

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Earnings Accountability Reporting, Disclosures, and Warnings.**

- 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.**

Section 84001 of the One Big Beautiful Bill Act (OBBB), signed into law by President Trump on July 4, 2025, established an accountability framework for all postsecondary programs of study that participate in the Direct Loan Program, modifying the Higher Education Act of 1965, as amended (HEA). The proposed framework would compare the median earnings of graduates to median earnings of a comparison group and would discontinue a program's Direct Loan eligibility if its graduates earn less than the comparison group.

On January 5, 2026, the Department of Education (the Department) convened a negotiated rulemaking committee to consider the new institutional accountability framework to develop regulations that improve institutional accountability by increasing transparency on program costs, aid, and outcomes.

In the proposed rule, the Department seeks to promote consistency across institutions and programs by harmonizing the existing FVT/GE framework with the earnings accountability framework established by the OBBB. As part of that harmonization and to reduce burden on institutions, we intend to merge the following existing approved information collections:

- 1845-0184 Financial Value Transparency and Gainful Employment Reporting Requirements
- 1845-0174 Student Disclosure Acknowledgements
- 1845-0173 Gainful Employment Student Warnings and Acknowledgments

The Department requests to retain the 1845-0184 OMB Control number and requests to amend the title of the collection to: Earnings Accountability Reporting, Disclosures, and Warnings. The Department is requesting that 1845-0173 and 1845-0174 be merged with 1845-0184. We would request OMB control numbers 1845-0174 and 1845-0173 be discontinued.

This is a request for a revision of the currently approved collection 1845-0184 Financial Value Transparency and Gainful Employment Reporting Requirements. This revision includes renaming the collection to *1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings*. Revisions to this collection will allow the Department to obtain the required information to implement the accountability framework as outlined in OBBB.

- 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 Department will use information from this collection to determine if a GE or eligible non-GE program is eligible for participation in the Direct Loan Program and whether the institution demonstrates administrative capability to administer the Title IV, HEA programs.

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.**

This collection will be accomplished by using existing FSA data collection systems including the National Student Loan Data System (NSLDS) and any successor systems. The burden is minimized by using existing systems that postsecondary institution staff are already familiar with to report the required information to FSA.

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.**

The Department does not require institutions to report items that are already available through other required institutional reporting requirements to avoid duplication. There is no similar information available that can be used or modified for this purpose at this time.

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 Department does not believe the regulations will adversely impact any institution that may meet the small entity designation.

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.**

Without this collection, the Department would lack key information necessary to fulfill the Department's policy objectives in calculating and disclosing to the public key information about eligible postsecondary programs, including information about net program costs.

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.

The Department amends § 668.603 Low-earning outcome programs which provide that an institution may appeal *within 30 days* the Secretary's determination that a program is a low-earning outcome program through a process described by the Secretary separate from the limitation and termination proceedings under Part 668 Subpart G.

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 developed these proposed regulations after conducting negotiated rulemaking with affected entities and other parties. On April 20, 2026, the Department published a Notice of

Proposed Rulemaking (NPRM) in the Federal Register (91 FR 21088). The NPRM opened a 30-day comment period inviting the public to comment on the proposed burden.

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 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.

There is a need to gather personally identifiable information (PII) for those students who are required to be reported for these calculations. The Department will provide the institutions with listings of completers from NSLDS to gather information for processing the earnings premium calculations. This will be done through files provided through the institutions' SAIG mailboxes. The use of PII is covered under the NSLDS SORN published June 28, 2023 (88 FR 41934) and any future updates. Appropriate safeguards will be observed to ensure that individual information is protected. Only aggregated information is shared with the public.

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.

There are no questions of a sensitive nature in this collection.

12. Provide estimates of the hour burden for this current information collection request. The statement should:

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)

- 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.

§ 668.401 Student tuition and transparency system scope and purpose

Summary

Proposed regulations would require institutions to remove references to the debt-to-earnings metric and update, where necessary, the earnings premium metric.

Burden

Institutions would be required to review the revised earnings premium measure (10 hours), remove any references debt-to-earnings metric, and add the revised earnings premium measure to policies, procedures, systems, operations (160 hours), and train staff (60 hours).

230 hours x 5,626 institutions = 1,293,980 burden hours

Entity	Respondents	Hours	Burden Hours
Public	1,869	230	429,870
Private	1,674	230	385,020
For Profit	2,083	230	479,090
Total	5,626		1,293,980

§ 668.402 Student tuition and transparency system framework

Summary

Section 668.402 proposes to amend the current FVT/GE framework. The Department proposes removing the D/E rate metric and using only using an earnings premium measure.

Burden

Proposed § 668.402 would decrease burden on institutions. The new approach would use significantly less data reported by institutions and instead rely on administrative enrollment data that institutions have become accustomed to reporting. Currently, there are 5,104,110 burden hours assigned to 1845-0184. With the new framework, institutions will still have recordkeeping and reporting requirements, however, the Department estimates the proposed rule will eliminate 30% of the currently assessed reporting burden. This results in a decrease of 1,531,233 burden hours.

30% of 5,104,110 = 1,531,233

Entity	Respondents	Hours	Burden Hours
Public	1,869	-272	-508,688
Private	1,674	-272	-455,648
For Profit	2,083	-272	-566,897
Total	5,626		-1,531,233

§ 668.404 Process for obtaining data and calculating earnings premium measure

Summary

Section 668.404 of the proposed regulations explains the processes for the Secretary to obtain data to calculate an earnings premium measure. The Secretary will send institutions lists of completers based on the requirements in this proposed regulation. An institution would have 60 days from receiving the lists to correct any information on the lists.

Burden

This would create burden on institutions. Proposed § 668.404 would allow an institution to review information by the Secretary and correct the information, if necessary, within 60 days of receiving the list. While this regulation is permissive rather than instructive, the Department believes that 80% of institutions would still take time to review the information on the list provided by the Department. If it takes an average of 3 hours to review the information, this adds 13,503 burden hours to 1845-0022.

Note that although this is not a new requirement, it was not reflected in the Paperwork Reduction Act analysis for the FVT/GE regulations in which this requirement originated. Therefore, the Department is calculating burden for this requirement in these proposed regulations.

80% of 5,626 = 4,501 institutions

4,501 institutions x 3 hours= 13,503 burden hours

Entity	Respondents	Hours	Burden Hours
Public	1,495	3	4,485
Private	1,340	3	4,020
For Profit	1,666	3	4,998
Total	4,501		13,503

§ 668.405 Determination of the earnings premium measure

Summary

Section 668.405 describes the notice of determination that the Secretary sends to institutions each year with information on the outcomes of their programs.

Burden

The Department estimates it will take an institution 2 hours to review the notice of determination. This adds 11,252 additional burden hours.

5,626 institutions x 2 hours = 11,252 burden hours.

Entity	Respondents	Hours	Burden Hours
Public	1,869	2	3,738
Private	1,674	2	3,348
For Profit	2,083	2	4,166
Total	5,626		11,252

§ 668.406 Reporting requirements

Summary

Section 668.406 proposes reporting requirements for these regulations.

Burden

As stated in earlier sections of this Notice, the Department estimates that with the proposed regulations there could be a 30% decrease in burden on institutions for reporting. In 2023, we estimated that the annual burden hours for all institutions for reporting would be 1,459,603 hours. The Department believes there will be a 30% reduction in burden and will remove 437,801 hours from 1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings.

Further description of the details of reporting can be found in the attached document titled Reporting Data Elements_1845-0184.

30% of 1,459,603 = 437,801 less burden hours

Entity	Respondents	Hours (rounded)	Burden Hours (rounded)
Public	1,869	-77.82	-145,445
Private	1,674	-77.82	-130,270
For Profit	2,083	-77.82	-162,099
Total	5,626		-437,801

§ 668.601 Earnings accountability scope and purpose

Summary

Section 668.601 proposes to apply the earnings accountability program eligibility consequences to both GE programs and eligible non-GE programs. Previously the program-level eligibility consequences only applied to GE programs.

Burden

Consequences of failing the earnings premium metric would apply to nearly all Title IV programs. This would require an institution to review the new regulations and new metrics (8 hours), update relevant systems (100 hours), update policies and procedures and train staff (100 hours). This would add 208 burden hours to institutions.

208 hours x 5,626 institutions = 1,170,208 total burden hours

Entity	Respondents	Hours	Burden Hours
Public	1,869	208	388,752
Private	1,674	208	348,192
For Profit	2,083	208	433,264
Total	5,626		1,170,208

668.603 Low-Earning Outcome Programs

Summary

Under the regulations, a program that has failed the earnings premium measure metric, as long as it is not yet a low-earning outcome program, could conduct a voluntary orderly program closure. This would require the institution to meet certain program discontinuation requirements. A voluntary orderly program closure would allow the program to retain Direct Loan eligibility for no more than 3 years while currently enrolled students completed their program.

Burden

In the preamble to the Notice of Proposed Rulemaking (NPRM), the Department had originally estimated there would be 6,520 programs that failed the earnings premium the first year the calculation becomes effective. As described earlier in the Regulatory Impact Analysis, the Department now estimates that approximately 3,302 programs could fail the earnings premium measure the first year the calculation becomes effective. Of the 3,302 programs, the Department predicts that 40 percent, or 1,321, will choose to complete a voluntary orderly program closure. Based on comparable situations, we anticipate it would take an institution 40 hours of preparation for an orderly program closure, which would include informing students and providing options and agreeing to amend their PPA. We estimate an additional 6 hours for reporting this information to the to the State, accrediting agency, and the Department. Because of the decrease in the estimated number of program failures, the burden for this regulation has been reduced from 2,608 responses and 119,968 burden hours to 1,321 responses and 60,766 burden hours.

1,321 orderly program closures × 46 hours = 60,766 Burden hours

§ 668.605 Student Warnings**Summary**

In the proposed regulations, student warning requirements would be extended to eligible non-GE programs for both enrolled and prospective students. The proposed regulations would also expand the content of the warnings to explain Pell lifetime eligibility used. Institutions would be required to send this warning when the Secretary notifies them that the program may become ineligible for the Direct Loan program. Additionally, the institution would be required to provide a Pell LEU warning each time Pell is disbursed. The Department proposes to amend the description of academic and financial options from the current requirements of the student warnings.

Burden

The Department estimates 831,000 students will need to receive such warnings. We believe it would take 5 hours to create this warning and an additional 1 hour per 100,000 students for review and transmission of the warnings, totaling 14 burden hours.

Institutions would also need to send the same group of recipients the Pell LEU warning notification for each subsequent Pell disbursement. The Department believes it would take institutions 8 hours to create and implement this requirement. We estimate that subsequent warnings would take 1 hour per 100,000 students, adding 8.3 hours of burden. Pell disbursements may happen more than once during one award year. For this reason, we estimate 2 warnings per student per award year. This totals 16.6 hours of burden.
5,626 institutions X 16.6 hours = 93,392 annual burden hours.

Entity	Respondents	Hours	Burden Hours
Public	1,869	16.6	31,025.4
Private	1,674	16.6	27,788.4
For Profit	2,083	16.6	34,579
Total	5,626		93,392

Regulations found in this Supporting Statement are those that contain burden and are found in proposed Subpart Q: Student Tuition and Transparency System and Subpart S: Earnings Accountability. The Department seeks to promote consistency across institutions and programs by harmonizing the existing FVT/GE framework with the earnings accountability framework established by the OBBB.

As part of that harmonization and to reduce burden on institutions, we intend to merge the following existing approved information collections:

OMB Control #	Responses	Burden Hours
1845-0184 Financial Value Transparency and Gainful Employment Reporting Requirements	284,575	2,300,810
1845-0174 Student Disclosure Acknowledgements	88,779	15,739
1845-0173 Gainful Employment Student Warnings and Acknowledgments	130,669	22,924
Total	504,023	2,339,473

Under the proposed regulations, it would no longer make sense for the Department to separate 1845-0174 and 1845-0173 into two different collections outside of 1845-0184. The Department requests to retain the 1845-0184 OMB Control number and amend the title of the collection to: Earnings Accountability Reporting, Disclosures, and Warnings. The Department also requests that OMB discontinue 1845-0174 and 1845-0173 because the requirements and burden associated with those collections would be absorbed into 1845-0184.

Regulation	OMB Control #	Burden Hours	# of	Total Burden	Costs
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			Responses	Hours	
§ 668.401 Student tuition and transparency system scope and purpose	1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings	230 hours	5,626	1,293,980	\$129,346,240
§ 668.402 Student tuition and transparency system framework	1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings	272 hours	5,626	-1,531,233	-\$153,062,050
§ 668.404 Process for obtaining data and calculating earnings premium measure Summary	1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings	3 hours	4,501	13,503	\$1,349,759
§ 668.405 Determination of the earnings premium measure	1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings	2 hours	5,626	11,252	\$1,124,750
§ 668.406 Reporting requirements	1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings	-77.82 hours	5,626	-437,801	-\$43,762,588
§ 668.601 Earnings accountability scope and purpose	1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings	208	5,626	1,170,208	\$116,973,991
668.603 Low-earning outcome programs	1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings	46 hours	1,321	60,766	\$6,074,169
§ 668.605 Student Warnings	1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings	16.6 hours	5,626	93,392	\$9,335,464
Total		699.78 hours	39,578 responses	674,054 burden hours	\$67,378,438

Total burden for 1845-0184 is broken down in the table below. To estimate total costs, we used the median hourly wage for [Education Administrators, Postsecondary](#) (11-9033) from the U.S. Bureau of Labor Statistics. In 2024 this was \$49.98. To account for overhead costs and benefits, the Department has multiplied by this wage by two, resulting in hourly costs of \$99.96.

OMB Control #	Responses	Burden Hours	Hourly Wage	Costs
1845-0184	39,578	674,054	\$99.96	\$67,378,438
Public	13,471	269,057		
Private	11,678	206,186		
For-profit	14,749	258,013		
1845-0184*	284,575	2,300,810	\$99.96	\$229,988,967.70
Public	177,569	1,293,407		
Private	12,659	256,010		
For-Profit	94,347	751,393		
1845-0174	88,779	15,739	\$99.96	\$1,573,270.44
Public	109	109		
Private	670	670		
Individual	88,000	14,960		
1845-0173	130,669	22,924	\$ 99.96	\$2,291,483.04
Public	4	18		
Private	18	81		
For-Profit	142	639		
Individual	130,505	22,186		
Total	543,601	3,013,527	\$99.96	\$301,232,159

1845-0184* represents the existing burden requirements of the information collection.

In total, we are requesting 543,601 responses and 3,013,527 burden hours.

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 consider 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 are no additional costs.

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.

There are no additional costs.

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	+712,717		
Total Responses	+259,026		
Total Costs (if applicable)			

This is a request for a revision of a currently approved information collection. The Department is also requesting that the requirements and burden from 1845-0173 Gainful Employment Student Warnings and Acknowledgments and 1845-0174 Student disclosure acknowledgments be merged with this collection (1845-0184) and be renamed 1845-0184 Earnings Accountability Reporting, Disclosures, and Warnings. It no longer makes sense to separate these collections with the proposed harmonization of regulations. We are requesting an increase of 712,717 burden hours and 259,026 responses for a total of 543,601 responses and 3,013,527 burden hours.

- 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.**

Calculations will be made available on the Federal Student Aid Data Center to meet the transparency efforts for the public.

- 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 Department is not seeking this approval.

- 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 for Paperwork Reduction Act Submissions" of OMB Form 83-I.