
2010-2011 Terms of Clearance Transcript:

This collection is approved with the following terms of clearance. Upon re-evaluation of the Department's current methodology in assessing burden imposed by the public, the Department acknowledges that the burden estimate as submitted to OMB for the FAFSA application did not include the time required to complete some ancillary processes required in order to accurately complete the application. As required under 5 CFR 1320, agencies are to include in their burden estimates, an estimate for the total annual reporting and recordkeeping burden that will result from the collection of information. As a result, the Department of Education has adjusted its estimate of the burden by including the time devoted to activities such as preparation, submission, and record-keeping.

It is important to note that the higher burden estimate does not reflect an actual increase in burden, but rather a more accurate estimate of the burden associated with the FAFSA application process. It is also important to recognize the Department's tremendous efforts in burden reduction through the use of web enhancements such as skip logic and pre-population of IRS data. These efforts are reflected in the significant program change reduction due to agency discretion.

Notice of Office of Management and Budget Action**Date 12/24/2009**

Given the plans submitted by the Department to better assess burden in its 2010-2011 FAFSA submission to OMB, FSA must further re-evaluate their burden estimates before seeking OMB approval for the 2011-2012 FAFSA application. In order to do so, FSA will do the following:

- Using the 2010-2011 FOTW application, they will monitor application completion time. The completion timer will start at the Introduction page (after successful login) through submission of the application. The time will not include timeouts by applicant and will be rolled back to last completed action. (FSA) will receive a weekly report of completion average by applicant type (dependent and independent students) and type of FAFSA completed (FOTW, FAFSA EZ and pre-filled FOTW).
 - In addition to analysis of the 2010-2011, FSA will use existing approved customer satisfaction survey questions and consider adding additional questions pertaining to preparation time (gathering documents, reading instructions, etc).
 - FSA will also evaluate whether or not to conduct additional studies (usability testing and customer satisfaction) to accurately assess estimates of burden. Options include but not limited to:
 - Review of comparative analyses of the methodologies used by other
 - Federal agencies that are similar in complexity and uses.
 - Student/applicant focus groups
 - Financial aid administrator focus groups
 - Usability studies
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Terms of Clearance Response:

The updated estimates included in the 2011-2012 burden calculations are the result of the Department's efforts to more accurately determine the public's burden as it relates to the application process for federal student aid.

The findings have led to the development of the Applicant Burden Model (ABM), which measures applicant burden through an assessment of the activities each applicant conducts in conjunction with other applicant characteristics. The ABM has been designed to more accurately describe, in terms of burden, the average applicant's experience. Key determinants of the ABM include data derived from -

- A web trending tool that monitors applicant completion time. The completion timer tracks the average time a user spends completing the application and provides the information using the same application breakdown described in the collection.
- FOTW survey information that collects applicant perception on preparation time involved in the application process.
- Other Department data sources that provide information on how the applicant chooses to complete and submit the FAFSA, submit any corrections, and the type of SAR the applicant receives.

The department also conducted financial aid administrator focus groups aimed at assessing perceptions on the burden associated with that specific experience and also reviewed data from recently conducted student usability studies that focused on the FAFSA corrections experience.

Although with this year's reevaluation, the Department has made significant advancement in providing an accurate assessment of the public burden, the Department also plans to continue to identify additional areas where the public burden can be better evaluated. For example, beginning in January 2011, we will begin to receive specific data on an applicant's completion time when making corrections, in addition to the data we currently receive on initial application submission.

In the future, we will continue to work to identify additional areas that can be tracked to support more accurate burden assessments.