Docket: ED-2026-SCC-2872 Special Education-Individual Reporting on Regulatory Compliance Related to the Personnel Development Program's Service Obligation

OSERS received one comment. The information requested by the submitter was already included in the supporting statement. Therefore, no revisions were made to this collection based on the comment received.

OSERS will respond to comments received during the 30-day comment period.

#	Date	Commenter	Comment ID Number	Tracking #	Comment	Analysis/Response
1	10/30/26	Anonymous	ED-2026-SCC-2872-0004	mvv-vefl-unp6	The Department seeks approval for an information collection involving scholars, employers, and grantee institutions participating in the Personnel Development Program (PDP). The collection involves personal information, educational and employment records, service-obligation determinations, periodic employment verification, and information that may result in referral to the Department's Accounts Receivable and Bank Management Division (ARBMD) for monetary repayment. The Department reports 60,949 annual responses and 9,210 annual burden hours. The Department's published notice does not provide sufficient itemized information to independently evaluate the accuracy of those estimates, the amount of recurring reporting required of each respondent category, or whether the proposed collection minimizes duplicative reporting and unnecessary personal information. The existing system is substantially more extensive than a one-time scholarship agreement or a simple employment confirmation. It requires continuing participation by individual scholars, grantees, and employers over the period of the service obligation. The Department must account for the actual reporting process, including repeated employment submissions, six-month Notice of Intent updates, employer verification, corrections, record maintenance, technical assistance, deferral requests, and the consequences associated with failure to submit information. The Department cannot satisfy the PRA merely by publishing an aggregate estimate of annual responses and hours. It must establish that the estimate is objectively supported, that the collection has practical utility, that the reporting requirements are not unnecessarily duplicative, and that the collection is the least burdensome reasonably necessary to carry out its statutory functions. The Department should not receive renewed approval without a complete, transparent,	OSERS appreciates the submitter's comments. The submitter requested additional information on how estimates were calculated and the reporting process. The supporting statement provides detailed information on how burden estimates were calculated for each user group (i.e., grantee, scholar, and employer) and the basis for how those estimates were calculated (pgs. 8-12). Further, a table is provided that provides detailed estimated annual burden by user group, estimated number of responses, and estimated amount of time per response (see pgs. 11-12). All users and their repeated uses within the system are accounted for in the Supporting Statement and estimates. Duplicative processes and reporting requirements have been consolidated over the years as evidenced by the reduction of burden hours from previous information collection requests (ICRs). No changes were made to

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					and objectively supported burden analysis. I request that OMB withhold approval until the issues identified below are addressed and the revised information collection is supported by a compliant record.	the current ICR given the detailed information in the current supporting statement addresses the submitter's comments.