

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 Office of Postsecondary Education (OPE), in the Department of Education (the Department) is seeking an extension to the Office of Management and Budget (OMB) control number for the Accrediting Agencies Reporting Activities for Institutions and Programs - Database of Accredited Postsecondary Institutions and Programs (DAPIP).

The Secretary of Education is authorized by 34 CFR§ 602 to recognize accrediting agencies to ensure that recognized accrediting agencies are, for the purposes of the Higher Education Act of 1965, as amended (HEA), or for other Federal purposes, reliable authorities regarding the quality of education or training offered by the institutions or programs they accredit. Federal regulations (34 CFR§§ 602.26 and 602.27, 602.28) outline information that accrediting agencies must report to the Department of Education (Department) on a timely basis in order to support the Department's oversight role, including information on accreditation actions taken with regard to institutions and programs.

20 U.S.C. 1099b Criteria Required:

No accrediting agency or association may be determined by the Secretary to be a reliable authority as to the quality of education or training offered for the purposes of this chapter and part C of subchapter I of chapter 34 of title 42 or for other Federal purposes, unless the agency or association meets criteria established by the Secretary pursuant to this section. The Secretary shall, after notice and opportunity for a hearing, establish criteria for such determinations. Such criteria shall include an appropriate measure or measures of student achievement. Such criteria shall require that—  
(excerpted sections 7 & 8)

(7) such agency or association shall notify the Secretary and the appropriate State licensing or authorizing agency within 30 days of the accreditation of an institution or any final denial, withdrawal, suspension, or termination of accreditation or placement on probation of an institution, together with any other adverse action taken with respect to an institution; and

(8) such agency or association shall make available to the public, upon request, and to the Secretary, and the State licensing or authorizing agency a summary of any review resulting in a final accrediting decision involving denial, termination, or suspension of accreditation, together with the comments of the affected institution.

The implementing regulations in 34 CFR §§ 602.26 and 602.27, more specifically identify the reporting requirements for recognized accrediting agencies. 34 CFR § 602 is available at: <https://ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-602/subpart-B>

**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 information that accrediting agencies are required to submit to the Department allows it to take action on deficiencies, and to notify the Secretary of systemic non-compliance by accredited institutions with regard to the agency's policies. The information collect is vital to ensure the Department is aware of situations at institutions that could impact the administration of federal student aid and help identify situations that could lead to school closures and aid in mitigating the impact on students.

The Department also uses data collected to evaluate compliance with 34 CFR § 602 for accrediting agencies. The evaluation of an accrediting agency's compliance with 34 CFR § 602 occurs at any time during the five-year recognition period or during the renewal of an accrediting agency's recognition.

The information is relied upon by Federal Student Aid, state agencies, other accrediting agencies as well as students, families, employer, and taxpayers.

**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.**

Notifications of accreditation actions required by 34 CFR §§ 602.26 and 602.27 are submitted to the Department by accrediting agencies via the Database of Accredited Postsecondary Institution and Programs (DAPIP), which is a web-based system.

Reporting required by 34 CFR § 602.28 is submitted via email to the aslrecordsmanager email inbox and not via the DAPIP. It should be noted that reporting required by 602.28 is infrequent, and the situations that require reporting pursuant to 602.28 are infrequent.

Reporting via DAPIP is the subject of this revision. In addition, the DAPIP system allows accrediting agencies to provide information in a system that multiple offices within the Department accesses, which reduces the overall burden.

**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.**

This information collection does not duplicate any other information collection effort in the Department. No other agencies or organizations systematically report accrediting actions related to accreditation in the same broad manner for the Department. The information is not available in other forms or as the result of other information collections.

**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.**

This is an extension of an expiring/ previously approved collection of information required to be reporting to the Department by recognized accrediting agencies pursuant to statute and regulations. Small businesses or other small entities are not part of the target population of the information collection.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

By failing to collect the information or by collecting the information less frequently, the Secretary will be unable to obtain the information needed to determine compliance with 34 CFR Part 602, to ensure that the accrediting organization is a reliable authority regarding the quality of education offered at the institutions they accredit. Ultimately, failure to collect this information would be catastrophic and jeopardize students' ability to receive Title IV Federal Student Aid and participate in non-HEA Federal programs. The information is relied upon by Federal Student Aid, state agencies, other accrediting agencies as well as students, families, employer, and taxpayers.

**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.**

There are no special circumstances that would require this information collection to be conducted.

**8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.**

**Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and**

**that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.**

**For the 30 day notice, indicate that a notice will be published.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The Department will publish the applicable 60-day notice in the Federal Register inviting public comment on the data collection and the burden assessment.

The Department will publish the applicable 30-day notice in the Federal Register for additional public comments, with public comments considered in finalizing the information collection.

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

No payments will be made 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.<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**

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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)

**ensure that your response per respondent matches the estimate provided in number 12.**

Accreditation is a matter of public record in all states and jurisdictions. Therefore, the information requested from accreditation agencies is required, not voluntary and is considered public information. No PII is collected, and the Department makes no pledge about the confidentiality of the data.

- 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.**

Neither the data collection nor the information items in the adverse action reports include questions of 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.**

**Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.**

Data collection and burden for this collection are related to requirements from 34 CFR§ 602. This burden is primarily due to accreditation agencies being required to report information about institutions to the Department. The number of accrediting agencies (not-for-profit associations) required to respond to the information collection is 52. This is one less accrediting agencies than as noted in the expiring collection. The number of responses (7499) was determined by counting the actual number of entries/inputs (accrediting actions) made by accrediting agencies into the DAPIP system over a one-year period. The Department in the previous expiring burden determined that it takes, on average, approximately five minutes per entry to enter accrediting agency actions into to the DAPIP system.

$7,499 / 52 = 144.2$  responses per respondent  
 $5 \text{ (minutes)} / 60 \text{ (minutes)} = 0.0833$  hour per response  
 $0.0833 * 7498.92 = 624.6$  (total annual burden hours)  
 $\$3.94 * 7,498.92 = \$29,545.74$

**Estimated Annual Burden and Respondent Costs Table**

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Response per Respondant	Average Burden Hours per Response	Cost per response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
DAPIP	52	7,499	144.21	0.0833	\$3.94	624.6	\$47.28	\$29,545.74
Annualized Totals	52	7,499	144.21	0.0833	3.94	624.6	\$47.28	\$29,545.74

*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 : 0  
 Total Annual Costs (O&M) : \_\_\_\_\_  
 Total Annualized Costs Requested :

There is no startup cost

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.

Annualized Federal Burden	
System Contract Cost	\$387,300

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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.**

For this collection, the Department is using wage information form the Bureau of Labor Statistics, Education Administrators, Other category (11-9039). The average hourly earnings is \$47.82 per hour (as of May 2024).

There is also a change in the number of reported actions (responses). Changes in the number of actions is expected since an accredited institution’s status can change frequently which also affects the number of actions reported by accrediting agencies. The number of report actions for the extension is 7,499. The information reported in DAPIP are accreditation actions, meaning the accrediting agency places an institution on probation, terminates accreditation, grants initial accreditation to institutions. Each time that happens that information is reported in DAPIP (responses). The accreditation status will change, and the number of actions will always change. That number will not be consistent from year to year.

	<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>			-127
<b>Total Responses</b>			-1,515
<b>Total Costs (if applicable)</b>			-3,152

- 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 Department makes information it collects from accrediting agencies available on DAPIP at <https://ope.ed.gov/dapip/#/home> . No additional tabulation or modifications are applied. No complex analytical techniques are used in this process.

- 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 Office of Postsecondary Education is not seeking this approval.

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

There are no exceptions to the statement.