

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

Application to Participate in Federal Student Financial Aid Programs

- 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.**

This is a request for an OMB83 Change request to transfer/incorporate into the information collection 1845-0012, the Prison Education Program (PEP) application, 1845-0171. The PEP application is currently a separate application which is filed as an attachment to the electronic Application to Participate in Federal Student Financial Aid Programs. Due to the slight increase in burden associated with this requested merging of two separately approved information collections we are providing this updated supporting statement along with the standard Simple Change documents as requested.

No other change is being requested to the currently approved form.

Section 487(c) of the Higher Education Act (HEA) of 1965, as amended, requires that the Secretary of Education prescribe regulations to ensure that any funds postsecondary institutions receive under the HEA are used solely for the purposes specified in and in accordance with the provision of the applicable programs. The concept of this federal gatekeeping has a long history, originating in 1952. However, as a result of abuses by institutions in the Title IV programs, the HEA amendments of 1992 significantly increased ED's gatekeeping responsibilities. In general, the statutory provisions tightened the eligibility requirements for institutions participating in the student financial assistance programs authorized under Title IV of the HEA.

In 1994, the Secretary amended the regulations governing institutional eligibility under the HEA in accordance with the statutory requirements. The Institutional Eligibility regulations govern the initial and continuing eligibility of postsecondary educational institutions participating in the student financial assistance program authorized by Title IV of the HEA.

Part H, Subpart 3, Section 498 of the HEA of 1965, as amended, gives the Secretary the responsibility for determining qualifications of institutions of higher education to participate in programs under the HEA. To comply with this requirement Section 498(b) of the HEA specified that the Secretary prepare and prescribe a single application form. The Department developed the Application for Approval to Participate in the Federal Student Financial Aid Programs (the Application) to comply with the statutory requirements of collecting necessary information under the HEA.

An institution must use this Application to apply for approval to be determined to be eligible and if the institution wishes, to participate; to expand its eligibility; or to continue to participate in the Title IV programs. An institution must also use the Application to report certain required data as part of its recordkeeping requirements contained in the regulations under 34 C.F.R. Part 600 (Institutional Eligibility under the Higher Education Act of 1965, as amended).

The Department uses the information reported on the Application in its determination of whether an institution meets the statutory and regulatory requirements.

Listed below are the specific regulations that require an institution to submit an application to the Department of Education to:

- Request an eligibility determination and, if requested, certification to participate;
- Obtain approval for continued eligibility to participate;
- Request expansion of its current approval;
- Report updates to previously reported information, as required; and
- Request continued eligibility during and after a change in institutional ownership.

[Section 600.20](#) - **Application procedures** - requires an institution that wishes to participate in any Title IV program, to apply for initial eligibility, as well as continued or expanded approval including new locations or new programs.

[Section 600.21](#) – **Updating Application Information** - requires an institution to notify the Secretary of any changes to certain information, including its name, address, etc.

[Section 600.31](#) - **Change in ownership resulting in a change of control** - requires an institution that has undergone a change in ownership that results in a change in control to demonstrate to the Secretary that it meets the requirements of an eligible institution in order to continue to be eligible. The 1998 Amendments provided that the Secretary may continue the institution's participation on a provisional basis provided that the institution under the new ownership submits a materially complete application that is received by the Secretary no later than 10 business days after the change occurs.

Section 668.238 – **Application requirements** – this section of Subpart P which contains the Prison Education Programs (PEP) regulations that are required for a school to offer a PEP to confined or incarcerated individuals.

In addition to the information above, the application is also the place where schools can report other information that it needs or wants the Department to know.

After these questions are initially answered, they will pre-populate on subsequent applications and will only need to be answered again if the information changes.

The additional data collected incorporates information required to complete a thorough evaluation of the change while limiting the need for requesting additional follow-up 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.

The School Eligibility and Oversight Service Group, (the organization within the Department of Education, Federal Student Aid, responsible for providing integrated oversight to postsecondary schools) reviews and analyzes the information reported on the application and makes a determination on the institution's request. The School Participation Division's (SPD) decision to approve an institution's request for Title IV program eligibility only (in the case of an institution of higher education that does not plan to participate in our Title IV programs, however, it wishes for its students to be eligible for in-school deferments while in attendance), or Title IV eligibility and participation is based not only on the information reported by the institution on the application, but also on other information in the team's possession. SPD makes its decision using a case team approach to its work processes. This allows SPD to evaluate a school based on a total picture of integrated institutional information.

SPD's decision includes determining that the institution:

- Is designated an eligible institution;
- Is certified or recertified to participate in Title IV programs;
- Is approved, for Title IV purpose, to expand its current approval (new location or new programs, etc.);
- Met its reporting requirements and we have updated our records (changes to name or address, etc.);
- Is approved for continued certification during and/or after a change in institutional ownership; or
- Is denied eligibility, certification, or approval of its expansion for purposes of Title IV.

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 data submitted by an institution prior to this submission became part of the Postsecondary Education Participants System (PEPS), the Department of Education's computerized information management system of institutional data. Initially the data submitted on a paper Application was entered manually into PEPS, however an Electronic version of the Application has been in use since 1998.

This submission reflects the retirement of PEPS, and the implementation of the FSA Partner Connect information management system with an updated electronic version of the Application.

The Prison Education Program (PEP) form (OMB Control Number 1845-0171) was initially made available electronically and could be submitted as part of the supporting documentation required by the Electronic Application for Approval to Participate in the Federal Student Financial Aid Programs (E-App). To reduce burden, the initial form included electronic options for certification and allowed the school to enter information directly, save the form, and then submit the completed form along with the other supporting documentation that is required as part of the established E-App process. This request is to incorporate the form fully into the E-App by merging the PEP questions into the e-App. This will improve the PEP application process by minimizing the information input as the e-App will pre-populate the majority of the separate PEP application. The addition of the PEP application into the e-App will require all institutions to answer one additional yes/no question when entering information about a new program and requiring only nine PEP exclusive question to be completed.

An institution continues to access the Application at fsapartners.ed.gov. Many of the questions on the Application are pre-populated using information the institution submitted on its previous Application, which is stored in Partner Connect. Pre-populating answers to questions reduces burden for the institution by alleviating the need for the institution to enter a response to every question and allowing the institution to easily identify information that needs to be updated. (Note: Some questions about current operations must be answered each time an institution submits a complete application.)

When the institution has completed its updates to the Application, the updated application is submitted to the School Eligibility and Oversight Service Group. The institution receives immediate notification of receipt by the Department. After the Department makes its decision to approve or to deny the Application, the information from the Application is saved to Partner Connect electronically, thus reducing the Department's burden for data entry as well as increasing the accuracy of the data in Partner Connect and other Education systems that utilize the reported data.

The electronic application has additional features such as:

- Navigation links to allow the user to move from one section of the application to another;
- Smart logic that skips questions or sections that do not apply to the institution based on conditional responses provided to questions;

- Edits that help the institution not miss a required question or enter the wrong type of information;
- Help text to guide the user and provide additional information;
- ED contacts, both phone numbers and email addresses that create emails for the institution to submit its questions to the Department electronically; and
- A status page that allows the institution to monitor the status of the application in SPD's review process.

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.

With the merging of the PEP application into the e-App, the Department will be ending duplication that was previously required when the PEP was a stand alone application. Because the e-App pre-populates institutional information, such information no longer has to be input for submission, general program details only need to be provided once, and institutions only need to provide the updated PEP information.

Institutions are not required to maintain duplicate records. The Application for Approval to Participate in the Federal Student Financial Aid Programs provides the initial contact of an institution seeking to participate in Federal programs administered by Federal Student Aid. A new institution will not have provided similar information to any other office in the Department. While a continuing institution may have provided similar information as part of the Integrated Postsecondary Education Data System (IPEDS) survey, the Application information provided is not necessarily the same.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

The information collection does not impact small businesses or other small entities.

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.

Section 498(g) of the HEA requires that the Department recertify all eligible institutions that wish to continue to participate in the Title IV programs. The maximum time period the Secretary may approve an institution is up to 6 years.

The statute also provides that the Secretary may provisionally certify new institutions, institutions that change ownership, and institutions with demonstrated financial responsibility and/or administrative capability weaknesses for a period of time from one to three years. The Department uses provisional approval as a tool to allow for increased monitoring of institutions with no track record and institutions with documented problems. If information were collected less frequently for these institutions, ED would not be in compliance with the HEA and would not be using the tools Congress provided to improve gatekeeping capability.

Note that it is not necessary for an institution to submit a complete application to report activities such as change in name or address, a change in level of course offering, or a change in measurement of program length. Instead, with the Application, institutions need to update only the questions on the Application that are affected by the change. Thus, while the frequency with which institutions must report certain changes has not changed and cannot, because they are vital pieces of information relative to the institution's eligibility and the reporting of which is regulated, the reporting burden for those actions is decreased significantly.

If the collection is not conducted, a new institution would not be able to participate in Title IV programs, a currently approved institution would not be able to participate past its approved expiration date, meet the notification and recordkeeping requirements, or be able to expand its eligibility. Further, the Department would lose a valuable gatekeeping tool.

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.**

This collection of information does not meet any of the special circumstances described above.

- 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.

Because this request is to merge PEP (1845-0171) into the e-App (1845-0012) under the OMB83 Change request there is no requirement for public comment. Both of the approved information collections (1845-0012 and 1845-0171) have gone through periods of public comment prior to the approval by OMB.

The Application has been widely accepted by the community. The questions and format used as the basis for this submission has been in use since September 1996 based on feedback from a focus group of industry professionals (redesign group) regarding the

complexity, length, and burden of the previous version of the Application. The goals of improving the clarity, accuracy, and simplicity of the Application while still allowing the Department to improve gatekeeping, have a more efficient process, receive more reliable information from the institution, and provide for institutional accountability, produced a valuable tool that asks clear questions that do not burden institutions.

The Department holds a conference each Fall devoted to the effective and efficient administration of the Title IV, HEA programs. The Application is one of the processes that are featured at these conferences. Responses received from school officials continue to be extremely positive. In addition, Department officials routinely attend state, regional, and professional association meetings and conferences. Typically, the Department participates in these forums as an opportunity to receive feedback from the higher education community regarding its policies and procedures including the Application and the recertification process. The feedback continues to overwhelmingly approve the Application.

In addition to attending meetings and conferences, the Department also receives feedback from the community via telephone calls and e-mails. The Department has been responsive to these comments and suggestions from the community. This submission makes further improvements to the application by removing obsolete questions, clarifying questions on which we have observed confusion, and adding questions up-front that will reduce the need for follow-up with the institution during the review process.

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

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)

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 Application includes a Privacy Act Notice that (1) informs the institution of the statutory authority for the information collection, (2) explains that disclosure of the information is voluntary, but if the institution chooses not to submit an Application for Approval to Participate in Federal Student Financial Aid Programs, the institution cannot be determined to be eligible or continued to be eligible for the Title IV, HEA programs, and (3) identifies the third parties to whom the information may be disclosed.

System of Record Notice: Postsecondary Education Participants System 18-11-09 09/11/2018.

The PEP application does not include any PII.

- 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 collection does not ask questions of a sensitive nature.

- 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.**

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	0	0	0	0	0	0
For-Profit Institutions	1,969	2,737	3.2	8,864	\$38.73	\$343,303*
Private Institutions	1,546	1,852	4.0	7,418	\$34.23	\$253,918
Public Institutions	2,216	3,097	3.8	11,730	\$30.32	\$355,654
Annualized Totals	5,731	7,686		28,012		\$952,874

*This total is updated to correct the math provided in the earlier filing.

Supporting details for the Estimated Annual Burden follow:

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours
34 CFR Requirement 600.20 Initial Applications - Respondent Type				
Individual	0	0	0	0
For-Profit Institutions	70	70	17	1,190
Private Institutions	13	13	17	221
Public Institutions	3	3	17	51
Sub-total	86	86	17	1,462

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours
34 CFR Requirement				
600.20 Recertification Applications - Respondent Type				
Individual	0	0	0	0
For-Profit Institutions	488	488	10	4,880
Private Institutions	455	455	10	4,550
Public Institutions	477	477	10	4,770
Sub-total	1,420	1,420	10	14,200
600.20 Foreign Recert Applications - Respondent Type				
Individual	0	0	0	0
For-Profit Institutions	2	2	17	34
Private Institutions	29	29	17	493
Public Institutions	137	137	17	2,329
Sub-total	168	168	17	2,856
600.20 Expanded Eligibility Applications - Respondent Type				
Individual	0	0	0	0
For-Profit Institutions	330	647	1	647
Private Institutions	244	244	1	244
Public Institutions	596	1,168	1	1,168
Sub-total	1,170	2,059	1	2,059
600.21 Updating Eligibility Applications - Respondent Type				
Individual	0	0	0	0
For-Profit Institutions	1,026	1,477	1	1,477
Private Institutions	696	1,002	1	1,002
Public Institutions	703	1,012	1	1,012

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours
34 CFR Requirement				
Sub-total	2,425	3,491	1	3,491
600.31 Change in Ownership Applications - Respondent Type				
Individual	0	0	0	0
For-Profit Institutions	53	53	12	636
Private Institutions	9	9	12	108
Public Institutions	0	0	12	0
Sub-total	62	62	12	744
668.238 Application requirements - Subpart P Prison Education Programs				
Individual	0	0	0	0
For-Profit Institutions	0	0	0	0
Private Institutions	100	100	8	800
Public Institutions	300	300	8	2,400
Sub-total	400	400	8	3,200
Annualized Totals	5,731	7,686		
Total Unduplicated Respondents	4,983			
Total Hour Burden of Collection Information				

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.

600.20 Refers to applications submitted by institutions for initial approval, recertification, and expansion of its current eligibility. This requirement has been broken down into five lines since it takes a new school longer to complete an initial application than a participating school to complete a recertification application, and a foreign school longer to complete a recertification application than a domestic school. As explained earlier, the electronic application is pre-populated with information the Department previously received from the institution. Further, an institution applying for expansion of its current eligibility only needs to complete the portion of the application that applies to the expansion, so it takes much less time to complete that type of application.

600.21 Refers to the requirement that institutions must update the Department regarding certain required information such as changes to the institution's name or address.

600.31 Refers to applications submitted for change in ownership that result in the change of control.

668.238 Refers to applications submitted for additional programs being added to the institutional record under the Prison Education Program.

The previous estimates, excluding the PEP burden information was based on recent (FY 2012) conversations with institutions that have submitted applications for these various purposes, and updated to reflect additional time to respond to the additional questions for change in ownership and is unchanged.

- 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 is no cost burden to respondents or record-keepers resulting from the information collection other than that shown in items 12 and 14. The total government expense for capital and start up costs for this Information Collection is zero.

- 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.**

REVIEWERS COSTS: Identifies the amount of time for a reviewer to examine the information submitted on the application and the supporting documentation. This information is then reported out to the team for a full decision on the institution's application.

34 CFR Requirement	Number of Institutions Reporting Annually	Hours Required for ED Review	Total Hours	Average Hourly Wage	Cost per CFR Requirement
600.20 Initial Application	86	2	172	\$34	\$5,848
600.20 Recertification	1,420	2	2,840	\$34	\$96,560
600.20 Foreign Recert	168	3.5	588	\$34	\$19,992
600.20 Expand Eligibility	2,059	1	2,059	\$34	\$70,006
600.21 Update Eligibility	3,491	.5	1,745.5	\$34	\$59,347
600.31 Change in Ownership	62	4	248	\$34	\$8,432
ED Cost to review of the Application information					\$260,185

ED Cost to maintain system and improve electronic Application: \$450,000

Total Annualized Cost to the Federal government: \$710,185

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		+3,200	
Total Responses		+400	
Total Costs (if applicable)		0	

This update is for the 83C request to merge the PEP application into the e-App. The above illustrates the burden and response information that will merge from 1845-0171 into 1845-0012. We estimate 400 total institutions utilizing the PEP questions on the e-App, a decrease of 200 institutions from the 1845-0171 collection. We also are re-estimating an 8 burden hours per response for a total of 3,200 additional hours to the e-App. This represents a decrease of 2 hours per institution to file the PEP application from the 1845-0171 collection.

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.

Application information is not analyzed and no results are 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.

There are no exceptions to the certifications statement.

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 statement.