

**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. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

*This submission requests a Revision of a Currently Approved Collection. The current approval of the Application for Approval to Participate in the Federal Student Financial Aid Programs (the Application) expires in December 2025, and the Department of Education seeks a standard three-year extension past that date. In addition, this submission seeks approval for several minor revisions to the Application.*

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 when G.I. Bill funds were first required to be used at institutions accredited by recognized accrediting agencies. 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 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 CFR 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 and 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.

[Section 668.238](#) – **Application requirements** - contains the Prison Education Programs (PEP) regulations that are required for a school to offer a PEP to confined or incarcerated individuals.

This submission is for a *revision* of the information collection. The revisions to the Application appear in the following table:

**Summary of Changes**

<b>Change</b>	<b>Section</b>	<b>Description</b>	<b>Burden Change</b>
Add/remove/change application purposes	A	Adds/removes various application purposes and subpurposes; rewords existing application purposes.	<b>None</b>
Automatic approval for updates	A	Some simple update applications will be automatically accepted, saving time for analysts.	<b>None</b> ED to review fewer applications
New designation statuses	C	Adds four new Title IV designation statuses (question 2a).	<b>None</b>
Add fields for Registered Agent	C	Adds fields for <i>Job Title</i> and <i>Company Name</i> for Registered Agent (question 3i).	<b>Negligible</b> Two new fields entered and reviewed
Remove personal info fields	C	Removes fields for personal information for entity owner officials.	<b>Negligible</b> No longer entered/reviewed
Simple question updates	C	Corrects visibility for question 1; simple updates to question language in question 3e, 3h.	<b>None</b>
Remove personal information	D	Personal details (home address, personal email, personal phone) now only collected from the President/Chancellor and emergency contacts at domestic schools.  Adds yes/no question to determine whether an official is an emergency contact, then three checkboxes to determine which type of emergency official.	<b>Negligible</b> Most officials' personal information no longer entered/reviewed  Up to four checkboxes to click for emergency contacts

Fewer board entries for public schools; new explanatory text	D	Public institutions are only required to submit information for two specific positions: the President/Chairman and Secretary of the Board. Other schools should continue to report all members of the Board. Also adds various explanatory text on page (see questions 2 and 2a).	<b>Negligible</b> Slightly reduced data entry for public schools
Add question for website	F	Adds a new question for schools to enter the website for their additional locations.	<b>Negligible</b> Website entered and reviewed
Add explanatory text	F	Changes <i>Effective Date</i> field name to <i>First Instruction Date</i> . Adds explanatory text under <i>First Instruction Date</i> , <i>End Date</i> , <i>End Date Reason</i> fields.	<b>None</b>
New FSC logic	F	Changes logic for adding or deleting Federal School Codes, presenting different options depending on whether a school has an active FSC, an inactive FSC, or no FSC.  Presents clearly worded, situation-specific options rather than the vague single question currently on application.	<b>Negligible</b> Reduces some confusion
Adding Accreditation and Licensure questions	G	Adds two new questions (questions 3 and 4) and four sub-questions to capture necessary information about accreditation and licensure requirements.	<b>Negligible</b> Up to six new fields filled and reviewed
Adding “Program End Date Reason”	G	Adds a picklist for schools to select the reason a program is ending when they enter an end date. If the school picks the reason “Other”, a blank text box appears for them to enter details.	<b>Negligible</b> One picklist added
Clarifying question text	H	Clarifies text of one question (question 2).	<b>None</b>
Add field for Business Entity	K	The Application currently asks for the name of the Ability to Benefit test administrator, but not the name of their business. This change adds a	<b>Negligible</b> One field filled and

name		field for “Business Name”.	reviewed
Add question for high school completion policy	L	Adds this question: “Has your institution developed procedures to evaluate the validity of a student’s high school completion when you have reason to believe that the high school diploma is not valid or was not obtained from an entity that provides secondary school education?” (Yes/No; optional field for explanation)	<b>Negligible</b> One box ticked and reviewed; one field optionally filled and reviewed
New process for selecting Title IV programs – Initial apps	M	Simplifies initial applications by switching from asking schools to select the Title IV programs they want to participate in to only asking whether they want to participate. FSA will then determine which programs a school is eligible for.	<b>Negligible</b> One box ticked rather than several
New process for selecting Title IV programs – Other apps	M	Creates new logic for adding or dropping participation in Title IV programs for applications that are not initial applications. Presents separate screens to add programs and to drop programs.	<b>None</b>
Consolidate Direct Loan questions	M	Removes separate question for William D. Ford Federal Direct Loan Program (Direct Loan Program).	<b>None</b>
Clarify language	N	Clarifies language asking for additional contact details.	<b>None</b>
Remove autopopulation	N	Additional contacts must now be entered with each application, rather than being carried over from previous applications.	<b>Negligible</b> Infrequently used table now manually entered
Emergency Contacts table	N	Adds <i>Emergency Contacts</i> table in Section N, autopopulated with officials’ personal information entered in Section D (for domestic schools). Foreign schools edit this table manually.	<b>None</b> All data currently entered elsewhere on application

New certifications for PEP/GE	Q	If a school has Gainful Employment (GE) programs or Prison Education Programs (PEP), new certification text is displayed. (see <i>Application Questions</i> document for added text)	<b>Negligible</b> Two boxes ticked and reviewed
Minor changes re: signature authority	Q	Slightly rewords question about signature authority for increased precision of language.	<b>None</b>
Minor changes re: signature authority	Q	Modifies the logic for selecting signature authority. Schools are currently asked whether their signature authority is their CEO, President/Chancellor, or COO (checkbox), and if not, are allowed to enter contact information for a different individual. After these changes, schools will only be able to select the CEO or President/Chancellor they entered earlier on the Application (picklist).	<b>None</b>
Remove personal information collection	Q	No longer asks for personal details (home address, personal email, personal phone) in this section.	<b>Negligible</b> Information for one contact not entered
Add self-certification for Title IV policies and procedures	Q	Allows schools to self-certify policies and procedures via new certification text. (see <i>Application Questions</i> document for added text)	<b>Reduced Burden</b> Policies and procedures no longer uploaded or reviewed
Add self-certification for debarment checks	Q	Allows schools to self-certify that their employees and contractors are not prohibited from participating in the administration of Title IV programs due to criminal activity, unaddressed financial liability, loss of Federal funds, etc.	<b>Increased Burden</b> Debarment checks shifted from ED staff to school staff.

**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 Branch (SEOSB; 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 decision that SEOSB makes 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 but 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. SEOSB makes its decision using a case team approach to its work processes, allowing for evaluation of a school based on a total picture of integrated institutional information.

The decision made by SEOSB 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 other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The Department of Education has collected and stored institutional data in Partner Connect, a computerized information management system, since 2022. Partner Connect serves as an upgraded replacement for the previous Postsecondary Education Participants System (PEPS), which had been in service as a public data collection tool since 1998.

An institution continues to access the Application at [fsapartners.ed.gov](https://fsapartners.ed.gov). Many of the questions on the Application are pre-populated using information the institution submitted on its previous Applications, which are stored in Partner Connect. Pre-populating answers to questions reduces burden 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 Branch. 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:

- Smart logic that skips questions or sections that do not apply to the institution based on conditional responses provided to questions;
- Alerts 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 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.**

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 (FSA). A new institution will not have provided similar information to any other office in the Department.

While a continuing institution may have provided some similar information as part of the Integrated Postsecondary Education Data System (IPEDS) survey, schools are statutorily required to report changes and new information within 10 days (per 34 CFR 600.21), so the data annually reported to IPEDS cannot be relied upon for establishing Title IV eligibility.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

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 six 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.

If the collection is not conducted, a new institution would not be able to participate in Title IV programs, and 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. Consequently, student aid recipients would not be able to access the funding that allows them to pursue their education.

Furthermore, the Department would lose a valuable gatekeeping tool if the collection were not conducted, as the regular review of institutional eligibility data alerts the Department to signs that unscrupulous institutions may be attempting to abuse Title IV funding, possibly through institutions changing ownership or otherwise trying to evade eligibility requirements.

**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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, 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 August 8, 2025, a 60-Day Federal Register Notice was published at 90 FR 41387 seeking public comment on this collection. We received 11 comments and appreciate the thoughtful suggestions regarding the E-App and related systems. All feedback has been carefully considered. While no changes have been made to the previously submitted E-App updates, we have:

- Forwarded select comments to the appropriate agency divisions for further review.
- Logged other suggestions for evaluation in future E-App versions.
- Addressed concerns and explained our rationale in the attached comment responses.
- Incorporated clarifying language on certain issues into the upcoming *User Reference Guide to the E-App*, which will be released shortly after the next E-App update.

This is the request for the 30-Day Federal Register Notice.

The Application has been widely accepted by the community. The questions and format used as the basis for this submission have been in use since September 1996 and reflect 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 programs. The Application is featured at these conferences, and 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 emails. 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 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 the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

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 programs, and (3) identifies the third parties to whom the information may be disclosed.

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**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.**

The annual burden for schools is reported below, divided by institution type due to the significant differences in the complexity of the Application depending on the type of institution applying. The figures presented are averages based on 2017 – 2024 application numbers. Hour burden changes are minimal since the last approved collection, as explained in detail under Question 15.

Hour burden information was initially estimated based on FY 2012 conversations with institutions that had submitted applications and has been updated to reflect the minor changes listed in the *Summary of Changes* section of this document.

**Table 1: Estimated Annual Burden and Respondent Costs**

<b>Institution Type</b>	<b>Respondents</b>	<b>Responses</b>	<b>Burden Hours / Response</b>	<b>Annual Burden Hours</b>	<b>Average Hourly Wage</b>	<b>Total Annual Costs</b>
Public	1329	1511	3.9	5,892	\$54	\$318,164
Non-Profit	1303	1465	4.1	6,008	\$59	\$354,444
Proprietary	1094	1272	3.3	4,197	\$67	\$281,212
<i>Total</i>	<i>3726</i>	<i>4248</i>		<i>16,097</i>		<i>\$953,819</i>

**Table 2: Supporting details - Estimated Responses by Application Type**

Institution Type	Change in Ownership	Designated Eligible	Initial	Merger	Recertification	Reinstate	Update
Public	1	1	3	4	377	3	1121
Non-Profit	9	6	22	3	427	4	994
Proprietary	75	1	45	2	395	4	750
<i>Total</i>	<i>85</i>	<i>9</i>	<i>69</i>	<i>9</i>	<i>1200</i>	<i>11</i>	<i>2865</i>

*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 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 startup 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.**

The following table identifies the costs associated with reviewing Applications and maintaining Partner Connect, the electronic system that stores Application data.

**Table 3: Annualized Cost to the Federal Government**

<b>Application Type</b>	<b>Responses</b>	<b>Review Hours</b>	<b>Total Hours</b>	<b>Average Hourly Wage</b>	<b>Cost per Application Type</b>
Merger / Change in Ownership	94	4	377	\$44	\$16,566
Initial / Designated as Eligible	78	1	78	\$44	\$3,432
Recertification / Reinstatement	1210	1	1,210	\$44	\$53,257
Update	2579 <sup>1</sup>	0.4	1,032	\$44	\$45,388
<b>Cost to review Application information:</b>					\$118,642
<b>Cost to maintain system and improve electronic Application:</b>					\$11,800,000
<b>Total Annualized Cost to the Federal government:</b>					\$11,918,642

**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).**

<sup>1</sup> Approximately 10% of these update applications will now be automatically reviewed (see Question 15). The cost and hours figures for this line reflect that savings.

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

The Application is only receiving minor updates since its previous Paperwork Reduction Act submission, the majority of which entail negligible changes in data entry burden for schools. The effects of several minor but non-negligible changes are itemized below.

**Table 4: Cost Changes Affecting Schools**

	Previous	Updated	Change	Explanation
<b>Hourly Wages</b>	\$34	\$59	+\$25	<b>Estimation change:</b> Raised in line with 2025 BLS figures. Revised hourly wage estimates by institution type are as follows, based on previously determined proportions: <ul style="list-style-type: none"> <li>Public institutions: \$54</li> <li>Non-Profit institutions: \$59</li> <li>Proprietary institutions : \$67</li> </ul>
<b>Annual Applications</b>	7,286	4,248	- 3,038	<b>Estimation change:</b> Reduced based on 2017-2024 averages of applications received.
<b>Hour Burden</b>				<b>Program Change, Agency Discretion:</b> The following changes to the Application affect the burden on schools: <ul style="list-style-type: none"> <li><i>Self-certification for debarment checks:</i> Shifting responsibility for debarment checks from the Department to schools will increase hour burden for school administrators working on Initial applications and certain Update applications.</li> </ul>
Merger / Change in Ownership	12	12	0	
Initial / Designated as Eligible	17	17.5	+ .5	
Recertification / Reinstatement	10	10	0	
Update	1	1.1	+ .1	
<b>Cost Totals</b>	\$852,741	\$953,819	+\$101,078	Increases in hourly wages and minor increase in hour burden leads to increased overall costs, despite reduction in estimated number of applications.



**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.