

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

Teacher Education Assistance for College and Higher Education Grant Eligibility Regulations

- 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 College Cost Reduction and Access Act (the CCRAA), Pub. L. 110-84, established the Teacher Education Assistance for College and Higher Education (TEACH) Grant Program under Part A of the Higher Education Act of 1965, as amended (the HEA). The regulations for the TEACH Grant Program are in [34 CRF 686](#).

The following sections of the TEACH Grant regulations are included in this information collection: 686.4, 686.11, 686.32, and 686.34. This is a request for an extension of the existing burden hours in OMB Control Number 1845-0084.

The regulations in 686.4 require an institution that ceases to participate or becomes ineligible to participate in the TEACH Grant program during an award year to report to the Department of Education (the Department) within 45 days after the effective date of the loss of eligibility.

The report must include the name of each TEACH Grant eligible student, the amount of the TEACH Grant funds paid to each student for that award year, and the amount of TEACH Grant funds due each eligible student through the end of the payment period. Also, the institution must provide an accounting of all TEACH Grant expenditures for that award year to the date of termination.

The regulations in 686.11 establish that in addition to meeting the student eligibility requirements, in order to receive a TEACH Grant the applicant must submit the designated application, sign a TEACH Grant agreement to serve or repay (this burden is captured under OMB Control Number 1845-0083), and enroll in a TEACH Grant eligible institution. In addition, the grant recipient must either maintain a cumulative grade point average of 3.25 on a 4.0 scale during each payment period or score above the 75th percentile on at least one of the battery of nationally- normed standardized test.

The regulations in 686.32 require an institution to provide initial, subsequent, and exit counseling to each TEACH Grant recipient and maintain documentation substantiating the counseling requirements.

The regulations in 686.34 require the institution to promptly provide written notification to a student requesting repayment of any overpayment that the institution does not have responsibility to repay. The regulations also require that the institution refer the student to the Department if the student does not take positive action to promptly resolve the TEACH Grant overpayment.

In addition, in 686.34 there is conversion counseling requirements for grant recipients whose TEACH Grants are converted to Direct Unsubsidized Loans. This conversion counseling material is provided directly to the recipient from the Department based on the last address provided by the recipient.

There have been no further changes to the TEACH Grant Initial/Subsequent, Exit, or Conversion counseling requirements since the publication of the 2020 final rule.

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 TEACH Grant program is maintained at participating institutions of higher education. The majority of the collection requirements are for recordkeeping at the institution. The required reporting to the Department relates to ceasing participation or losing eligibility to participate.

The recordkeeping and reporting requirements of these regulations assure accountability of program participants for proper program administration and justify the payment of funds by the federal government. The collection of this information aids in assuring that the Federal dollars are not lost to fraud, waste or abuse.

The information in the conversion counseling is provided to TEACH Grant recipients whose grant is converted to a loan and reiterates the rights and responsibilities of the recipients in the repayment of the Direct Unsubsidized Loan.

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 required enrollment for institutions of higher education in the TEACH Grant program is done through the e-Application process, the disbursement and overpayment reporting is done through the Common Origination and Disbursement system. These are all electronic systems operated by the Department.

The regulations require that the conversion counseling be provided electronically as well as in written form to the grant recipient.

- 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.**

These regulations were created with the participation of affected parties who had a vested interest in avoiding duplication. The required information is not captured in any other Department system.

- 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 impacted by this 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.**

The recordkeeping and reporting requirements are necessary to ensure accountability of program participants for proper program administration and less frequent collection could impair accountability of program participants. The provision of the electronic conversion counseling provides information to recipients about the loan repayment obligations and options available to them and aid in the repayment of the loan, minimizing issues with defaulted loans.

- 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 is consistent with the guidelines in 5 CFR 1320.5(d)(2).

- 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.

The regulations were developed during the negotiated rulemaking and the final rule processes and have not changed since those processes.

On July 24, 2023 a notice was published in the Federal Register (Vol 88, No. 140, pages 47486-47487) inviting public comment on the burden estimates of this information

collection. No substantive comment was received. There is no change to the estimated number of respondents, responses, or burden hours for this 30-day public comment request.

The Department is now requesting a 30-day comment period to providing the public with an opportunity to submit comments on the burden.

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

No payments of gifts will be provided to the 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.

A Privacy Act Notice is included on the Free Application for Federal Student Aid (FAFSA) application form and the TEACH Grant Agreement to Serve or Repay, both of which are used to determine program eligibility. In both of these forms, the applicant is informed of the statutory authority for collecting the information requested. Although the disclosure of the information is voluntary, the recipient is informed that in order to be considered for TEACH Grant funds, the information must be provided.

The information provided is used to verify the grant recipient's identity, to determine the grant recipient's eligibility to receive the TEACH Grant benefits, and in those cases where a TEACH Grant is converted to a Direct Unsubsidized Loan, to permit the servicing of the borrower's loan(s), and to locate the borrower and collect on the loan(s) if the loan(s) become delinquent or default. A listing of the persons and entities to which the

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)

information may be disclosed and for what purposes the information may be disclosed is also included.

- 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 Department is not requesting any sensitive data.

- 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.**
- **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.**

TEACH Grants:

Section 686.4 – Institutional participation

Burden Assessment:

We are continuing to use 4 as the estimated number of institutions that will cease to participate or lose eligibility to participate in the program. And that the 10 hour of burden per institution needed to create and provide final reporting remains unchanged.

Affected Entities:

	# of Respondents	# of Responses	Hours/ response	Total hours
Business or other for-profits	1	1	10	10
Not-for-profits	2	2	10	20
Public institutions	1	1	10	10
TOTAL	4	4		40

Section 686.11 - Eligibility to receive a grant

There are several categories of grant recipients where the cumulative grade point average of 3.25 must be maintained for each payment period. Those categories are:

I. The initial payment period:

The final cumulative high school GPA for a first term undergraduate recipient -

The TEACH eligible institution must document the student's secondary school GPA from an LEA, an SEA or other State agency, a public or private high school, or in the case of a home schooled student, obtain documentation of the secondary school GPA from the parent or guardian.

The undergraduate cumulative GPA for either the post-baccalaureate or graduate student recipient -

The TEACH eligible institution must document the student's undergraduate school GPA.

The transfer student cumulative GPA as determined by the current TEACH Grant eligible institution -

The TEACH eligible institution must document the student's GPA based upon the method established by the institution to accept coursework completed from any prior postsecondary institution that it accepts.

II. Subsequent payment periods:

The cumulative GPA based on courses taken at the TEACH eligible institution through the most-recently completed payment period, or

III. Alternatives to the cumulative GPA:

Scoring above the 75th percentile of at least one of the battery of test from a nationally-normed standardized test, or

The grant recipient is currently a teacher or retiree who is applying for a TEACH Grant to obtain a master's degree in an eligible TEACH Grant program.

Burden Assessment:

We continue to anticipate 786 respondents will work with 193,767 respondents to apply for participation in the TEACH Grant program for an 11,914 burden hour estimate.

Affected Entities:

	# of Respondents	# of Responses	Total hours
INDIVIDUALS:			
High School GPA			
Home school parents	13	13	4
INSTITUTIONS:			
Business or other for-profits	9	1,938	119
Not-for-profits	424	106,559	6,549
Public institutions	340	85,257	5,242
TOTAL:	786	193,767	11,914

Section 686.32 – Counseling requirements

Types of TEACH Grant counseling:

In-person: We continue to anticipate that an in-person presentation (individual or group) will take approximately .33 hours (20 minutes) per presentation. We continue to anticipate that institutions new to the program will require 10 hours to develop the required in-person presentation materials that will cover the three types of counseling required. We continue to anticipate that participating institutions will annually update the in-person presentation materials that will cover the three types of counseling required and will require 1 hour for review and revision.

Audio-visual (A/V) presentation: We continue to anticipate that the A/V presentation will take approximately .33 hours (20 minutes) per presentation. We continue to anticipate that institutions new to the program will require 6 hours to develop the A/V presentation materials that will cover the three types of counseling required. We continue to anticipate that it will take 1 hour annually to review and update an A/V presentation that will cover the three types of counseling required.

Interactive (on-line): We continue to anticipate that the on-line presentation will take approximately .33 hours (20 minutes) per presentation. We continue to anticipate that institutions new to the program will require 7 hours to develop the on-line presentation that will cover the three types of counseling required. We continue to anticipate that it will take 1 hour annually to review and update an on-line presentation that will cover the three types of counseling required.

Affected Entities:

	# of	# of	Total
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	Respondents	Responses	hours
INDIVIDUALS:	36,976	36,976	12,202
INSTITUTIONS:			
Business or other for-profits	*	9	123
Not-for-profits	*	424	6,741
Public institutions	*	340	5,393
TOTAL:	36,976	37,749	24,459

The regulations also include a conversion counseling requirement for grant recipients whose TEACH Grants are converted to Direct Unsubsidized Loans. We are including additional burden based on the conversion counseling established in section 686.32(e).

We continue to anticipate that approximately 1,520 TEACH Grant recipients will either voluntarily convert their grant to a loan or will run out of time to complete the teaching obligation and have the grant converted to a loan. We do not believe there will be a significant increase or decrease in such activity.

We believe that it will take a TEACH Grant recipient the same approximate 20 minutes (.33 hours) to review the new conversion counseling materials as it takes them to review the other required counseling materials.

Affected Entities:

	# of Respondents	# of Responses	Total hours
INDIVIDUALS:	1,520	1,520	502

Section 686.34 - Liability for and recovery of TEACH Grant overpayments

We project that .1% of the TEACH Grant recipients will owe a TEACH Grant overpayment. However, all eligible institutions must have a written notice for requesting repayment of a TEACH Grant overpayment when a student has responsibility to repay along with notification that the student will become ineligible for additional Title IV, HEA program funds. The participating institutions must establish procedures to refer an overpayment when a student fails to make satisfactory repayment arrangements or fully repay the overpayment.

We estimate that it will take students .167 hours (10 minutes) to read the written notification and respond to the TEACH Grant overpayment notice. And we estimate that each participating institution will require .33 hours (20 minutes) to annually review the notification and make the required referrals.

Affected Entities:

	# of Respondents	# of Responses	Hours/ response	Total hours
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INDIVIDUALS:	31	31	.167	5
INSTITUTIONS:				
Business or other for-profits	*	9	.33	3
Not-for-profits	*	424	.33	140
Public institutions	*	340	.33	<u>112</u>
TOTAL:	31	804		260

*-This symbol is used to prevent the duplicate counting of the universe of participating institutions.

Current Burden Associated with the Regulations:

# of Respondents	# of Responses	#Burden Hours
39,317	233,844	37,175

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	38,540	38,540	.33	12,713	\$22.26	\$282,991.38
For-Profit Institutions	10	1,957	.13	255	\$48.05	\$12,252.75
Private Institutions	426	107,409	.13	13,450	\$48.05	\$646,272.50
Public Institutions	341	85,938	.13	10,757	\$48.05	\$516,873.85
Annualized Totals	39,317	233,844		37,175		\$1,458,390.48

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 .

For institutions we have used the median hourly wage for Education Administrators, Postsecondary, \$48.05 per hour according to BLS. <https://www.bls.gov/oes/current/oes119033.htm> .

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 additional costs not identified in item 12.

- 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 additional cost to the Federal government.

- 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.

	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)			

This is a request for an extension without change of the current burden of 39,317 respondents, 233,844 responses, and 37,175 burden hours.

- 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 result of the collection of information 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 Submission".