

## **SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION**

Special Education - Individual Reporting on  
Regulatory Compliance Related to the Personnel Development Program  
Service Obligation and the Government Performance and Results Act  
(GPRA)

**Question 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section. 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, make note of the sections or changed sections, if applicable.**

### **1a. Circumstances Making the Collection of Information Necessary**

In order to ensure that OSEP is meeting the needs of children with disabilities and their families, OSEP needs to collect data on the results of its grant awards. These data include the number and characteristics (e.g., minority status, related professional experience) of professionals trained and the program outcomes (e.g., program completion, certification, employment in area supported by training). In addition, 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 meet the reporting requirements of the Government Performance and Results Act (GPRA). The data will provide information on the supply of the OSEP-funded projects nationally, within each state, and within and across personnel categories, including special educators certified to teach children with disabilities, university faculty, related-service personnel, preschool service providers, paraprofessionals, administrators and other personnel (see Question 2, below).

To collect the needed data, OSEP created the Personnel Development Program Data Collection System (PDPDCS). Through the PDPDCS 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 with the Government Performance and Results Act of 1993 (GPRA), section 4. 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 FR 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. To reduce respondent burden, clarify instructions, and better align to service obligation regulations, OSEP proposes the following changes to the instruments.

*Grantee Data Collection (Scholar Record)*

1. Replace the term “Data Collection Center (DCC)” with Personnel Development Program Data Collection System (PDPDCS)” to align with the title of system support services.
2. Revision of the instructions within Section D and K for submitting scholar agreements to align with the functionality of the system.
3. Revision of response questions and options in items regarding the scholar’s training areas and children with disabilities foci to align with IDEA definitions and terminology in the special education field (Section F, items 2b and 2c; Section G, items 4a and 4b; and Section J items 2a and 2b).
4. Revision of response questions and options in items about the scholar’s pre-entry and enrolled employment to align with IDEA definitions and terminology in the special education field (Section F, item 5 and Section H, item 4).
5. Revision of instructions within Section H Employment Information During OSEP Grant Program to improve user understanding and align with the functionality of the system.
6. Remove all sub options within Section J items 4b, 4c, 4d, and 4e and allow multiple selections within Section J item 4 to reduce data burden.
7. Remove Section J Item 6 to reduce data burden.

*Scholar Data Collection (Scholar Training and Employment Record)*

1. Replace the term “Data Collection Center (DCC)” with Personnel Development Program Data Collection System (PDPDCS)” to align with the title of system support services.
2. Revision of the instructions for Section F and G to improve user understanding.
3. Revision of response questions and options in items about the scholar’s employment type, training areas, and children with disabilities supported to align with IDEA definitions and terminology in the special education field ( Section G, items 2, 5, and 6.
4. Addition of license and certification options within Section J item 8.

*Grantee/Scholar Data Collection (Pre-Scholarship Agreement)*

1. Replace the term “Data Collection Center (DCC)” with Personnel Development Program Data Collection System (PDPDCS)” to align with the title of system support services.
2. Updated “Accounts Receivable and Bank Management Group (ARBMG)” with “Accounts Receivable and Bank Management Division (ARBMD)” to reflect new organization title.

*Grantee/Scholar Data Collection (Exit Certification)*

1. Replace the term “Data Collection Center (DCC)” with Personnel Development Program Data Collection System (PDPDCS)” to align with the title of system support services.
2. Updated “Accounts Receivable and Bank Management Group (ARBMG)” with “Accounts Receivable and Bank Management Division (ARBMD)” to reflect new organization title.

*Employer Data Collection (Employment Verification Record)*

1. No changes made.

**Question 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.**

There are three primary purposes for the data that are being collected. The first use is to fulfill Government Performance and Results Act (GPRA) reporting requirements. GPRA requires that Federally-funded agencies develop and implement an accountability system based on performance measurement. Grantees are required to report on their progress toward meeting the objectives and goals established for each ED grant program. However, OSEP needs data directly from scholars and their employers in addition to grantee data for GPRA reporting.

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 characteristics of teachers and other personnel supported in these preparation programs and 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. These data also serve as the primary source of information for OSEP to target program areas in need of improvement.

**Question 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. Also describe any consideration given to using technology to reduce burden. Use of Technology to Reduce Burden**

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 using their email address and a password 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.

**Question 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 is not collected or reported elsewhere. Data to determine whether a school is “high-need” 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.

**Question 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.

**Question 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. In addition, these data are needed annually so that OSEP can meet its PDP annual program performance measure reporting requirements under GPRA.

**Question 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.

**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. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**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, individually and through a technical working group, informing the changes proposed in response to Question 1. Specifically, all system user types, grantee, scholar, and employee users, provided feedback on the proposed changes outlined in the response to Question 1.

No comments were received during the initial public comment period. This is the request for the 30-day Federal Register notice inviting public comment; we will publish additional 30-day Federal Register notice inviting public comment.

**Question 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.

**Question 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. 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.**

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 June 1, 2014. In accordance with the Privacy Act of 1974, a system of records (SORN) entitled Special Education--Individual Reporting on Regulatory Compliance Related to the Personnel Development Program's Service Obligation and the Government Performance and Results Act of 1993 (GPRA)" (18-16-04) was published on October 24, 2008. A revised SORN and PIA will be published once OMB has approved the updated data collection instruments.

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 November 5, 2019.

**Question 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 GPRA measures and 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.

Race/ethnicity data are also collected. The IDEA 2004 emphasizes that the training of professionals in the area of special education by minority individuals is essential if the nation is to obtain greater success in the education of minority children with disabilities (Section 601(10)(D)). Collecting these data will assist in analyzing and increasing the number of minorities trained in special education.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **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, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. 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 the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. 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.**

Three different sources—the grantees, scholars and employers—will be asked to report or verify information about the scholar. The time taken by a scholar to complete the Scholar Training and Employment Record will vary based on the individual’s employment. The approximate time required for grantees to complete the Scholar Record and for employers to complete the Employment Verification Record will not vary widely. 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 8,328 hours for grantees, scholars, and employers. The program office estimates that 345 active grantees, 10,841 scholars, and 10,841 employers will respond to this collection. Given that scholars and employers are only able to submit and verify employment information once a scholar has completed one academic year of the training program, it is possible that not all scholars or employers in the counts below will respond in any given year; however, for the purposes of estimating burden, we assume that all of the 10,841 scholars will be employed. The actual number of grantees, scholars and employers may vary due to the availability of Federal appropriations, number of grant awards made, and the number of scholars recruited by each project. This is our best estimate taking these variables into consideration.

For burden estimates, we assume that grantee administrators and employers have an hourly rate of \$50. We assume an average hourly rate of \$25 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 \$331,774 across all grantees, scholars, and employers. Below we describe how these estimates were derived for each instrument.

#### *Grantees: Scholar Record*

We estimate that 345 grantees will respond to this data collection instrument annually. We estimate that the grantee will spend an average of 20 minutes per scholar entering and updating information each year, a reduction from previous years due to streamlined questions and improved instructions. Each grantee, based on an average of FY2014-FY2017 grantees, enrolls 24 scholars. The burden for grantees of completing the Scholar Record for all scholars each year is estimated at 7.92 hours per grantee per year. In many cases, the grantee will be reviewing and updating information already entered.

#### *Grantees: Pre-Scholarship Agreement*

The Pre-Scholarship Agreement is completed only once per scholar per grant. These agreements are completed and signed at the time the scholar enrolls in the grant-supported training. Grant project directors usually present information about their programs and explain the agreement during their program orientations. Therefore, project directors generally conduct these sessions in groups rather than individually. These sessions require 15 minutes for grantees to complete the Pre-Scholarship Agreement. After completed by the grantee, the scholar will then review and sign the agreement, described in the Scholar: Pre-Scholarship Agreement section below.

Our estimate is based on the assumption that grantees meet with scholars in groups of six to explain the agreement, answer questions, and complete and sign the agreement with

the scholars. Because the agreement is only completed prior to the start of training, grantees primarily conduct this activity in the first and second years of their grant. Our estimate, based on an average of FY2014-FY2017 grantees, is that 55 grant awards being made in each fiscal year with an average of 24 total scholars enrolled in each grant over the course of the first two years of the grant. As a result, we estimate that 110 grants need to conduct this activity annually with an average of 12 scholars per grant, or approximately 2 times per year.

#### *Grantees: Exit Certification*

The Exit Certification is completed only once per scholar per grant. The exit certifications are completed and signed when a scholar completes the grant training program or exits prior to completion. Grant project directors complete these agreements one-on-one with the scholars, and it takes approximately 15 minutes for the grantee to review, complete, and sign the agreement. After completed by the grantee, the scholar will then review and sign the agreement, described in the Scholar: Exit Certification section below.

There are currently 345 active grants that have enrolled scholars who will eventually exit. We averaged the number of scholars who completed or exited prior to completion from FY 2014-FY 2017, to determine the appropriate number of completers, approximately 4 scholars per grant.

#### *Scholars: Scholar Training and Employment Record*

Scholars can log into the system and begin to verify and update their contact and training information as soon as they are enrolled in the program and submitted by the grantee in the system. Per program regulations, scholars may begin fulfilling their service obligation through eligible employment after they have completed one full-time academic year of the program. The number of scholars entering data in any given project year will vary but may be as many as 10,841 scholars across all grants. There are currently 10,841 submitted scholars in the database who have yet to fulfill their service obligation. We anticipate that scholar burden will average 15 minutes per year.

#### *Scholars: Pre-Scholarship Agreement*

The Pre-Scholarship Agreement is completed and signed only once per scholar per grant. After completed by the grantee, as noted above under the Grantee: Exit Certification section, we estimate it will take 15 minutes for the scholar to review, discuss, complete, and sign the Pre-Scholarship Agreement. These agreements are completed when the scholars begin their programs. We estimate that roughly 12 scholars per grant or 1,320 scholars across 110 grants, will conduct this activity annually. Our estimate is based on 55 grant awards being made in each fiscal year and an average of 24 new scholars enrolled in each grant over the course of the first two years of the grant.

#### *Scholars: Exit Certification*

The Exit Certification is completed only once per scholar per grant. After completed by the grantee, as noted above under the Grantee: Exit Certification section, we estimate that it will take 15 minutes for each scholar to review, discuss, complete, and sign the Exit Certification. To calculate the annual number of scholars who would need to complete the Exit Certification, we averaged the number of scholars who completed or exited prior to completion from FY 2014- FY 2017, approximately 4 scholars per grant, or 1,380 scholars across 345 active grants.

*Employers: Employment Verification Record*

For employers, the scholar initiates employment verification annually. The estimate assumes the maximum amount of burden, all 10,841 scholars submitting employment annually. 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 provide verification may be substantially lower than the number of scholars that completed one academic year of the PDP training grants. We anticipate the employers' burden to be 10 minutes per scholar per year.

Table A-1. Maximum Annual Burden Estimates, by Data Source

Information Collection (Respondent)	Estimated Number of Respondents	Estimated Number of Responses per Respondent	Estimated Number of Total Responses	Estimated Annual Burden per Respondent	Estimated Annual Burden	Estimated Respondent Average Hourly Wage	Estimated Total Annual Cost
				(in Hours)	(in Hours)	(in Dollars)	(in Dollars)
Complete Scholar Record (Grantee)	345	24	8280	0.33	2732.4	\$50	\$136,620
Complete Pre-Scholarship Agreement (Grantee)	110	2	220	0.25	55	\$50	\$2,750
Complete Exit Certification (Grantee)	345	4	1380	0.25	345	\$50	\$17,250
Update Scholar Training and Employment Record (Scholar)	10841	1	10841	0.25	2710.25	\$25	\$67,756
Complete Pre-Scholarship Agreement (Scholar)	1320	1	1320	0.25	330	\$25	\$8,250
Complete Exit	1380	1	1380	0.25	345	\$25	\$8,625

<b>Certification (Scholar)</b>							
<b>Employment Verification Record (Employer)<sup>1</sup></b>	<b>10841</b>	<b>1</b>	<b>10841</b>	<b>0.167</b>	<b>1810.45</b>	<b>\$50</b>	<b>\$90,522</b>
<b>Totals</b>	<b>25182</b>		<b>34262</b>		<b>8328</b>		<b>\$331,774</b>

<sup>1</sup>Assumes that all scholars are employed.

**Question 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.

**Question 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

<b>Type of Cost</b>	<b>Cost</b>
OSEP Staff (salaries)	\$139,512.5
Contractor Data and Reporting Services (Fixed price)	\$811,883.44
<b>Total</b>	<b>\$ 951,395</b>

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 \$811,883.44 for Option Year 2 (July 1, 2019 – June 30, 2020). 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, in 2020, ranges from \$121,316 to \$157,709 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.

**Question 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 2,984.90 annual burden hours and an adjustment decrease of 261 responses.

The number of annual burden hours has been reduced significantly due to improved collection instructions, consolidation and alignment of data collection options with established statutory terminology, a more accurate burden estimate as well as a reduction in scholar respondents. These collection adjustments will improve the accuracy of the data collected, reduce the burden required from respondents, and improve data use for program staff and the general public.

The slight decrease in the number of responses 2017 (261 responses) is the result of a large change in the response estimation process. Previously, in 2017, grantee responses were reported in aggregate, listing only one response per information collection, rather than listing the true number of responses provided by a single respondent.

For example, in 2017, only one response was reported for a grantee completing a scholar record for 22 scholars annually, which took a total estimated 9 hours. This resulted in 348 responses, one for each grantee, taking 9 hours each, equaling 3,132 hours of burden. In this 2020 request we have clarified the specific number of times the grantee is required to

complete the scholar record for each scholar. Each grantee completed the scholar record 24 times, requiring 20 minutes to complete each submission. This resulted in 8,280 responses, one for each grantee, and a total of 2,732.4 hours of burden.

The number of respondents decreased from previous years due to a reduction of older scholars that completed data reporting activities within the system in recent years, resulting in a reduction of active users. The number of active scholars in 2017 was reported as 15,213 compared to 10,841 scholars in 2020. A significant portion of these scholars were from older closed grants, imported from a previous data collection system. This substantial decrease in scholars also reduced the number of employers within the system, further decreasing the number of respondents.

**Question 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 data will also be used on an annual basis to report results to ED’s Budget Service for compliance with GPRA and publication in ED’s Budget Justification. A final report will be produced for each fiscal year. This 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. The final report will also include analyses of relationships among variables in the current fiscal year data set as well as comparative analyses of key variables across all data sets. 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-3 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-3. Data Collection and Reporting Timeline

Task	Month(s)
Respondents enter data	Ongoing
Snapshot taken of data	April
Draft reports for previous FY	June-July
GPRA reporting for previous FY	July-August
Final report for previous FY	September

OMB No. 1820-0686  
Expiration: TBD

**Question 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.

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

There are no exceptions to the certification statement.