

SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 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 Indian Education Professional Development (IEPD) Grants program provides grants to prepare and train Indians (*i.e., American Indians/Alaska Natives*) to serve as teachers and administrators. The specific goals of the IEPD program are to: 1) increase the number of qualified individuals in professions that serve American Indians/Alaska Natives; 2) provide training to qualified American Indians/Alaska Natives to become teachers, administrators, teacher aides, social workers, and ancillary education personnel; and 3) improve the skills of those qualified American Indians/Alaska Natives who already serve in these capacities. Individuals trained under this program must perform work related to their training and that benefits American Indian/Alaska Native people or repay all or a prorated portion of the assistance received under the program.

The Office of Indian Education (OIE) of the U.S. Department of Education (the Department) requests approval for a revision to this information collection due to the changes to the service payback regulations, which were amended in 2020. The new regulations can be found here: [Federal Register:: Indian Education Discretionary Grant Programs; Professional Development Program](#). OIE intended to submit this request sooner but was unable to due to staff turnover and understaffing, which caused the team to lose track of this open item. This request brings this oversight back into alignment with the requirements of the Paperwork Reduction Act. In addition, the U.S. Department of Education (the Department) also seeks approval of technical revisions intended to clarify some items and instructions.

Revisions due to changes to the regulations are found in the Service Payback Agreement. Revisions in the Grantee Reporting Form are technical edits and clarifications of items and language. Revisions in the Participant Training Information and Employment Reporting Form and Employment Verification Form are both technical edits and due to changes to the regulations.

The Office of Indian Education (OIE) is submitting this request for an extension of approval to:

- Ensure all IEPD participants understand the program regulations and that in exchange for receiving funds through the program they agree to the service/cash payback requirements;
- Collect contact and training information for all IEPD participants from IEPD grantees;
- Collect employment information from IEPD participants who are not in an approved and active deferment once they have exited the program; and
- Verify employment information with employers for all participants who are in service payback.

The updated forms and protocols contained in this package include the Service Payback Agreement, Grantee Reporting Form, the Participant Training Information and Employment Reporting Form, and the Employment Verification Form. The Department collects the information in these forms under the authority of section 7122 of the *Elementary and Secondary Education Act of 1965*, as amended; 20 U.S.C. 7442, and the implementing regulations at 34 CFR Part 263, Subpart A, as well as with the *Government Performance and Results Act of 1993 (GPRA)*, Section 4.

This data collection serves three purposes: First, data from three sources (grantees, project participants, and employers) are necessary to assess the performance of the IEPD program on its performance measures. Second, data from all three sources are necessary to determine if IEPD participants are fulfilling the terms of their service/cash payback requirements. Finally, budget and project-specific performance data are collected from IEPD grantees for project-monitoring and compliance information.

**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. First, the data collected fulfills performance reporting requirements. Grantees are required to report on their progress toward meeting the objectives and goals established for U.S. Department of Education grant programs. However, in addition to grantee data, IEPD needs data directly from participants and their employers for performance reporting.

Second, the data ensures participants complete a payback requirement that equals the number of months in training (for service payback) or the amount of training costs incurred (for cash payback). To fulfill service payback, participants must:

- a) Sign an agreement, at the time of selection for training, to meet the provisions of the payback requirement;
- b) Perform work related to the training received and that benefits Indian people; or
- c) Repay all or a prorated part of the assistance received.

The program office must receive information from the grantee that allows follow up with the participant. The program office also must receive information from the participant's employer with regard to placement, position, state licensure status for those teaching, and post-project employment duration. If the participant fails to complete the IEPD training or fails to complete the service payback requirement, the participant is required to pay back all or a portion of their training costs. Training costs are the total dollar amount the participant received in tuition, fees, books, childcare, or other expenses. Participants may defer their payback requirements if they are enrolled as full-time students in an approved education program at an accredited institution of higher education or if they are called to active-duty in connection with a war, military operation, or national emergency. For an education deferment, the participant must submit a written request for deferment to the program office that includes the name of the institution, a copy of the admission letter, the degree being sought, and projected date of completion. For a military deferment, the participant must submit a written statement from the commanding or personnel officer certifying that the participant is on active duty in the Armed Forces of the United States; the date on which the participant's service began; and the date on which the participant's service is expected to end; or a true certified copy of the participant's official military orders and a copy of the participant's military identification. After deferment has been granted, the participant must provide proof of ongoing full-time student status.

Third, the collected data (e.g., contact, budget and project-specific performance information from grantees) allows for project monitoring. As multi-year award recipients, IEPD grantees must provide the most current performance and financial expenditure information to ED as directed by the Secretary under 34 CFR 75.118 for continued funding.

### ***Data Collection***

To fulfill all of these purposes, the data collection involves grantee, participant, and employer representative components. The information is being collected on a mandatory basis from all grantees (the Grantee Reporting Form) and participants (the Participant Training Information and Employment Reporting Form) and on a voluntary basis from employers (the Employment Verification Form). Both grantees and participants complete, one time only, the Service Payback Agreement to ensure participants understand the IEPD service/cash payback requirements before accepting any grant funds. The Service Payback Agreement may be printed and the hard copy signed by all

parties, or the grantee and participant may complete the agreement electronically through the PDPDCS.

The PDPDCS collects data, on a semi-annual basis, directly from grantees, participants, and employers. The online system is easy to use and contains user training modules and system checks that will ensure data integrity. In addition, employment information provided by the participants is linked with data from the Common Core of Data (CCD) during analysis to capture employer demographics for performance reporting which will eliminate the need for employers to provide this information. Eligible employment for service payback is any employment that is in the participant's field of study and benefits Indian people (ESEA 7122, 34 CFR 263.8(b)). For participants receiving funding from grants awarded after fiscal year (FY) 2018, employment must be completed within a local education agency (LEA) or school that serves a high proportion of Indian students as compared to other LEAs in the State. The CCD is also used to determine the proportion of Indian students at the state and local levels.

### ***Grantee Data Collection***

In the grantee component, all IEPD grantees submit contact and training information for participants using the Grantee Reporting Form. For the first submission, grantees will provide information on participants enrolled in the project since the start of the grant and will upload a copy of each participant's payback agreement or complete the payback agreement digitally through the PDPDCS. Grantees will review and update information on participants and add entries and upload/complete digital payback agreements for new participants as needed. Changes in participant status (e.g., recruitment, leave of absence, military deployment, training completion, exiting without completion) must be entered in the PDPDCS within 7 business days of the change in status or by the end of the month in which the change occurred, whichever is later.

Grantees must also enter the cumulative total number of months the participant has been in the IEPD training program along with the cumulative total allowable training costs incurred at the end of each semester. Final totals must be entered when the participant leaves the program. Semester and final training information must be entered into the PDPDCS within 7 business days after the semester ends. This information will be visible to the participant so he/she can see their payback obligation amounts as they are incurred. Grantees will report this information on all participants for the length of the grant award.

### ***Participant Data Collection***

In the participant component, participants have access to the participant section of the system as soon as the grantee creates an account by entering in the participant's information into the system and uploading a payback agreement. Participants are encouraged via email to log into the PDPDCS at the end of each semester to review the

training and cost information reported by the grantee and to update their contact information if it has changed. This access benefits participants by allowing them to log into the system and see the total amount of funding received and the payback obligation as it is incurred. This access permits participants to make informed decisions regarding the amount of financial burden they want to assume while in the IEPD program. It also helps prevent participants from amassing large payback obligations without their knowledge.

IEPD participants are required to log into the online system within 1 month of exiting the IEPD program to complete a notice of intent to complete service or cash payback and update their system profile. Thereafter, participants must log in again every 6 months for the length of their service payback obligation period to report their employment and continuing education information using the Participant Training Information and Employment Reporting Form. All participants must report their employment status to IEPD as part of their service payback requirement. For service payback, eligible employment is any employment in the participant's field of study and that benefits Native people. IEPD contacts participants if they fail to report employment information every 6 months. Participants who select a cash payback or who fail to provide employment verification within the required timeframe are referred to the Department's Office of the Chief Financial Officer's Accounts Receivable and Banking Management Division (ARBMD) for cash repayment. Participants are also able to review and contest information entered about their funding and training entered by their grantees.

### ***Employer Data Collection***

In the employer component, employers are asked to review and verify the information entered by the participant documenting their service payback and licensure status. Through the Employment Verification Form, the employer review the employment information and either submit confirmation of its accuracy or provide revisions.

### **Uses of the data**

The IEPD program office staff use this database to report on the program's performance measures to ED's Budget Service. The aggregated performance data will also be included in ED's Annual Program Performance Report.

IEPD program office staff also use the database to determine whether participants fulfill their service payback requirements. If a participant does not fulfill his/her service payback requirement, the collected data helps IEPD staff determine the cash amount an individual must pay back. These are essential aspects of project oversight so that the program office can ensure that project participants are fulfilling requirements stipulated in program application materials.

- 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.**

All data are collected online and maintained on a secured server. The PDPDCS uses automated and electronic technology to reduce the cost and burden of information collection and eliminate the need to maintain paper files. Grantees, participants and employers receive emails and phone calls prompting them to log into the online system and report data. The data collection instruments and frequently asked questions are available online to respondents via <https://pdp.ed.gov/oie>.

- 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 will be no duplication of reporting efforts. The information requested for this reporting is not collected or reported elsewhere. Data to determine American Indian/Alaska Native enrollment in LEAs where participants are employed, which is necessary for compliance with the requirement that the work benefits Indian people, is not collected from any respondents and reduces respondent burden. This Indian enrollment data is gathered from ED's Common Core of Data by OIE's contractor.

- 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 forms were designed to solicit only the information necessary to respond to program and performance requirements. Thus, the burden of reporting is minimized to only those elements necessary to meet federal requirements for budget and program activity data.

**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.**

Participant follow-up is necessary for the Department to monitor service payback requirements. The only way that the Department can monitor completion of service requirements equal in value to that of the months in training is through systematic and ongoing follow up with participants and their employers (i.e., the principal or LEA representative).

**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.**

Grantees must report all changes in participant status (e.g., recruitment, leave of absence, military deployment, training completion, exiting without completion) by entering the information in the PDPDCS within 7 business days of the change in

status or by the end of the month in which the change occurred, whichever is later. Thus, if a grantee were to experience a special circumstance in which participant statuses changed more often than quarterly, the grantee would report more than quarterly. However, most training programs are divided into semesters, making this special circumstance unlikely.

- 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 15, 2024, a Federal Register Notice requesting public comment was published (Vol. 89, No. 135, page 57399). No comments were received during the 60-day comment period. The Department is publishing the applicable 30-day Federal Register notice to request public comment.

- 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 grantees 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.<sup>1</sup> 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 Department 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 the Department’s final regulations on the protection of human research participants. This compliance 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.

Project staff and contractors will adhere to the regulations and laws regarding the confidentiality of personally identifiable information (PII). In addition, the Department’s Office of the Chief Information Officer reviewed PDPDCS for compliance with the Federal Information Security Management Act, Office of Management and Budget Circulars, and the National Institute of Standards and Technology standards and guidance. On February 8, 2022 the system received an ongoing Authority to Operate.

Grantees and participants are provided the Privacy Act Notice which explains the need to collect the participant’s social security number (SSN) and other PII to ensure that recipients of scholarships provided with funds section 7122 of the Elementary and Secondary Education Act of 1965, as amended, meet specific statutory and regulatory requirements, including service obligation fulfillment or repayment of financial obligation. We request the participant’s information pertinent to the IEPD grant received whether provided by the participant, grantee, or other entity, including Social Security Number and other PII, under this authority in order to accurately track the participant’s records and to differentiate the participant’s financial obligation from other participants who may have the same name. The participant’s participation in the IEPD is voluntary, but they must provide the requested information, including the participant’s PII, in order to participate in the IEPD.

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<sup>1</sup> 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)

- 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.**

This information collection does not contain any questions of a sensitive nature such as those described above. Questions regarding SSN, employment information, and contact information are considered PII. However, this information is needed to track individuals who fail to keep in contact with the IEPD program office and are turned over to ARBMD. The ARBMD needs SSNs to try to locate participants in other databases including Internal Revenue Service databases.

- 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.**

Table A-1 presents the maximum annual burden estimates for grantees, participants, and employers. The Department estimates that 54 active grantees, 1,070 participants, and 1,070 employers will respond to this collection. Given that participants and employers are only required to respond once a participant has completed or exited a grant training program, it is possible that not all participants/employers in the counts above will respond in any given year; however, for the purposes of estimating burden, we present the maximum burden estimate by assuming that all of the estimated 1,070 participants will enter employment data twice per year, and all participants will be employed. The actual number of grantees, participants and employers may vary due to the availability of federal appropriations, number of grant awards made, and the number of participants recruited by each project.

The burden for grantees of completing the Grantee Reporting Form is estimated at 2 hours per participant per year; on average, each grantee has 20 participants. We expect most of the time to be used updating the cumulative total number of months of training the participants received and the cumulative total allowable training cost for participants. However, it should be noted the actual burden to the grantee will be much less because these costs are usually funded by the federal grant award as administrative wages.

The Service Payback Agreement is completed only once per participant per grant. These agreements are completed and signed at the time the participant enrolls in the grant-supported training. Grant project directors usually present information about their programs and explain the agreement during their program orientations. Therefore, project directors conduct these sessions in groups rather than individually and ensure participants are well informed about the nature of the agreement. We estimate that the review of the agreement and signatures should take 30 minutes. The PDPDCS offers an online version of the agreement that will prevent data entry errors and allow information from the Service Payback Agreement to be imported into the Grantee Reporting Form, reducing effort for the latter form.

Because the agreement is only completed prior to the start of training, grantees primarily conduct this activity in the first and second years of their grant. We estimate that 40 grants need to conduct this activity annually with an average of 10 participants per grant. Our estimate is based on roughly 20 grant awards being made in each fiscal year and an average of 20 total participants enrolled in each grant over the course of the first two years of the grant.

Each participant also completes the Service Payback Agreement and attends an information session with his/her project director to discuss, complete and sign the agreement. We estimate that these sessions will last roughly 30 minutes. These

agreements are completed when the participants begin their programs. We estimate that roughly 10 scholars in 40 grants will conduct this activity annually. Our estimate is based on 20 grant awards being made in each fiscal year and an average of 10 new participants enrolled in each grant over the course of the first two years of the grant.

For participants, biannual reporting begins within 1 month of completing or exiting project services when they select the type of payback they will complete. Across all projects, as many as 1,070 participants may be required to report their service status in a year. We anticipate that the participant reporting burden will be 20 minutes every 6 months.

For employers, the participant will initiate employment verification within 6 months of a participant's completion of project services. Some participants either do not stay employed or enter deferment due to approved full-time education. Therefore the number of employer representatives asked to provide verification may be lower than the number of participants that exited the IEPD training. We anticipate the employer representative burden to be 10 minutes per participant every 6 months.

**Table A-1. Estimated Annual Burden and Respondent Costs Table**

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	Number of Responses	Average Burden Hours per Response <sup>2</sup>	Total Annual Burden Hours <sup>3</sup>	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours) <sup>4</sup>
Grantees: Participant Record Form			54 grantees (20 participants per grantee)	20	2	2,160	\$50.00	\$108,000
Grantees: Service Payback Agreement (Once per participant/grant)			40 grantees (10 participants enrolled/yr)	10	0.50	200	\$50.00	\$10,000
Participants: Service Payback Agreement			400 participants	1	0.50	200	\$24.69	\$4,938

<sup>2</sup> All numbers are rounded to the nearest hundredth.

<sup>3</sup> All numbers are rounded to the nearest whole number.

<sup>4</sup> All numbers are rounded to the nearest whole number.

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	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)
(Once per grant)								
Participants: Participant Training and Employment Information Form (Twice/year)			1,070 participants	2	0.33	706	\$24.69	\$17,431
Employer representative s: Employment Verification Form (Twice/year)			1,070 <sup>5</sup> participants employed in schools	2	0.17	364	\$50.00	\$18,200
Annualized Totals			2,634			3,630		\$158,569

*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**

<sup>5</sup> Assumes all participants are employed.

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 start-up costs or annual operational costs associated with this application.

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 the Department 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
OIE Staff (salaries)	\$72,500
Contractor Data Services (Fixed price)	\$250,000
Total	\$322,500

The OIE has price contract with to create and secured a fixed AnLar and Westat manage the online

data collection system. To reduce costs for the federal government, OIE has worked collaboratively with two other Department offices, Office of Special Education Programs (OSEP) and the Rehabilitation Services Administration (RSA), to create the online system that all three program offices use to track service obligation payback. By combining resources, OIE is able to offer respondents a secure, online portal for entering data and a Help Desk to answer questions and resolve problems. The annual fixed costs for this contract average \$250,000. These costs include the development of the system, any temporary increase to go towards maintaining compliance with federal security requirements, support for respondents, and preparation of reports. The majority of communications with respondents will be electronic;

however, participants 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 IEPD program office maintains a .50 FTE staff person whose function is to manage the contract and tasks related to ensuring service payback compliance. The need for this staff person was identified in the OIG 2010 Audit. This staff position is a GS-14, which, in January 2022, ranges from \$126,233 to \$164,102 in annual salary for the Washington D.C. locality. The OIE staff salaries category also includes the estimated cost of program oversight by OIE management.

- 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).**

The adjustments are based upon changes in costs over time, as well as revised estimates regarding the number of grantees. This results in an adjustment increase in the number of responses of 308 responses and an increase in burden hours of 626 hours. The total number of burden and responses is 3,630 hours and 2,634 responses.

	<b>Program Change Due to New Statute</b>	<b>Program Change Due to Agency Discretion</b>	<b>Change Due to Adjustment in Agency Estimate</b>
<b>Total Burden</b>			626
<b>Total Responses</b>			308
<b>Total Costs (if applicable)</b>			

- 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 data will be used on an annual basis to report results to the Department’s Budget Service for performance reporting purposes and publication in ED’s Annual Program

Performance Report. A final report will be produced for each fiscal year. This report will include descriptive analyses of all variables collected and will monitor the fulfillment of participant service payback and grantee and participant compliance with the program regulations. The number of participants and percentages, as well as measures of central tendency when appropriate, will be presented by grant in table format. Charts will be prepared to illustrate changes in frequencies across FYs. Bulleted text and an executive summary will be provided to highlight key findings. All data will be in an aggregate form to protect PII and no PII information will be published.

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 (FY).

**Table A-3. Data Collection and Reporting Timeline**

Task	Month(s)
Respondents enter data	Ongoing
Snapshot taken of data	May
Draft reports for previous FY	June-July
GPRA reporting for previous FY	July-August
Final report for previous FY	August

- 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 OMB number and expiration date will be displayed on the data collection form.

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

There are no exceptions to the certification statement.