Tracking and OMB Number: 1820-0686
Revised:

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

Special Education - Individual Reporting on
Regulatory Compliance Related to the Personnel Development Program
Service Obligation

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.

1a. Circumstances Making the Collection of Information Necessary

This request is for a revision of the existing approved form (1820-0686).

Section 662 of IDEA requires OSEP to collect data to confirm that scholars who receive funding under this program complete their service obligation requirements. ED is responsible for collecting the necessary information, verifying the completion of the service obligation, and referring scholars to the Accounts Receivable and Bank Management Division (ARBMD) for repayment, if necessary.

These data are used to assess program effectiveness and efficiency, and to inform performance reporting under 34 CFR 75.110. To collect the needed data, OSEP created the Personnel Development Program Data Collection System (PDPDCS). Through the PDPDCS, the grantees, scholars, and employers report data electronically.

1b. Authorization for Collection

This data collection is authorized by the following Public Laws:

The information is being collected under the authority of the *Individuals with Disabilities Education Act (IDEA)* (20 U.S.C. 1462) and the implementing service obligation regulations at 34 CFR Part 304, as well as reporting requirements under 34 CFR 75.110. In particular, these sections authorize this collection:

> 1) The service obligation requirement of the Personnel Development Program can be found in IDEA, Public Law 108-446, section 662(h)(1) which states that "Each application for assistance…shall include an assurance that the eligible entity will ensure that scholars who receive a scholarship under the proposed project agree to

subsequently provide special education and related services to children with disabilities, or in the case of leadership personnel to subsequently work in the appropriate field, for a period of two years for every year which the scholarship was received or repay all or part of the amount of the scholarship, in accordance with regulations issued by the Secretary. Section 662(h)(3) "Secretary's responsibility.—The Secretary—(A) shall ensure that individuals described in paragraph (1) comply with the requirements of that paragraph."

a) For scholarships made from grants made in fiscal year (FY) 2006 and every year thereafter, 34 CFR 304.23 through 304.30, which implements section 662(h) of IDEA for those fiscal years; and
b) For scholarships made from FY 2005 grants, the notice published in the Federal Register on March 25, 2005 (70 F23-R 15306), which implements section 662(h) of IDEA for that fiscal year.

2) Public Law 108-446, section 662(a) (20 U.S.C. 1462) "The Secretary shall, on a competitive basis, make grants to, or enter into contracts or cooperative agreements with, eligible entities…to help address the needs identified in the State plan…for highly qualified personnel…to work with infants or toddlers with disabilities, or children with disabilities."

3) Public Law 108-446, section 682(c) (20 U.S.C. 1482) "The Secretary may use funds made available to carry out subpart 2 or 3 to evaluate activities carried out under subpart 2 or 3, respectively."

4) Education Department General Administrative Regulations (EDGAR) require that grantees cooperate in any evaluation of the program by the Secretary (EDGAR, section 75.591) (20 U.S.C. 1221e-3 and 3474).

1c. Review Type/Changes to the Collection

This submission represents a revision of the previously approved data collection. The proposed changes to this collection are described below. OSEP proposes the following minimal changes to reduce respondent burden, clarify instructions, and better align to service obligation regulations. These changes will be implemented in a revised website design that will optimize GPRA reporting capabilities and significantly improve efficiency for all users.

Grantee Data Collection (Scholar Record)

1. Remove demographic questions.
2. Condense section G, questions 5 and 6, and section H to improve efficiency in reporting. No collected information will be altered as a result of this change.

Scholar Data Collection (Scholar Training and Employment Record)

1. No substantive changes made.

2. No substantive changes made.

Grantee/Scholar Data Collection (Pre-Scholarship Agreement)

1. No substantive changes made.

Grantee/Scholar Data Collection (Exit Certification)

1. No substantive changes made.

Employer Data Collection (Employment Verification Record)

1. No substantive changes made.

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 first use for the data being collected is to fulfill requirements for performance reporting under 34 CFR 75.110. Grantees are required to report on their progress toward meeting the objectives and goals established for each ED grant program.

The second use of the data is to fulfill the requirements of IDEA 2004 and the corresponding regulations (Service Obligations Under Special Education – Personnel Development to Improve Services and Results for Children with Disabilities 2006) to verify the fulfillment of the service obligations of scholars who receive scholarships from Institutions of Higher Education (IHEs) (grantees) under OSEP's Personnel Development to Improve Services and Results for Children with Disabilities program. These requirements include grantee, scholar and employer input as well as referral of scholars to the ARBMD for repayment of part or all of the scholarship received, if they are not fulfilling their obligations through service.

Finally, the data collected are used by OSEP for project monitoring and program improvement, and to provide information on the outcomes of the grants (program completion, certification, employment in the area supported by training, etc.). Collection of these data is critical in assessing accountability for the grant program.

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.

OSEP collects all data in a web-based data collection system which is maintained on a secured server. Grantees and scholars log into the PDPDCS through either their email address and a password or through Login.gov to enter data. Employers are provided secure links to review and verify employment. The system is designed to minimize burden on respondents by programmatically skipping inapplicable items and storing and displaying data previously entered. For many items, users simply review data previously entered and verify its continued accuracy. The data collection instruments and frequently asked questions will be available online to respondents.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

   There is no duplication of reporting efforts. The information requested for this reporting in the PDPDCS is not collected or reported elsewhere.

   Data to determine whether a school is "high-need" to calculate the performance measures is not collected from any respondents to reduce burden. These demographic data are gathered from ED's Common Core of Data by the contractor. Determining a "high-need" school is necessary to calculate the performance measure on the number and percentage of scholars who complete the program and who are employed in high-need schools.

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

   The information requested rarely involves the collection of information from small businesses. There may be some employers classified as small businesses; however, the Employment Verification Record was designed to solicit only the information necessary to respond to program requirements. Thus, the burden of reporting is minimized to only those elements necessary to meet Federal requirements for budget and program activity data. In addition, this system utilizes a secure online tracking system, which allows employers to easily review information already entered by the scholar and then submit verification or provide revisions. They do not need to re-enter any data apart from specific changes to data the scholar previously entered

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.

Scholar follow-up is necessary for the program office to monitor service obligation requirements. To require less frequent data collection would result in the inability of the Secretary to assure that grantees and scholars are complying with the statutory requirements for service obligation and submit scholars for monetary repayment of their funds if they are deemed non-compliant. In addition, these data are needed annually so that OSEP can meet its PDP annual program performance measure reporting requirements under 34 CFR 75.110.

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 the collection to be conducted in a manner inconsistent with OMB guidelines.

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.

This updated Information Collection Request is not associated with rulemaking, as a result official public comment has not occurred. Significant input and feedback have been provided by current system users through optional feedback surveys and an analysis of Help Desk inquiries. .

Both 60-day and 30-day Federal Register notices will be published.

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

There are no payments or gifts to respondents in support of the data collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of

confidentiality should be provided.[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.

All data collection activities will be conducted in full compliance with ED regulations. Data collection activities will be conducted in compliance with The Privacy Act of 1974, P.L. 93-579, 5 USC 552 a; the "Buckley Amendment," Family Educational and Privacy Act of 1974, 20 USC 1232 g; and related regulations, including but not limited to: 41 CFR Part 1-1 and 45 CFR Part 5b and, as appropriate, the Federal common rule or ED's final regulations on the protection of human research participants. This is to maintain the confidentiality of data obtained on private persons and to protect the rights and welfare of human research subjects as contained in ED regulations. The Privacy Impact Assessment (PIA) for the Personnel Development Program Data Collection System, was published on October 29, 2019. In accordance with the Privacy Act of 1974, a system of records (SORN) entitled the "Personnel Development Program Data Collection System (PDPDCS)" (18-16-04) was published on July 10, 2019.

Project staff and contractors will adhere to the regulations and laws regarding the confidentiality of individually identifiable information. In addition, the Personnel Development Program Data Collection System was reviewed by ED's Office of the Chief Information Officer (OCIO) for compliance with the Federal Information Security Management Act (FISMA), OMB Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance. The system most recently received an Authorization to Operate (ATO) on February 28, 2028.

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.

Questions regarding Social Security Number (SSN), employment status, and service obligation status may be considered sensitive. However, SSN, employment, and service obligation status questions are necessary to directly respond to performance measures and

[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)

program requirements for service obligation. In addition, the Accounts Receivable and Bank Management Division (ARBMD) and the Department of Treasury require SSNs when scholars are referred, because they did not repay their service obligation through eligible employment and must, therefore, repay part or all of the funding they have received.

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.**

Three different sources—the grantees, scholars, and employers—will be asked to report or verify information in the PDPDCS. This can be done entirely electronically since the introduction of previously paper forms, which has also reduced the burden hours per respondent. For all respondents, much of the information in these forms are pre-populated and require only verification.

Table A-1 presents the **maximum** annual burden estimates of 9,210 combined hours for grantees, scholars, and employers. The program office estimates that 375 active grantees, 10,831 scholars, and 10,831 employers will respond to this collection based on data from FY 2019 – FY 2024. On average, each of the 375 grantees will have about 22 scholars in their cohort over the course of the 5-year grant. Grantees are encouraged to enroll scholars within

the first 2-3 years of their grant to ensure all scholars are able to complete the program on time. To assume the maximum burden estimate, the following data is based on an average Year 3 of a PDPDCS grant.

For burden estimates, we assume that grantees and employers have an hourly rate of $42 based on the average salary for administrators and professors in postsecondary special education. We assume an average hourly rate of $36 for scholars, understanding that some scholars may not yet be employed, some may be earning more as administrators, and some may be earning less as teachers or while in deferment. Given these rates and the hour estimates above, the maximum estimated annual burden is $359,184.12 across all grantees, scholars, and employers. Below, we describe how these estimates were derived for each instrument or activity.

Grantees: Pre-Scholarship Agreement and Scholar Record

The Pre-Scholarship Agreement (PSA) is completed only once per scholar per grant. These agreements are completed and signed by both the project director and the scholar at the time the scholar enrolls in the grant-supported training. During Year 3 of a PDPDCS grant, a grantee would likely enroll the remaining half of their 22 scholars, so they would need to complete about 11 PSAs.

Grant project directors are expected to meet with scholars (either in person or virtually) prior to the scholars' receiving OSEP funding to review the PSA and the PDPDCS requirements. We estimate that it takes grantees about 15 minutes per scholar to hold the meeting and prepare the PSA for scholar review. Grantees can then choose to either upload a PDF of the PSA (which may be signed during the meeting) or use the digital PSA form within the PDPDCS.
After the PSA process, the grantee must then complete the scholar record in the PDPDCS for each scholar. If they used the digital form, responses to several sections will be pre-populated for the grantee. We estimate it will take 15 minutes for the grantee to complete the scholar record, for a total of 30 minutes for the grantee to complete both the PSA and the scholar record for each scholar.

Grantees: Update Scholar Record

We estimate that each of the 375 active grantees will respond to this data collection instrument annually. To identify maximum burden, during Year 3, we estimate that the grantees will need to update the scholar record for the 11 scholars that were enrolled during Year 2. During the annual update, grantees will review information already entered in the Scholar Record, and typically update responses to less than 5 questions. We estimate this process will take about 5-7 minutes per scholar.

Grantees: Exit Certification

The Exit Certification (EC) is completed only once per scholar per grant. The ECs are signed when a scholar completes the grant training program or exits prior to completion. On

average, grantees exit about 30% of their scholars each year (about 7 scholars per grant) for a total of 2,625 scholars each year. This accounts for both scholars who graduate and scholars who exit prior to completion.

Grant project directors can choose to either upload a PDF of the signed EC or use the digital EC form within the PDPDCS, which is pre-populated with data from the completed scholar record. We estimate that it takes grantees about 10 minutes to meet with the scholar, sign the form, and complete the PDF upload or the digital EC form.

Scholars: Complete Pre-Scholarship Agreement

The Pre-Scholarship Agreement (PSA) is completed and signed only once per scholar per grant. The grantee will pre-fill the PSA (either the PDF or digital form) and meet with the scholar to go over the service obligation requirements and sign the form. Scholars, therefore, only need to review and sign the form. We estimate it will take scholars an average of 15 minutes to meet with the grantee and complete the PSA.

Under the assumption that for maximum burden in Year 3, each of the 375 grants will enroll about half of their cohort (11 scholars), so it follows that that 4,125 scholars will need to complete the PSA that year.

Scholars: Exit Certification

The Exit Certification (EC) is completed and signed only once per scholar per grant. The information within the EC is taken directly from the scholar record (regardless of whether they use the PDF or digital form), so the scholar should already be familiar with it. We estimate it will take scholars between 5-10 minutes to complete the EC for an average of about 7.5 minutes.

Under the assumption for maximum burden in Year 3, each of the 414 grants will enroll about half of their cohort (11 scholars), so it follows that 4,125 scholars will need to complete the EC that year.

Scholars: Update Scholar Training and Employment Record

The number of scholars entering data in any given project year will vary. Our estimate is based on the e 10,831 scholars currently in the PDPDCS who have been exited and are still eligible to fulfill their service obligation. Although scholars can begin entering employment after completion of one academic year, they are not required to do so until they have exited the training program. Scholars are also granted a 5-year grace period upon exit. The estimated number of scholars includes scholars who are currently fulfilling their obligation, those who are in their grace period and may not currently be fulfilling their obligation, but does not include scholars who are still enrolled in the program.

Once a scholar enters their employment, they are then expected to resubmit their employment record every 6 months until their obligation is fulfilled or create a new employment record if

they change jobs. We anticipate it will take scholars about 15 minutes to create a new employment record and about 5 minutes to resubmit it, for an average of 10 minutes per year.

Employers: Employment Verification Record

Employers must review a scholar's employment record and indicate whether they agree or disagree with the information entered. Scholars typically create a new employment record annually and resubmit the same information 6 months later. The estimate assumes the maximum amount of burden, meaning all 10,831 scholars submit employment every 6 months. However, some scholars: a) exercise their allowable grace period; b) do not stay employed in education; or c) enter deferment due to an approved reason. Therefore, the number of employers asked to verify may be substantially lower than the number of scholars who are eligible to fulfill through service. We anticipate the employers' burden to be 5 minutes per verification, completed twice per year.

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Estimated Number of Respondents	Number of Responses per Respondent	Estimated Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Complete Pre-Scholarship Agreement and Scholar Record (Grantee)	375	11	4,125	0.5	2,063	$42	$86,625
Update Scholar Record (Grantee)	375	11	4,125	0.1	413	$42	$17,325
Complete Exit Certification (Grantee)	375	7	2,625	0.15	394	$42	$16,538
Complete Pre-Scholarship Agreement (Scholar)	4,125	1	4,125	0.25	1,031	$36	$37,125
Complete Exit Certification (Scholar)	2,625	1	2,625	0.125	328	$36	$11,813
Update Scholar Training and Employment Record (Scholar)	10,831	2	21,662	0.15	3,249	$36	$116,975
Employment Verification	10,831	2	21,662	0.08	1,733	$42	$72,784

Information Activity or IC (with type of respondent)	Estimated Number of Respondents	Number of Responses per Respondent	Estimated Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Record (Employer)[1]							
Annualized Totals	29,537	34	60,949		9,210		$359,184.12

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.)

We do not anticipate additional costs to respondents resulting from this collection other than that already reported in Question 12, including capital or start-up costs, or operation, maintenance, or purchase of services. It is assumed that all respondents have access to a computer either through the grantee Institution of Higher Education or their place of employment. The data collection contractor maintains a toll-free Help Desk number to allow respondents reliable access to support services. This Help Desk could assist a respondent without reliable access to a computer. Some respondents, depending on the technology used, may bear some cost of the communication (e.g., cell phone or email service costs); however, it is not possible to identify a specific cost given the range in service options.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The total annual cost to the Federal government reflects the combined costs for OSEP to contract the data collection and reporting tasks and provide management and oversight of that contract (see Table A-2 below).

Table A-2. Total Annual Cost to Federal Government by Type of Cost

Type of Cost	Cost
OSEP Staff (salaries)	$163,861
Contractor Data and Reporting Services (Fixed price)	$1,081,408.02
Total	$1,245,269.02

OSEP has secured a fixed price contract with AnLar and Westat to create and manage the online data collection system. The fixed cost for this contract is $$1,081,408.02for Option Year 4 (July 1, 2026 – June 30, 2027). These costs include the development and maintenance of the system, support for respondents, and preparation of reports. The majority of communications with respondents will be electronic; however, scholars who do not respond to electronic or telephone communications will be sent follow-up letters. The costs for those mailings are included in the contract.

The PDP program office maintains a program specialist (.5 FTE) whose function is to manage the contract and 14 tasks. This program position is a GS-14, which, according to the 2025 General Schedule,ranges from $142,488 to $185,234 in annual salary for the Washington D.C. locality. OSEP staff salaries also include the estimated cost of an additional person (GS-14) assigned to support the contract on, in particular, debt referrals.

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).

There is an adjustment decrease of 1,664 annual burden hours and an adjustment decrease of 12,419 responses due to a re-estimate of the number of respondents.
Decrease in Grants, Scholars, and Employers

Our calculations show an adjustment from 414 to 375 active grantees and 13,581 to 10,831 scholars since the last OMB package was submitted. The PDP program has fewer active grants participating in the system, which has led to a decrease in the number of scholars that are eligible to fulfill their obligation through service. The estimate of 375 active grants was calculated by taking the average number of newly funded OSEP PDP grants over the past five years (70 grants) and multiplying that average by the five-year funding period (350). To ensure we are calculating the maximum burden, we added the standard deviation of 25 to the number of grants, which equals 375 grants.

Because the number of active grants has decreased, the number of active scholars and employers, as well as the estimated number of responses from these groups, has decreased.

Table A-3. Adjustment Changes

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden	N/A	N/A	-1,664
Total Responses	N/A	N/A	-12,419
Total Costs (if applicable)	N/A	N/A	N/A

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 performance data will also be submitted on an annual basis to ED's Budget Service for publication in ED's Budget Justification as required by the Government Performance and Results Act (GPRA). . The GPRA report will include descriptive analyses of all variables collected. The number of scholars and percentages, as well as measures of central tendency when appropriate, will be presented by grant type in table format. The report will also provide data to monitor the fulfillment of scholar service obligation and grantee and scholar compliance with the program regulations. Bulleted text and an executive summary will be provided to highlight key findings. All data will be in an aggregate form to protect PII and no PII information will be published. No complex analytical techniques will be used.

Table A-4 below summarizes the data collection and reporting timeline. Respondents will have continuous access to the online data collection system; however, analyses will be conducted on a snapshot of the data to document the previous fiscal year.

Table A-4. Data Collection and Reporting Timeline

Task	Month(s)
Respondents enter data	Ongoing
Snapshot taken of data	April
Data quality checks and updates	June-July
Performance reporting for previous FY	July-August

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

This item is not applicable as the OMB expiration date will be displayed for each respondent type the first time they login or enter the system.

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

There are no exceptions to the certification statement.