

Supporting Statement

Guaranty Agency Financial Report ED Form 2000

1. The Department of Education (ED) is submitting for approval the Guaranty Agency Financial Report

The Guaranty Agency Financial Report is used by a guaranty agency to request payments of reinsurance for defaulted student loans; make payments for amounts due ED, for collections on default and lender of last resort loan (default) claims on which reinsurance has been paid and for refunding amounts previously paid for reinsurance claims. The form is also used to determine required reserve levels for agencies; and to collect debt information as required for the "Report on Accounts and Loans Receivable Due from the Public," SF 220-9 (Schedule 9 Report) as required by the U.S. Department of Treasury.

The legal authority for collecting this information is Title IV, Part B of the Higher Education Act of 1965; Sec. 428 as amended and 34CFR 682 Subpart D.

2. The Guaranty Agency Financial Report is completed via two submissions: one contains payment/collection information (and other transactions affecting the federal receivable and posted to the general ledger), the other contains fund balances (and other transactions related to program oversight). Participating guaranty agencies are required to submit the report on a monthly basis. ED uses the information collected to carry out financial activities between each guaranty agency and ED. The data collected is used for ED's accounting transactions, posting to the general ledger, preparing financial statements, create payment file for Treasury to make payments and complies with the CFO Act. In addition, this information is used in program planning, program oversight, accounting, budgeting, and evaluation. If the information were not collected, ED would not be able to make payments to, or collect monies from Guaranty agencies as required by law.
3. The data is submitted to the Financial Management System (FMS) via on-line data entry, file transfer process (FTP), or email.
4. Most of the information collected here is not available elsewhere in the format needed to pay the agencies' claims. Information collected will be compared to data collected in the National Student Loan Data System (NSLDS) to reduce duplication of data reported by the agencies.
5. Collection of this information does not involve small business.

6. If the collection of this information were conducted less frequently, it would delay payments mandated by law and adversely affect the cash flow of the guaranty agencies. Less frequent submission of collections would result in financial loss to the Federal Government.
7. There are no special circumstances. The collection of this information will be conducted in accordance with the guidelines in 5 CFR 1320.6.
8. ED has been in partnership with the guaranty agency community in development of the Guaranty Agency Financial Report form and instructions. No consultation was made with the workgroup regarding the Form 2000 because there were no changes made to the form.

The 60-day Federal Register Notice was published in Vol.76 page 79665 on 12/22/2011. To date, no comments have been received.

9. There are no plans to provide any payment or gift to respondents.
10. No assurance of confidentiality has been provided to respondents. The information collected here is available to the public under the Privacy Act of 1974 and the Freedom of Information Act.
11. There are no questions of a sensitive or private nature in this information collection activity.
12. The total annual burden has been determined to be approximately 43,560 hours. This was determined by multiplying the estimated number of annual respondents (33) times the number of responses per respondent (24) times the amount of time needed to collect, complete and review the information for accuracy (55 hours).

| | |
|------------------------|-------------|
| Number of Respondents | 33 |
| Frequency of Response | <u>x 24</u> |
| Total Annual Responses | 792 |
| | |
| Hours per response | <u>x 55</u> |
| Total Burden Hours | 43,560 |

The estimated cost to the public will be approximately \$159,720. This was determined by multiplying the number of respondents (33) times the amount of time it takes to collect, complete, review, submit, and maintain the forms (55 hours), times an average hourly wage of \$88 per hour.

13. There is no additional annual cost burden to respondents or record keepers resulting from the collection of information.

14. This form will be processed by an ED contractor. It is estimated that the annual cost to the Federal Government of operating the computer system will be \$884,152.25
15. ED is citing total burden hours of 43,560. This is an increase of 600 hours. The increase is considered an overall adjustment. Although there are 2 fewer respondents, there is a reduction in the number of responses since there is no longer an annual report. This elimination of the annual report should have been included in the change sheet for the previous collection. There is also an adjustment in the number of hours to complete the report going from 50 hours back to the 55 hours of the last submission. When the collection was last approved, the change worksheet submitted in November 2009 mistakenly indicated 50 burden hours. The correct number of hours to complete this report is 55 hours.
16. ED does not plan to publish for statistical use the results of the information being collected. Management reports, however, will be prepared.
17. The expiration date for OMB approval of the information collection will be displayed.
18. The collection of information complies with 5 CFR 1320.9.

B. Collections of Information Employing Statistical Methods

None.