

**Table I for 1894-0009 Supporting Statement
Recordkeeping and Reporting Requirements in the
Education Department General Administrative (EDGAR) Regulations**

“CFR” refers to Code of Federal Regulations.

Section of 34 CFR and 2 CFR	Title	Description of Recordkeeping or Reporting Requirement	Recordkeeping Burden Hrs.	Reporting Burden Hrs.
200.308	Budget/ program revisions.	<p>2 CFR 200 of the Uniform Administrative Requirements applies to Institutions of Higher Education (IHEs), nonprofit organizations (NPOs), and hospitals. Of the approximately 7400 discretionary grants (new and non-competing continuation grants) that ED awards annually, 5,700 grants were awarded to IHEs, NPOs, and hospitals. Under 2 CFR 200.308 of the Uniform Administrative Requirements, very few project revisions require prior approval. It is estimated that ED will receive approximately 740 prior approval requests from grantees per year (represents 10% of the 7400 grants awarded annually) and that approximately 570 of those requests will be submitted by IHEs, NPOs, and hospitals (represents 10% of the approximately 5,700 grants awarded to IHEs, NPOs and hospitals annually).</p> <p>Additionally, under 34 CFR 75.261, all types of grantees including State Educational Agencies (SEAs), Local Educational Agencies (LEAs), and Federally Recognized Indian Tribal Governments may follow the regulations in 2 CFR 200.308 regarding extension of a project period. Section 200.308 allows grantees to initiate a one-time extension of their projects’ expiration date of up to 12 months without prior approval from ED. Grantees, however, must notify the Department that they intend to extend their grants and indicate the supporting reasons for the extension and the revised expiration date. Bases on FY 2016 time extension data from G5, the grant management system), approximately 590 grantees annually will receive this one-time extension of up to 12 months of their project periods.</p> <p>REPORTING BURDEN</p>		<p>(Prior Approval Requests: 570 responses x 1 hr. = 570 hrs.)</p> <p>(Time Extension Notifications: 590 responses X 1 hr. = 590 hours)</p> <p>Total Reporting Burden Hours for 2 CFR 200.308 = 1,160 hours</p>
200.318	Procurement Procedures.	<p>It is estimated that approximately 20% (1,140) of the 5,700 IHE, NPO and hospital recipients must keep records on procurement actions under their discretionary grants.</p> <p>RECORDKEEPING BURDEN</p>	<p>1,140 responses x 10 hrs. = 11,400 hrs.</p>	
200.323	Cost and price analysis.	Justification and burden hours for 2 CFR 200.323 are included under 2 CFR 318.		
200.318	Procurement records.	Justification and burden hours for 200.318 are included under 2 CFR 318.		
200.318	Contract	Justification and burden hours for 200.318 are included under 2 CFR 318.		

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**Table I for 1890-NEW Supporting Statement
Recordkeeping and Reporting Requirements in the
Education Department General Administrative (EDGAR) Regulations**

Section of 34 CFR and 2 CFR	Title	Description of Recordkeeping or Reporting Requirement	Recordkeeping Burden Hrs.	Reporting Burden Hrs.
200.344	Subsequent Adjustments.	It is estimated that approximately 10% (570) of the 5700 IHE, NPO and hospital recipients would have to make subsequent adjustments to records due to audits or other reviews. RECORDKEEPING BURDEN	570 responses X 10 hours = 5700 hrs.	
75.119 cross referenced to 76.656	Information needed if private school students participate.	It is estimated that approximately 10% (740) of 7400 ED discretionary grant recipients include students from private schools in their applications. This information would be a part of the original application narrative. REPORTING BURDEN		740 responses x 1 hr. = 740 hrs.
75.261	Extension of a project period.	It is estimated that annually, approximately 140 grant recipients will request a second (or more) extension of their project periods that requires prior approval from ED (based on FY 2019 time extension data from G5). Note that recipients under the four National Institute on Disability and Rehabilitation Research programs listed in 34 CFR 75.261 (b) of EDGAR must request prior approval for <i>any</i> time extension. The burden hours for any of these NIDRR grantees that request and receive a time extension are included with the burden hour calculations for one-time extension listed above under 2 CFR 200.308. REPORTING BURDEN		140 responses X 1 hr. = 140 hrs. (Note: the burden hours for time extension requests for grantees in the NIDRR programs listed under EDGAR, 75.261 (b) are included with the burden hours for one-time extensions listed under 2 CFR 200.308.
200.308	Changes.	It is estimated that approximately 10% (190) of 1900 State Educational Agencies (SEAs), Local Educational Agencies (LEAs) and Federally-Recognized Indian Tribal Governments will request changes		190 responses x 1 hr. = 190 hrs.

		to their projects that require prior approval from ED. Very few changes require prior approval and information from grantees.		
		REPORTING BURDEN		
200.317	Procurement.	It is estimated that approximately 20% (380) of the 1900 SEA, LEA and tribal government recipients must keep records on procurement actions under their discretionary grants.	380 responses x 10 hours = 3800 hrs.	
		RECORDKEEPING BURDEN		
		TOTAL BURDEN HRS. = 23,130	Total Recordkeeping Burden Hours = 20,900	Total Reporting Burden Hours = 2,230

NOTE:

- The burden hours for the following EDGAR and Uniform Administrative Requirements sections are accounted for in the burden hour calculation for the **ED 524B** and not included in this table (see separate Supporting Statement (1890-0004) for the burden hour calculation for the ED 524B):

34 CFR 75.118, 75.590, 75.720, and 2 CFR 200.328

- The burden hours for **34 CFR 75.117** are accounted for in the burden hour calculation for the **ED 524** and not included in this table (see separate Supporting Statement for the burden hours calculation for the ED 524 (1894-0008)).