SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

Teacher Education Assistance for College and Higher Education Grant Program (TEACH Grant Program)
Service Obligation Certification and Suspension Request Forms

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 U.S. Department of Education (the Department) is requesting a revision of the TEACH Grant Certification of Qualifying Teaching (Certification) and five Service Obligation Suspension Requests (Suspension Requests) currently approved under OMB No. 1845-0158.

   The College Cost Reduction and Access Act (Public Law 110-84) (the CCRAA) established the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program under Part A, Subpart 9, of the Higher Education Act of 1965, as amended (the HEA). The regulations governing the TEACH Grant Program are in 34 CFR 686.

   The TEACH Grant Program provides grants of up to $4,000 per year to undergraduate and graduate students who are completing, or who intend to complete, coursework necessary to begin a career in teaching. In exchange for receiving a TEACH Grant, a grant recipient must agree to complete four years of qualifying teaching service within eight years after ceasing enrollment at the institution where they received their TEACH Grants, and must regularly provide documentation of their progress toward satisfying the service obligation. Under conditions that are specified in the TEACH Grant Program regulations, a grant recipient may request and receive a temporary suspension of the eight-year period for completing the service obligation, and a grant recipient who is subject to an extended call to active duty military service may receive a discharge of some or all of the four-year service obligation. If a grant recipient fails to complete the service obligation or does not meet requirements for documenting the service obligation, the TEACH Grants that the individual received are converted to Direct Unsubsidized Loans that must be repaid, with interest charged from the date of each TEACH Grant disbursement.

   The following forms are included with this submission:

   - *TEACH Grant Certification of Qualifying Teaching*
   - *TEACH Grant Service Obligation Suspension Request: Residing or Being Employed in a Federally Declared Major Disaster Area*
   - *TEACH Grant Service Obligation Suspension Request: Enrollment in a Qualifying Program or Completing Teacher Licensure Requirements*
   - *TEACH Grant Service Obligation Suspension Request: Family and Medical Leave Act (FMLA) Condition*
   - *TEACH Grant Service Obligation Suspension Request: Military Spouse*
   - *TEACH Grant Service Obligation Suspension/Discharge Request: Military Service*

The requested revision to the information collection does not change the current number of respondents, responses, or burden hours. The Certification and the Suspension Requests reflect the regulatory provisions in 34 CFR 686.40, 686.41 and 686.42. The only substantive proposed change is in the Certification. The Consider Teachers Act of 2021 (Public Law 117-49) made certain changes to the provisions governing the TEACH Grant Program in section 420N of the HEA, one of which was to replace the previous requirement for a TEACH Grant recipient to comply with the requirements for being a highly qualified teacher as defined in section 9101 of the Elementary and Secondary Education Act of 1965 with a requirement for the recipient to meet all state certification requirements for teaching (which may include meeting such requirements through certification obtained through alternative routes to teaching). To reflect this statutory change, we have modified the Certification form by replacing all references to the highly qualified teacher requirement with the new requirement and removing the definition of "highly qualified teacher." We have also made a minor conforming change in the *TEACH Grant Service Obligation Suspension Request: Enrollment in a Qualifying Program or Completing Teacher Licensure Requirements* by removing a reference to the previously highly qualified teacher requirement.

We have made a minor formatting change to the *TEACH Grant Service Obligation Suspension/Discharge Request: Military Service* by adding check boxes for the certifying military official to identify the specific type of qualifying military service performed by the TEACH Grant recipient. On the currently approved form, there is a blank space for the official to manually enter the type of military service. We believe that adding the check boxes will make it easier for the certifying official to complete the form.

We are otherwise proposing no substantive changes to the Certification and Suspension forms included with this submission.

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

   The Department uses the information collected on the Certification to track the progress of a TEACH Grant recipient in completing the service obligation. The Department uses the information collected on the Suspension Request forms to determine eligibility of a TEACH Grant recipient to receive a temporary suspension of the period for completing the service obligation or a discharge of all or a portion of the service obligation based on extended military service. The Certification and Suspension forms will continue to be used for this purpose.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

   The collection of information does not involve the use of technological processes such as electronic submissions. Because the Certification and some of the Suspension Request forms require the TEACH Grant recipient to obtain a certification from an authorized official or attach supporting documentation, the United States Postal Service or an alternative mail delivery service currently provide the only practical means for a borrower to submit these forms. However, we will explore options for allowing electronic submission of Suspension Requests that do not require a certification from an authorized official or additional supporting documentation.

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 information available from other sources that can be used for the purposes described in Item 2.

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.**

   No small businesses are affected by this information collection.

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.**

   A TEACH Grant recipient must complete a Certification or Suspension form to show they have complete a year of qualifying teaching or that they meet the eligibility requirements to receive a temporary suspension of the service obligation period or a military service discharge of some or all of the service obligation. If a recipient did not complete the proper form, they could not receive the benefit allowed under the TEACH Grant regulations.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

   - **requiring respondents to report information to the agency more often than quarterly;**
   - **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
   - **requiring respondents to submit more than an original and two copies of any document;**
   - **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
   - **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
   - **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
   - **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The collection of this information will be conducted in a manner that does not involve any of the above conditions.

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.

On July 12, 2023, a notice was published in the Federal Register (Vol. 88, No. 132, page 442943) inviting public comment on this proposed forms. One commenter (the Learning Policy Institute) submitted several recommended changes to some of the forms included in this collection. The Department agreed with most of the commenter's recommendations and has updated the following forms to reflect the suggested changes:

- *TEACH Grant Certification of Qualifying Teaching*
- *TEACH Grant Service Obligation Suspension Request: Residing or Being Employed in a Federally Declared Major Disaster Area*
- *TEACH Grant Service Obligation Suspension Request: Enrollment in a Qualifying Program or Completing Teacher Licensure Requirements*

The other 3 forms in this information collection have not been changed.

The Department's responses to the comments submitted by the Learning Policy Institute have been added to the document submitted by the commenter, which is included with this submission. There has been no change in the number of respondents, responses or burden hours based on the changes made to the three forms.

The Department is now requesting the 30 day public comment period.

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

   No payments or gifts will be provided to respondents.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.[1] If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.**

    The Certification and Suspension forms include a Privacy Act Notice that (1) informs the TEACH Grant recipient of the statutory authority for the information collection, (2) explains that disclosure of the information is voluntary, but is required in order to determine the applicant's eligibility to receive a benefit under the TEACH Grant Program, and (3) identifies the third parties to whom the information may be disclosed, and explains the circumstances under which such disclosures may occur.

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.**

    The Certification and Suspension forms do not require a TEACH Grant recipient to provide any information that would be considered sensitive.

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.**

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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)

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. Use this site to research the appropriate wage rate. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

The total estimated annual reporting hour burden for this information collection is approximately 17,982 hours. The burden estimate for this collection was calculated as follows:

TEACH Grant Certification of Qualifying Teaching	
Estimated annual number of respondents:	53,013
Number of responses per applicant:	x 1
Hours per response:	x 0.33 (20 minutes)
Annual hour burden:	17,494 hours

TEACH Grant Service Obligation Suspension Request: Residing or Being Employed in a Federally Declared Major Disaster Area	
Estimated annual number of respondents:	500
Number of responses per discharge recipient:	x 1
Hours per response:	x 0.33 (20 minutes)
Annual hour burden:	165 hours

TEACH Grant Service Obligation Suspension Request: Enrollment in a Qualifying Program or Completing Teacher Licensure Requirements	
Estimated annual number of respondents:	589
Number of responses per discharge recipient:	x 1
Hours per response:	x 0.33 (20 minutes)
Annual hour burden:	194 hours

TEACH Grant Service Obligation Suspension Request: Family and Medical Leave Act (FMLA) Condition

Estimated annual number of respondents:	334
Number of responses per discharge recipient:	x 1
Hours per response:	x 0.33 (20 minutes)
Annual hour burden:	110 hours

TEACH Grant Service Obligation Suspension Request: Military Spouse

Estimated annual number of respondents:	25
Number of responses per discharge recipient:	x 1
Hours per response:	x 0.33 (20 minutes)
Annual hour burden:	8 hours

TEACH Grant Service Obligation Suspension/Discharge Request: Military Service

Estimated annual number of respondents:	34
Number of responses per discharge recipient:	x 1
Hours per response:	x 0.33 (20 minutes)
Annual hour burden:	11 hours

Total number of respondents	54,495
Total annual hour burden	17,982 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	54,495	54,495	.33	17,982	$22.26	$400,279
For-Profit Institutions	N/A	N/A	N/A	N/A	N/A	N/A
Private Institutions	N/A	N/A	N/A	N/A	N/A	N/A

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)
Public Institutions	N/A	N/A	N/A	N/A	N/A	N/A
Annualized Totals	54,495	54,495	.33	17,982	$22.26	$400,279

For individuals we have used the median hourly wage for all occupations, $22.26 per hour according to BLS. https://www.bls.gov/oes/current/oes_nat.htm#00-0000 .

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.)**

- **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 capital/startup costs to respondents, nor are there any annual costs to respondents associated with operating or maintaining systems or purchasing services.

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.

There is no significant annualized cost to the federal government. The Department's contract with its TEACH Grant servicer is not based on a fee-for-service model; rather, the Department pays the servicer based on performance metrics. The government incurs no additional costs merely as a result of this information collection.

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

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

The Department is not reporting any changes or adjustments. The burden estimates remain at 54,495 respondents and responses for 17,982 burden hours.

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

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results of this information collection will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Department is not seeking this approval.

18. 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.