Tracking and OMB Number: 1840-0744
Revised: 8/19/2026

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.**

   This is revision to an existing data collection which supports the reporting required under Title II of the Higher Education Act of 1965, as amended (HEA), of the State Report Card (SRC) and Institution and Program Report Cards (IPRC). The attached forms reflect the electronic submission format respondents use to enter required information supporting the Title II data collection. Title II of the HEA mandates the Title II Teacher Quality Accountability data collection and a report by the Department to the U.S. Congress to provide more meaningful data on teacher preparation program quality.

   Although the statutory reporting requirements for States and institutions of higher education (IHEs) in section 205(a) and (b) are extensive, a chief purpose of this reporting is to improve the overall quality of teacher preparation programs and the programs' ability to produce teachers who are well-prepared to teach when they enter the classroom. This submission is for a slight revision of the instructions to reiterate to institutions where additional information can be entered.

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.**

   In alignment with the authorizing statute, the information is collected to help provide meaningful information on program quality to prospective teacher candidates, parents, school districts, States, and IHEs that administer traditional teacher preparation programs and alternative route teacher preparation programs leading to State certification or licensure. This information collection would make data available that will better inform academic program selection, program improvement, and accountability.

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.**

All States submit electronic data to the Department using a web-based reporting system. To minimize the burden on respondents, ED prepopulates Title II Report Cards wherever possible and provides efficient item entry formats and edit checks. Report Cards, as e-report forms, expedite electronic reporting by using radio buttons to save, exit, and reset in various conditions, text boxes, check boxes, drop down lists, and provide options for assistance with numerous data points reported in lists, real-time edit checks and spell-check. States are required by the HEA to report teacher preparation program participants' pass rates on the SRC, which most states expedite by using testing companies to calculate pass rates, and a few States themselves calculate the teacher test pass rates and upload them into the system.

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 information collected does not duplicate any other information collection effort in the Department. There is no similar information available that can be used or modified for this collection's 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.**

   A 4-Year institution with a revenue of less than $27.5 million or a 2-Year institution with a revenue less than $20.5 million is considered a small entity according to the Small Business Administration. The survey instrument does not collect data on revenue, but we estimate that there are between 200 and 300 small entities that could be affected by this data collection. No methods are being used to minimize the impact on the small entities because the data collection is statutorily mandated, and Congress did not allow for less burdensome collection for small businesses. The Department is making changes to reduce burden to limit the collection to that which is statutorily required and to reduce burden where possible by improving efficiencies in collection. Therefore, the Department believes that no additional methods for small entities need to be deployed.

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.**

   Title II of the HEA mandates this annual data collection. The Secretary as well as the States, institutions and programs required to report would be out of compliance with the statute if the information were not collected annually and reported in a timely manner.

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 in any of the ways listed as part of this question.

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 section is pending the completion periods of both the 60-day and 30-day Federal Register notices. Responses to any comments received will be updated, here.

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

   No payment or gift will be provided to respondents in connection with this 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.**

[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, and OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information).

The information being requested through these Report Cards is required, not voluntary. Much of the required information is public information because teacher credential requirements are a matter of public record in all States and jurisdictions. The production and verification of pass rates, which involve personally identifiable data, will be handled in accordance with all applicable State and federal laws, including privacy laws. In accordance with the HEA, pass rates on tests taken by fewer than 10 examinees will not be reported. Individually identifiable data will also be handled in accordance with all relevant laws, including privacy laws.

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.

Privacy protected information is not collected in either State or Institutional Report Cards, and none of the data points are of a sensitive nature.

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

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. Use this site to research the appropriate wage rate. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

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

The statute requires that IHEs and States establish an information and accountability system through which the nation's roughly 2,200 IHEs providing teacher education programs and all States report on the performance of their teacher preparation programs.. States report data on both traditional and alternative routes to certification programs, including programs based at an IHE and those not based at IHEs. As reported in *The Secretary's 13th Report to Congress on Teacher Quality,* 66%of teacher prepareation programs are traditional,24% are alternative programs offered at an IHE, while an additional 11% of programs are alternative programs offered outside of an IHE. .

The reporting associated with this collection is divided into burden to IHEs under the IPRC and States under the SRC.

Section 103(20) of the HEA defines "State" to include nine locations in addition to the 50 States: the Commonwealth of Puerto Rico, the District of Columbia, Guam, American Samoa, the United States Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Freely Associated States, which include the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau. For this reason, all reporting required of States explicitly enumerated under §205(b) of the HEA apply to these 59 States.

There is an estimated burden of 240 hours per State to report on the SRC. The respondents for SRC are 59 U.S. States and jurisdictions, reporting annually. The total burden for the SRC is 14,160 hours. The SRC will continue to collect data in the aggregate at the institution or entity level on number of participants served in traditional and alternative route teacher preparation programs and by program for non IHE-based alternative routes at the program level.

There is an estimated burden on 145 hours per IHE and Teacher Preparation Program to report on the IPRC. The IPRC burden hours are updated from the last clearance to reflect an increased number of approximately 2,200 teacher preparation programs, resulting in a total burden 319,000 (145 X 2,200) hours.

The estimated mean cost per hour of state and local government staff assigned to this task, including those at public IHEs, is approximately $65.28 according to the Bureau of Labor Statistics (BLS). This results in an estimated total cost of $15,667.20 for a State to complete and submit the SRC and $9,465.60 for an IHE or Program to complete and submit the IPRC

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	Number of Respondents	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)
IPRC			2.200	2.200	145	\319,000	$65.28	$20,824,320
SRC			59	59	240	14,160	$65.28	$924,364.80
Annualized Totals			2,259	2,259		333,160		$21,748,684.80

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory**

compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.

Total Annualized Capital/Startup Cost :
Total Annual Costs (O&M) :_____
Total Annualized Costs Requested :

Apart from the costs reflected in the latter part of item 12 and in item 14, there is no additional cost burden to respondents or record keepers resulting from the collection of information.

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 annualized cost to the Federal government will be approximately $850,000. This includes the equivalent of one senior officer's staff time, a contract officers' representative (COR), and the cost of employing a contractor to refine and maintain the data collection Report Cards, collect, tabulate and analyze the data, support the Title II Web site for perpetual access, and prepare drafts of the Secretary's annual report on the quality of teacher preparation programs and state requirements for teacher credentials based on the data collection findings. Additionally, the contractor provides technical assistance to 59 states and 1,735 institutions and non IHE-based teacher preparation programs for implementation and maintenance of the electronic reporting system and the collection of accurate and complete data annually.

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		**-3**	
Total Responses			**465**
Total Costs (if applicable)			

A section on the impacts of COVID-19 is no longer needed and has been removed from both the SRC and IPRC. This, along with an adjustment to ED's estimate of the number of hours required for each instrument has resulted in a reduction in the expected burden of this collection. The number of expected responses has also been updated to reflect the number of programs requiring response in recent years.

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 Secretary of Education submits an annual report on the Title II program to the Congress each year through the Department's Title II program. The Title II program office receives information from States on the State Report Card (SRC) and prepares and analyzes the information for presentation to Congress within a year of the SRC reporting deadline of October 31. The State collects information on teacher preparation entities and programs using the Institution and Program Report Card (IPRC) or other form, if the State prefers. There are no complex analytical techniques applied to the data as descriptive statistics are generally used accompanied by explanatory text.

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.

ED will display the expiration date for OMB approval of the information collection on the first page of the annual SRC, the annual IPRC, and the User Manuals.

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

There are no exceptions to the statement.