 10 scholars that were enrolled during Year 2. During the annual update, grantees will just be reviewing and updating information already entered in the Pre-Scholarship Agreement and Scholar Record phase.

Grantees: Exit Certification

The Exit Certification (EC) is completed only once per scholar per grant. The exit certifications are completed and signed when a scholar completes the grant training program or exits prior to completion. On average, grantees exit about 30% of their scholars each year (about 7 scholars a year), which accounts for both scholars who graduate and scholars who exit prior to completion.

Grant project directors can choose to either upload a PDF of the signed EC or use the digital EC form within the PDPDCS, which is pre-populated with data from the completed scholar record. We estimate that it takes grantees 15 minutes to meet with the scholar, sign the form, and complete the PDF upload or 5 minutes to complete the digital EC form. Our data shows that grantee use of each form is split evenly (about 50% use the PDF upload and about 50% use the digital form), for an average of 10 minutes to complete.

Scholars: Complete Pre-Scholarship Agreement

The PSA is completed and signed only once per scholar per grant. The grantee will determine whether to use the PDF upload PSA or the digital PSA and either meet with the scholar in person to complete the PDF form or connect virtually to use the digital PSA form. We estimate it will take scholars 20 minutes to complete the PSA in-person and 10 minutes to complete the digital PSA, for an average of 15 minutes to complete.

Under the assumption that for maximum burden in Year 3, each of the 414 grants will enroll about half of their cohort (11 scholars), it follows that that 4554 scholars will need to complete the PSA that year.

Scholars: Update Scholar Training and Employment Record

Scholars can log into the system and begin to verify and update their contact and training information as soon as they are enrolled in the program and submitted by the grantee in the

system. Per program regulations, scholars may begin fulfilling their service obligation through eligible employment after they have completed one full-time academic year of the program. Once a scholar enters their employment, they are then expected to resubmit their employment record every 6 months until their obligation is fulfilled or create a new employment record if they change jobs. We anticipate it will take scholars about 15 minutes to create a new employment record and about 5 minutes to resubmit it, for an average of 10 minutes per year.

The number of scholars entering data in any given project year will vary but may be as many as 13,581 scholars across all grants in the PDPDCS. There are currently 13,581 scholars in the database who have yet to fulfill their service obligation and thus should be updating their Scholar Training and Employment Record twice a year.

Scholars: Exit Certification

The EC is completed and signed only once per scholar per grant. The grantee will determine whether to use the PDF upload EC or the digital EC and either meet with the scholar in person to complete the PDF form or connect virtually to use the digital EC form. The information within the EC is taken directly from the scholar record, so the scholar should already be familiar with it. We estimate it will take scholars 10 minutes to complete the EC in-person and 5 minutes to complete the digital EC, for an average of about 7.5 minutes to complete.

Under the assumption for maximum burden in Year 3, each of the 414 grants will enroll about half of their cohort (11 scholars), so it follows that that 4554 scholars will need to complete the EC that year.

Employers: Employment Verification Record

For employers, the scholar initiates employment verification annually. The employer then reviews the information entered by the scholars and indicates whether they agree or disagree with it. The estimate assumes the maximum amount of burden, meaning all 13,581 scholars submitting employment every 6 months. However, some scholars: a) exercise their allowable grace period; b) do not stay employed in education; or c) enter deferment due to an approved reason. Therefore, the number of employers asked to provide verification may be substantially lower than the number of scholars that completed one academic year of the PDP training grants. We anticipate the employers' burden to be 10 minutes per scholar per year.

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Table A-1 Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Estimated Number of Respondents	Number of Responses per Respondent	Estimated 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)
Complete Pre-Scholarship Agreement and Scholar Record (Grantee)	414	11	4,554	0.5	2,277	$40	$91,080
Update Scholar Record (Grantee)	414	10	4,140	0.1	414	$40	$16,560
Complete Exit Certification (Grantee)	414	7	2,898	0.15	434.7	$40	$17,388
Complete Pre-Scholarship Agreement (Scholar)	4,554	1	4,554	0.25	1,138.5	$30	$34,155
Update Scholar Training and Employment Record (Scholar)	13,581	2	27,162	0.15	4,074.3	$30	$122,229
Complete Exit Certification (Scholar)	2,898	1	2,898	0.125	362.25	$30	$10,868
Employment Verification Record (Employer)[1]	13,581	2	27,162	0.08	2173	$40	$86,918
Annualized Totals	35,856	34	73,368		10,874		$379,198

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.

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.)

We do not anticipate additional costs to respondents resulting from this collection other than that already reported in Question 12, including capital or start-up costs, or operation, maintenance, or purchase of services. It is assumed that all respondents have access to a computer either through the grantee Institution of Higher Education or their place of employment. The data collection contractor maintains a toll-free Help Desk number to allow respondents reliable access to support services. This Help Desk could assist a respondent without reliable access to a computer. Some respondents, depending on the technology used, may bear some cost of the communication (e.g., cell phone or email service costs); however, it is not possible to identify a specific cost given the range in service options.

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.

The total annual cost to the Federal government reflects the combined costs for OSEP to contract the data collection and reporting tasks and provide management and oversight of that contract (see Table A-2 below).

Table A-2. Total Annual Cost to Federal Government by Type of Cost

Type of Cost	Cost
OSEP Staff (salaries)	$152,221.50
Contractor Data and Reporting Services (Fixed price)	$1,113,395.24
Total	$1,265,616.74

OSEP has secured a fixed price contract with AnLar and Westat to create and manage the online data collection system. The fixed cost for this contract is $1,113,395.24 for Base Year (July 1, 2022 – June 30, 2023). These costs include the development and maintenance of the system, support for respondents, and preparation of reports. The majority of communications with respondents will be electronic; however, scholars who do not respond to electronic or telephone communications will be sent follow-up letters. The costs for those mailings are included in the contract.

The PDP program office maintains a program specialist (.5 FTE) whose function is to manage the contract and 14 tasks. This program position is a GS-14, which, in 2023, ranges from $132,368 to $172,075 in annual salary for the Washington D.C. locality. OSEP staff salaries also include the estimated cost of an additional person (GS-14) assigned to support the contract on, in particular, debt referrals.

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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).

There is an adjustment increase of 3,621 annual burden hours and an adjustment increase of 43,406 responses; however, the time per response has decreased due to program changes. There is a program change decrease of 1,075 burden hours and decrease of 4,300 responses. These adjustments and changes are a result of:
1. An increase in the number of grants and scholars in the PDPDCS;
2. Introducing the digital agreements option to decrease burden; and
3. Updated calculations to more accurately describe each PDPDCS user's experience.

Increase in Grants and Scholars

Our calculations show an adjustment from 345 to 414 active grantees and 10,841 to 13,581 scholars since the last OMB package was submitted. The PDP program has more active grants participating in the system, which has also led to an increase in the number of scholars that are eligible to fulfill their obligation through service.

Digital Pre-Scholarship Agreement and Exit Certification

PDPDCS began offering an option for grantees to use digital versions of the Pre-Scholarship Agreement (PSA) and/or Exit Certification (EC) in place of uploading a PDF of the signed form. Since the implementation of the digital option, there has been a marked decrease in security incidents. This is due to the removal of the possibility for grantees to accidentally upload the wrong PDF to another scholar's record, and the automatic redaction of scholars' social security numbers from digital forms. The digital option also allows grantees and scholars to complete the required forms virtually, eliminating the need to meet in person, and decreases the burden on grantees by removing the need to enter contact information and program information both on the PDF agreement and within the PDPDCS.

Grantees are not required to use the digital agreements at this time to ensure proper understanding of the process, generate buy-in, and avoid the need for scholars with existing paper agreements to re-sign digitally. Previously, it was expected that grantees were meeting with scholars in groups of 6 to discuss the program and service obligation requirements and, during that time, both the scholar and the grantee would sign the PSA. Using the digital version, grantees no longer need to meet with the scholars in person and can discuss any questions through the digital form process.

Our data has shown that about 50% of grantees use the digital forms and about 50% use the PDF upload forms. To streamline calculations while still accounting for this differential, we estimated the amount of times that each of the 414 grantees would need to complete the three main data collection steps during the most active year of their grant.

Updated Calculations

The burden calculations have also been adjusted to more accurately depict how grantees, scholars, and employers are entering data. Upon completing the PSA, grantees have 30 days to fill out and submit the scholar record in the PDPDCS. If they are using the digital version, these steps are already merged, so we combined the steps in our calculations. Then, during the subsequent data collection periods, grantees are expected to update the existing data in sections G-I annually until the scholar exits.

Additionally, PDPDCS now explicitly encourages scholars to verify their employment every 6 months instead of annually. This helps scholars meet their service obligations on time and avoid falling into repayment. The more frequent updates to the system result from scholars being more likely to remember to update their employment regularly and employers being more familiar with the process, leading to higher completion rates. This estimation doubles the previous number of scholar and employer responses, but decreases the burden hours as scholars are re-submitting previously entered information and employers are already familiar with the data and verification process. While scholars are not obligated to submit updates every 6 months, we use this assumption in calculating the maximum burden estimate to ensure more accurate data.

Table A-3. Adjustment and Program Changes

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden	N/A	-1,075	+3,621
Total Responses	N/A	-4,300	+43,406
Total Costs (if applicable)	N/A	N/A	N/A

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.**

The performance data will also be used on an annual basis to ED's Budget Service for and publication in ED's Budget Justification as well as made available through a public dataset on ED's website. Data for these publications will come from the final report produced each fiscal year. This report will include descriptive analyses of all variables collected. The number of scholars and percentages, as well as measures of central tendency when appropriate, will be presented by grant type in table format. The report will also provide data to monitor the fulfillment of scholar service obligation and grantee and scholar compliance with the program regulations. Bulleted text and an executive summary will be provided to highlight key findings. The final report will also include analyses of relationships among variables in the current fiscal year data set as well as comparative analyses of key variables across all data sets. All data will be in an aggregate form to protect PII and no PII information will be published. No complex analytical techniques will be used.

Table A-3 below summarizes the data collection and reporting timeline. Respondents will have continuous access to the online data collection system; however, analyses will be conducted on a snapshot of the data to document the previous fiscal year.

Table A-4. Data Collection and Reporting Timeline

Task	Month(s)
Respondents enter data	Ongoing
Snapshot taken of data	April
Draft reports for previous FY	June-July
Performance reporting for previous FY	July-August
Final report for previous FY	August
Public dataset published	September

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.**

This item is not applicable as the OMB expiration date will be displayed for each respondent type the first time they login or enter the system.

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

There are no exceptions to the certification statement.