

## **SUPPORTING STATEMENT**

Information Collections Under the Proposed Regulations Governing the Student Assistance General Provisions.

### **A. Justification**

#### **1. Necessity of Information Collected**

The General Provisions regulations revise current regulations in the areas of program administration. These proposed regulations are a result of regulatory review of the program regulations to reduce administrative burden for program participants, provide benefits to Title IV, HEA program recipients, and protect the taxpayers' interest. This request is for approval of reporting requirements contained in the attached proposed regulations related to the General Provisions administrative requirements for the Title IV, HEA programs. The information collection requirements in these proposed regulations are necessary to determine eligibility to receive program benefits and to prevent fraud and abuse of program funds.

The Department of Education announced in a September 9, 2009 Federal Register notice (74 FR 46399), the Department's intention to establish negotiated rulemaking committees to prepare proposed regulations under Title IV of the Higher Education Act of 1965, as amended (HEA). These committees were formed as a result of a Federal Register notice published on May 26, 2009 (74 FR 24728) which announced a series of three regional hearings at which interested parties could comment on topics suggested by the Department and suggest additional topics for consideration. Team I on Program Integrity Issues included the topic of ensuring that Federal Pell Grant recipients could obtain credit balances to obtain or purchase their books and supplies was among the additional topics considered and thereby included in the final list of topics for negotiated rulemaking. Team II – Foreign Schools Issues included certification procedures and financial responsibilities.

**General Provisions:** (OMB control number: 1845-0022)

#### **Team I – Program Integrity Issues - (RIN 1840-AD02)**

Sections 668.8, 668.16, 668.22 and 668.43 contain information collection requirements. Under the Paperwork Reduction Act of 1995 (44 U.S.C. 3507(d)), the Department of Education is submitting a copy of these sections to the Office of Management (OMB) for its review. We are proposing the following changes to those sections:

#### **Section 668.8 – Eligible program.**

Section 668.8(k) & (l): The proposed regulations in §§668.8(k) & (l) require that when an institution offers an undergraduate educational program in credit hours, the

institution must use the formula contained in §668.8(l) to determine whether a one academic year training program that leads to a certificate or other nondegree recognized credential and prepares students for gainful employment in a recognized occupation has sufficient credits hours for students in that program to receive Title IV, HEA funds. These proposed regulations are also applicable to proprietary and postsecondary vocational programs as provided in §668.8(d).

Programs that are at least two academic years in length and provide an associate degree, a bachelor's degree, a professional degree, or an equivalent degree, as determined by the Secretary, are exempt from the proposed clock hour to credit hour conversion. Also exempted are programs when each course within the program is acceptable for full credit toward that institution's associate degree, bachelor's degree, professional degree, or equivalent provided that the institutional degree requires at least two academic years of study and the institution demonstrates that students enroll in, and graduate from, the degree program.

For all non-exempt programs, the institution must perform the clock to credit hour conversion to establish whether the required minimum credit hours are met in order for students enrolled in those programs to be eligible to receive Title IV, HEA program assistance. The affected entities will be the institutions who will be required, as proposed, to make the calculations for the applicable programs to measure whether there are sufficient contact hours in the programs for students enrolled to obtain Title IV, HEA program assistance. Under proposed §668.8(l)(2)(i), outside student work may be combined with the clock hours of instructional time.

#### **Section 668.16 – Standards of administrative capability.**

Section 668.16(e): The proposed regulations in §668.16(e) currently address standards of satisfactory academic progress. As proposed, these standards along with some new requirements will be transferred to §668.34. As a result, the burden associated with this portion of currently approved OMB 1845-0022 as well as the burden associated with the newly proposed requirements will be administratively transferred to OMB 1845-NEW2 where all the recordkeeping, record maintenance and notification requirements under the proposed regulations will be located.

Section 668.16(p): The proposed regulations in §668.16(p) require an institution to develop and follow procedures designed to evaluate the validity of a student's high school completion. If the institution or the Secretary has reason to believe that the high school diploma is not valid or was not obtained from an entity that provides secondary school education, the proposed regulations require the institution to evaluate the validity of the diploma.

## **Section 668.22 – Treatment of title IV funds when a student withdraws.**

Section 668.22(a) & (f): The proposed regulations clarify when a student is considered to have withdrawn from a payment period or period of enrollment. In the case of a program that is measured in credit hours, the student would be considered to have withdrawn if he or she does not complete all the days in the in the payment period or period of enrollment that the student was scheduled to complete. In the case of a program that is measured in clock hours, the student would be considered to have withdrawn if he or she does not complete all of the clock hours in the payment period or period of enrollments. The proposed change in §668.22(f) would clarify that for credit hour programs, in calculating the percentage of the payment period or period of enrollment completed, it is required to take into account the total number of calendar days that the student was scheduled to complete prior to withdrawing without regard to any course completed by the student that is less than the length of the term. These proposed regulations would affect all programs with courses that are less than the length of the term, including, for example, a semester-based program that has a summer nonstandard term with two six-week sessions within the term.

## **Section 668.43 – Institutional information.**

Section 668.43(a)(12): The proposed regulations require that institutions who enter into written agreements with other institutions to have the other institution provide a portion of the educational program, to disclose a variety of information about the written arrangement to the student. That disclosure includes a description of the written arrangement explaining the portion of the educational program that the institution that grants the degree or certificate will not be providing. The disclosure must also provide the name and address of the other institutions or organizations that are providing the portion of the educational program that the institution that grants the degree or certificate is not providing. In addition, the disclosure of the written arrangement must include the method of delivery and any estimated additional costs that a student may incur as a result of enrolling in an educational program that is provided, in part, under a written arrangement.

Section 668.43(b): The current regulations in §668.43(b) require an institution to make available for review to any enrolled or prospective student, upon request, a copy of the documents describing the institution's accreditation and its licensing. Under the proposed regulations, these requirements are expanded to also include contact information for filing complaints with the institution's accreditor and approval or licensing entity.

## **Team II – Foreign Schools Issues – (RIN 1840-ACXX)**

Sections 668.13, 668.15, and 668.171 contain information collection requirements. Under the Paperwork Reduction Act of 1995 (44 U.S.C. 3507(d)), the Department of

Education is submitting a copy of these sections to the Office of Management (OMB) for its review. We are proposing the following changes to those sections:

**Section 668.13– Certification procedures.**

Section 668.13(b): The proposed regulations in §668.13(b) require that the period of participation for a private, for-profit foreign institution expires three years after the date of the Secretary’s certification (rather than the six year period of participation for domestic institutions). While the duration of the approval process is reduced from six years to three years and therefore the time associated with the submission for recertification will be filed more often, this proposed change in the regulations does not represent a substantive impact on the amount of annual burden generated by this proposed regulation.

**Section 668.15– Factors of financial responsibility.**

Section 668.15(h): There is no burden currently attributed to §668.15(h) in OMB Control Number 1845-0022, therefore there will not be the expected burden reduction as a result of the proposed removal of this section and its transference to §668.23. However, the proposed transfer of these regulations to §668.23 will generate an increase in burden which will be reflected in OMB Control Number 1845-0038.

**Section 668.171– General.**

Section 668.171(c)(2): The proposed regulations under Subpart L – Financial Responsibilities in §668.171(c)(2) establish that in order for a foreign public institution to be considered financially responsible, the institution must notify the Secretary that it is designated as a public institution by the country or other governmental entity that has the legal authority to make that designation. In addition, the foreign public institution must provide documentation from the country or other governmental entity confirming that the institution is a public institution and is backed by the full faith and credit of the country or other government entity. The proposed regulation also includes a requirement that the foreign public institution must not be in violation of the past performance requirements of §668.174. If a foreign public institution did not meet the new financial responsibilities requirements, the institution’s compliance would be determined under the general requirements of financial responsibility, including the application of the primary reserve, equity and net income ratios. Although the full faith and credit provision would provide an alternate way of meeting the financial responsibility standards for foreign public institutions, it would not excuse the institution from the required submission of audited financial statements.

## **2. Purpose and Use of Information Collected**

### **General Provisions:**

The information collected and reported in Subparts B and D of Part 668 – Student Assistance General Provisions will continue to be used for program participation and for student consumer information purposes. If we did not require the collection and reporting of information in Subparts B and D, we would not be able to conform the participation agreements with the statute, nor would we be providing the required disclosures to prospective and enrolled students.

## **3. Consideration of Improved Information Technology**

### **General Provisions:**

Under the proposed regulations the required disclosure information is generally made available to enrolled and prospective students via campus Web sites as an efficient and effective method of information disclosure at the lowest possible cost.

## **4. Efforts to Identify Duplication**

A thorough review of procedures indicates that current requirements are minimal and avoid duplication. This review was done in conjunction with affected parties who have a vested interest in eliminating duplication.

## **5. Burden Minimization as Applied to Small Business**

No small businesses are impacted by this collection.

## **6. Consequences of Less Frequent Data Collection**

Recordkeeping requirements are imposed to assure accountability of program participants for proper program administration and less frequent collection could impair accountability of program participants.

## **7. Special Circumstances Governing Data Collection**

The collection of this information will be conducted in a manner that is consistent with the guidelines in 5 CFR 1320.5(d)(2).

## **8. Consultation Outside the Agency**

The Notice of Proposed Rulemaking (NPRM) will be published in the *Federal Register* for comment. Prior to the approval of these proposed regulations the Department negotiated with members of the community during three sessions in early 2010.

## **9. Payments or Gifts to Respondents**

No payments or gifts will be provided to the respondents.

## **10. Assurance of Confidentiality**

There is no assurance of confidentiality provided to institutions for the submission of this information.

## **11. Questions of Sensitive Nature**

The Department is not requesting any sensitive data.

## **12. Annual Hour Burden for Respondents/Recordkeepers.**

### **Team I – Program Integrity Issues - (RIN 1840-AD02)**

#### **General Provisions:**

#### **Section 668.8 – Eligible program.**

Section 668.8(k) & (l): The proposed regulations in §668.8(k) & (l) require institutions to measure whether certain programs in §668.8(c)(3) and (d) when converted from clock hours to credit hours have sufficient credit hours for students in these programs to receive Title IV, HEA program assistance. The affected entities are institutions, who will have to perform the conversion calculations to convert clock hours to credit hours. Generally, under proposed §668.8(l)(1) institutions will use the following conversion ratio of at least 37.5 clock hours of instruction to 1 credit hour for programs measured in semester or trimester hours. For programs measured in quarter hours the conversion ratio is at least 25 clock hours to 1 quarter credit hour. Under proposed §668.8(l)(2), if neither the institution's designated accrediting agency nor the relevant State licensing authority for participation in Title IV, HEA programs has identified any deficiencies with the institution's policies and procedures, or their implementation, for determining credit hours that the institution awards for programs and courses, the institution's student work outside of class combined with the clock-hours of instruction meet or exceed the numeric requirements of §668.8(l)(1).

We estimate that of the 4,587 institutions of higher education with less than 2 year programs that on average each institution has approximately 8 non-degree programs of study. Therefore, there are 36,696 programs that will need to be evaluated consistent with proposed §668.8(k) & (l). Of those 4,587 institutions with the affected non-degree programs, we estimate that 2,086 of the affected institutions are in the proprietary or for-profit sector which is 45% of the total number of affected institutions. We estimate that 250 institutions with the affected non-degree programs are in the private, not-for-profit sector which comprises 5% of the total number of

affected institutions. We estimate that 2,251 of the affected institutions are in the public sector, which comprises the remaining 50% of the total number of affected institutions.

We estimate that on average, for each program it will take institution 30 minutes (.5 hours) to make the determination of whether the program is an affected program, to evaluate the amount of outside student work, where applicable, and to perform the clock hour to credit hour conversion.

As a result, we estimate that burden will increase for proprietary institutions by 8,257 hours, that burden will increase for private not-for profit institutions by 918 hours, and that burden will increase for public institutions by 9,174 hours.

Affected Entities:

# of Respondents:	# of Responses:	# of Burden Hours
<b>PROPRIETARY INSTITUTIONS:</b>		
36,696 non-degree programs X .45 = 16,513 programs X .5 hours = 8,257 hours		
2,086	16,513	8,257
<b>PRIVATE NOT-FOR PROFIT:</b>		
36,696 non-degree programs X .05 = 1,835 programs X .5 hours = 918 hours		
250	1,835	918
<b>PUBLIC INSTITUTIONS:</b>		
36,696 non-degree programs X .50 = 18,348 programs X .5 hours = 9,174 hours		
2,251	18,348	9,174
<b>TOTAL:</b>		
4,587	36,696	18,349

**Section 668.16 – Standards of administrative capability.**

Section 668.16(e): Currently, OMB 1845-0022 attributes 8,500 respondents, 8,500 responses and 51,000 burden hours to §668.16. We estimate that the sub-set of burden associated with the provisions of §668.16(e) related to standards of satisfactory academic progress impact 3,500 respondents, 3,500 responses and

21,000 hours of burden. As a result of the proposed regulations, the respondents, responses and burden hours attributable to §668.16(e) will be administratively transferred to §668.34 – Satisfactory academic progress.

# of Respondents:	# of Responses:	# of Burden Hours
-3,500	-3,500	-21,000

Section 668.16(p): The proposed regulations in §668.16(p) require an institution to develop and follow procedures designed to evaluate the validity of a student’s high school completion. We estimate that burden will increase for each institution 3.5 hours on average in its development of the procedures. For the estimated 2,086 proprietary institutions, we estimate that burden will increase by 7,301 hours. For the estimated 1,731 private not-for profit institutions, we estimate that burden will increase by 6,059 hours. For the estimated 1,892 public institutions, we estimate that burden will increase by 6,622 hours.

AFFECTED ENTITIES:

# of Respondents:	# of Responses:	Hrs/Response	# of Burden Hours
<b>PROPRIETARY INSTITUTIONS:</b>			
2,086	2,086	3.5	7,301
<b>PRIVATE NOT-FOR PROFIT:</b>			
1,731	1,731	3.5	6,059
<b>PUBLIC INSTITUTIONS:</b>			
1,892	1,892	3.5	6,622
<b>TOTAL:</b>			
5,709	5,709		19,982

Section 668.16(p): If the institution or the Secretary has reason to believe that the high school diploma is not valid or was not obtained from an entity that provides secondary school education, the proposed regulations require the institution to evaluate the validity of the diploma. Of the 20 million applicants for Title IV, HEA program assistance, we estimate that (.0002) will be questionable and therefore 4,000

diplomas will require additional review and a determination made about their validity. One school that is currently conducting these validity reviews indicated that on average each review took .5 hours (30 minutes).

We estimate that proprietary institutions will have 50% of the questionable diplomas to examine. 4,000 questionable diplomas X 50% X .5 hours equal an increase in burden of 1,000 hours.

We estimate that private not-for profit institutions will have 15% of the questionable diplomas to examine. 4,000 questionable diplomas X 15% X .5 hours equal an increase in burden of 300 hours.

We estimate that proprietary institutions will have 35% of the questionable diplomas to examine. 4,000 questionable diplomas X 35% X .5 hours equal an increase in burden of 700 hours.

**AFFECTED ENTITIES:**

# of Respondents:	# of Responses:	Hrs/Response	# of Burden Hours
<b>PROPRIETARY INSTITUTIONS:</b>			
2,000	2,000	.5	1,000
<b>PRIVATE NOT-FOR PROFIT:</b>			
600	600	.5	300
<b>PUBLIC INSTITUTIONS:</b>			
1,400	1,400	.5	700
<b>TOTAL:</b>			
4,000	4,000		2,000

**Section 668.22 - Treatment of title IV funds when a student withdraws.**

Section 668.22(a) & (f): We estimate that 17,400,000 students will complete and submit a FAFSA for Title IV, HEA funds. Of that number, we expect an enrollment rate of 87%, thus we estimate there will be 15,138,000 recipients of Title IV, HEA program assistance. We estimate that 10.8 % will withdraw from their coursework prior to the completion of more than 60% of the planned amount of days in the term

or clock hours in the payment period or the period of enrollment, resulting in 1,634,904 Title IV, HEA program assistance recipients who will not complete their expected term for which they received Title IV, HEA funds. Of the 1,634,904 withdrawals, we project that 26% will be in term-based programs with modules or compressed courses. We also estimate that 50% of the withdrawals will occur at proprietary institutions. We estimate that 10% of the withdrawals will occur at private not-for profit institutions and 40% will occur at public institutions. We estimate that on average, the burden associated with the proposed change to require a Return to Title IV Funds calculation to be 1 hour per withdrawal to collect all the information, perform that calculation and complete any required transactions as a result of the R2T4 calculation (including the institution sending Title IV, HEA funds back to the program or making available a post-withdrawal disbursement to the student).

$17,400,000 \times .87$  (the enrollment rate) = 15,138,000 students with Title IV, HEA program assistance.

15,138,000 students with Title IV, HEA program assistance  $\times .108$  (the withdrawal rate) = 1,634,904 students with aid that are projected to withdraw.

1,634,904 student would withdraw  $\times .26$  (the projected percentage of withdrawals who are in term-based programs with modules or compressed courses) = 425,075 affected individuals.

We project that 50% of the withdrawals for these term-based programs with modules or compressed courses will occur at proprietary institutions.  $425,075 \times .5 = 212,538$ . We estimate that the average amount of time it will take the institutional personnel to collect the data about the withdrawal, perform the required calculation and make any required refunds or post-withdrawal disbursements to be 1 hour per withdrawal.

We project that 10% of the withdrawals for these term-based programs with modules or compressed courses will occur at private not-for profit institutions.  $425,075 \times .1 = 42,508$ . We estimate that the average amount of time it will take the institutional personnel to collect the data about the withdrawal, perform the required calculation and make any required refunds or post-withdrawal disbursements to be 1 hour per withdrawal.

We project that 40% of the withdrawals for these term-based programs with modules or compressed courses will occur at public institutions.  $425,075 \times .4 = 170,029$ . We estimate that the average amount of time it will take the institutional personnel to collect the data about the withdrawal, perform the required calculation and make any required refunds or post-withdrawal disbursements to be 1 hour per withdrawal.

AFFECTED ENTITIES:

# of Respondents:	# of Responses:	Hrs/Response	# of Burden Hours
INDIVIDUALS:			
425,075	425,075	.75	318,806
PROPRIETARY INSTITUTIONS:			
2,086	212,538	1.0	212,538
PRIVATE NOT-FOR PROFIT:			
1,731	42,508	1.0	42,508
PUBLIC INSTITUTIONS:			
1,892	170,029	1.0	170,029
TOTAL:			
430,784	850,150		850,150

**Section 668.43 – Institutional information.**

Section 668.43(a)(12): The proposed regulations require that institutions who enter into written arrangements with other institutions to have the other institution provide a portion of the educational program, to disclose a variety of information about the written arrangement to the student or prospective student.

We estimate that 104 proprietary institutions will enter into 1 written arrangement per institution and that on average the burden associated with collecting the required information about the written arrangements and its disclosure will take .5 hours (30 minutes) increasing burden by 52 hours.

We estimate that 1,731 private not-for profit institutions will enter into 50 written arrangements per institution and that on average the burden associated with collecting the required information about the written arrangements and its disclosure will take .5 hours (30 minutes) increasing burden by 43,275 hours.

We estimate that 1,892 private not-for profit institutions will enter into 25 written arrangements per institution and that on average the burden associated with collecting

the required information about the written arrangements and its disclosure will take .5 hours (30 minutes) increasing burden by 23,650 hours.

AFFECTED ENTITIES:

# of Respondents:	# of Responses:	Hrs/Response	# of Burden Hours
<b>PROPRIETARY INSTITUTIONS:</b>			
104	104	.5	52
<b>PRIVATE NOT-FOR PROFIT:</b>			
1,731	86,550	.5	43,275
<b>PUBLIC INSTITUTIONS:</b>			
1,892	47,300	.5	23,650
<b>TOTAL:</b>			
3,727	133,954		66,977

Section 668.43(b): The current regulations in §668.43(b) requires an institution to make available for review to any enrolled or prospective student, upon request, a copy of the documents describing the institution’s accreditation and its licensing. Under the proposed regulations, these requirements are expanded to also include contact information for filing complaints with the institution’s accreditor and approval or licensing entity. We estimate that 8% of all institutions already provide this information.

We estimate that 92% of the 2,086 proprietary institutions will on average increase the burden associated with providing contact information for filing complaints with accreditors, approval or licensing agencies and its disclosure will take .5 hours (30 minutes) increasing burden by 326 hours.

We estimate that 92% of the 1,731 private not-for profit institutions will on average increase the burden associated with providing contact information for filing complaints with accreditors, approval or licensing agencies and its disclosure will take .5 hours (30 minutes) increasing burden by 271 hours.

We estimate that 92% of the 1,740 public institutions will on average increase the burden associated with providing contact information for filing complaints with accreditors, approval or licensing agencies and its disclosure will take .5 hours (30 minutes) increasing burden by 296 hours.

**AFFECTED ENTITIES:**

# of Respondents:	# of Responses:	Hrs/Response	# of Burden Hours
<b>PROPRIETARY INSTITUTIONS:</b>			
1,919	1,919	.5	326
<b>PRIVATE NOT-FOR PROFIT:</b>			
1,593	1,593	.5	271
<b>PUBLIC INSTITUTIONS:</b>			
1,740	1,740	.5	296
<b>TOTAL:</b>			
5,252	5,252		893

**Team II – Foreign Schools Issues – (RIN 1840-ACXX)**

Section 668.171(c): Under the current regulations in §668.171(c)(1), domestic public institutions are considered financially responsible if they notify the Secretary that the institution is a public institution by the State, local, or other municipal government entity, tribal authority, or other governmental entity that has the legal authority to make a determination that an institution is a public institution. In addition, the current regulations require domestic public institutions to provide a letter from the applicable governmental entity to the Secretary confirming that the institution is a public institution. Finally, in this section of the current regulations, a domestic public institution is considered financially responsible, if it is not in violation of any past performance requirements in §668.174. Proposed §668.171(c)(2), expands these requirements to foreign public institutions. If a foreign public institution did not meet the new financial responsibilities requirements, the institution’s compliance would be determined under the general requirements of financial responsibility, including the application of the primary reserve, equity and net income ratios. Although the full faith and credit provision would provide an alternate way of meeting the financial

responsibility standards for foreign public institutions, it would not excuse the institution from the required submission of audited financial statements.

Currently there are 359 foreign public institutions participating in the Title IV, HEA programs. There are 270 of those institutions (or 75%) that receive less than \$500,000 in Title IV, HEA program funds on an annual basis. Of the remaining, 89 foreign public institutions, we estimate that 15% or 13 foreign public institutions will take on average, 16 hours of additional effort to obtain documentation from the applicable governmental entity to confirm that the foreign public institution has the full faith and credit backing of its country, for a total increase in burden of 208 hours.

**Annual Cost of Burden to Respondents**

No additional cost to the respondents.

**13. Start-Up Cost Burden to the Respondents**

There are no start-up costs associated with these proposed regulatory changes.

**14. Estimated Annual Cost to the Federal Government**

There are no additional costs to the Federal government as a result of the final regulations.

**15. Reasons for Changes to Burden Hour Estimated**

The changes to the burden estimates in 34 CFR 668.16(p) are as a result of the proposed regulations to implement the statutory changes made by the Higher Education Opportunity Act (HEOA) (Pub. L. 110-315) to the Higher Education Act of 1965, as amended (HEA). The other proposed changes to the burden estimates in this supporting statement are for the purposes of process improvement and to prevent and counteract fraud, waste and abuse. Many of these changes are as a result of public comment during the hearings that preceded the negotiated rulemaking sessions.

Below is a summary of the changes in burden hours:

**Respondents, Responses and Burden Hours:**

**Team I – Program Integrity Issues - (RIN 1840-AD02)**

**Section 668.8 – Eligible program.**

Section 668.8 (k) & (l):

4,587	36,696	18,349
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**Section 668.16 – Standards of administrative capability.**

Section 668.16(p):

5,709	5,709	19,982
<u>Section 668.16(p):</u>		
4,000	4,000	2,000

**Section 668.22 - Treatment of title IV funds when a student withdraws.**

<u>Section 668.22(a) &amp; (f):</u>		
430,784	850,150	743,881

**Section 668.43 – Institutional information.**

<u>Section 668.43(a)(12):</u>		
3,727	133,954	66,977

<u>Section 668.43(b):</u>		
5,252	5,252	893

**TOTAL – Team I:**

# of Respondents	# of Responses	# Hours Burden
454,059	1,035,761	852,082

**Team II – Foreign Schools Issues – (RIN 1840-ACXX)**

<u>Section 668.171(c)(2):</u>		
13	13	208

**GRAND TOTAL – Teams I and II:**

# of Respondents	# of Responses	# Hours Burden
454,072	1,035,774	852,290

**Summary Current Burden Inventory:**

# of Respondents	# of Responses	#Hrs Burden
453,604	289,608	1,305,770

**Revised Burden Inventory:**

# of Respondents	# of Responses	#Hrs Burden
454,072	1,035,774	852,290

**Administrative Adjustment:**

Transferring 34 CFR 668.16(e) burden to 34 CFR 668.34.

# of Respondents	# of Responses	#Hrs Burden
-3,500	-3,500	-21,000

**TOTAL BURDEN INVENTORY:**

# of Respondents	# of Responses	#Hrs Burden
904,176	1,321,882	2,137,060

**16. Collection of Information with Published Results**

The results of the collection of information will not be published.

**17. Approval to Not Display Expiration Date**

ED is not seeking this approval.

**18. Exception to the Certification Statement**

ED is not requesting any exceptions to the "Certification for Paperwork Reduction Act Submissions".