

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
FSA Feedback System**

A. Justification

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 section¹. 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.

This is a request for extension of the current information collection of the FSA Feedback System, OMB Control 1845-0141. On March 10, 2015, the White House issued a [Student Aid Bill of Rights](#). Among the objectives identified was the creation of a centralized complaint system that is now resident and supported via the Federal Student Aid/Customer Engagement Management System. The purpose of the Customer Engagement Management System (CEMS) is to meet the following objective:

“Create a Responsive Student Feedback System: The Secretary of Education created a new web site in July, 2016, to give students and borrowers a simple and straightforward way to file complaints and provide feedback about federal student loan lenders, servicers, collections agencies, and institutions of higher education. Students and borrowers will be able to ensure that their complaints will be directed to the right party for timely resolution, and the Department of Education (the Department) will be able to more quickly respond to issues and strengthen its efforts to protect the integrity of the student financial aid programs.” The Department charged Federal Student Aid (FSA) with the development, implementation and oversight of this collection via the deployed production system.

The Department, and FSA possessed the need to acquire a customer relationship management systems support solution to enable varied FSA business operations (e.g. Feedback & Dispute Management System, Borrower Defense, Risk/OIG Fraud Management, Awareness & Outreach, and other smaller business deliveries) to co-exist in a customer engagement solution. That solution enables customer contacts tracking, and information sharing solutions that exist in a singular, centralized data management structure for customer management efficiencies, costs control, and detailed customer–engagement activities and history collection to resolve customer issues; to inform ongoing business decisions concerning FSA products, services, and where needed, to inform on existing, or in-progress education policies/decisions. In FY2016, FSA embarked on meeting this need through the acquisition of software as a service (SaaS) solution, coupled with a platform as a service (PaaS) coding solution to deliver the required business support outcomes. The acquisition outcome became the

¹ Please limit pasted text to no longer than 3 paragraphs.

implementation of the Salesforce/SaaS & PaaS (with Community of Practice) Service Modules. The software comprised the necessary components to enable the design, development, and production delivery of a supporting business model infrastructure to meet all of our near-term customer engagement strategy needs. That supporting business service platform (inclusive of omni-channel communication support service modules; Contact Center service schemas for customers, support licensing, and operations and maintenance (O&M) support) is the CEMS which utilizes the core SaaS/PaaS infrastructure to enable the FSA business support solutions (such as Feedback & Dispute Management), and all other serviced business applications built and deployed within the CEMS model infrastructure.

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.

The information is used by the Department and its partners to review, respond to, forward to outside entities as needed, and resolve complaints, allegations of suspicious activity, as well as other comments and compliments submitted by customers regarding their Federal financial aid experience. The information is also analyzed to inform operational enhancements and policy decision-making.

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.

The complaint system allows customers to submit complaints to the Department via an electronic web form supported through chat functionality, or by phone. The same information will be collected regardless of the method the customer uses. The planned user interface minimizes the burden to the customer and maximizes ease of use of submitting information.

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.

This system is working to be the single contact or system for the receipt of these types of student/borrower complaints to Federal Student Aid. However, separate businesses units in FSA continue to handle some types of complaints on an ad-hoc basis and there is limited cross checks for duplication of effort. The complaint system will continue to work to replace other processes.

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.

No small entities are affected by this collection.

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.

If the collection is not conducted, the directive mandated by the President's Student Aid Bill of Rights cannot be met. By instituting this centralized complaint system, the Department and FSA will have a better opportunity to interact with the affected public and coordinate and track responses from our partners and servicers.

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 attached to this information collection. As this is a voluntary use system, it is left to the discretion of the customer as to how many complaints, comments, or suspicious activity details to submit per year. There is no limit to the number of submissions that a customer may provide.

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.

The Department is requesting a 30-day public comment review period for this information collection regarding the burden assessment. The Federal Register published on December 7, 2018 notified the public of the 60 day comment period regarding this information collection. The responses to 4 substantive comments are attached. There has been no change to the burden based on these comments.

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

No payments or gifts will be provided to respondents.

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.² 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.

PII is collected and the Privacy Act statement is included on the website at studentaid.ed.gov.

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.

No data of a sensitive nature outside of the Privacy Act statement are being collected.

² 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, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

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.

The Department continues to estimate that monthly rates for submissions by individuals will average 3,600 for an annual total average of 43,200 complaints (3,600 x 12 months = 43,200). It is anticipated that complainants will take an average of ten minutes (.17 hours) to complete the complaint form. The annual burden to individuals is estimated at 7,344 hours yearly (43,200 respondents x .17 hours = 7,344 hours).

Submission of complaints, compliments, and suspicious activity is entirely voluntary.

<i>Affected Party</i>	<i># of Respondents</i>	<i># of Responses</i>	<i># of Burden Hours</i>
<i>Individual</i>	<i>43,200</i>	<i>43,200 X .17 hours =</i>	<i>7,344</i>

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	:	0
Total Annual Costs (O&M)	:	<u>\$0</u>
Total Annualized Costs Requested	:	\$0

There are no estimated costs to respondents.

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.

Software licensing: \$7,050,000

Operations and maintenance: \$7,774,393

Contractor support: Included in software and operations and maintenance

For a total of \$14,824,393 costs to the federal government for the complete CEMS platform.

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).

This is a request for an extension of the current information collection. The continued use of the centralized complaint system is based on the requirement of the Student Bill of

Rights and Departmental needs. There is no anticipated change in the estimated annual system use of approximately 43,200 or burden of 7,344 hours.

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.

Some data regarding complaints will be aggregated and published in an annual report on complaint data, publication of which is mandated by the President's Student Aid Bill of Rights. The scheduled annual publication is the month of October.

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.

The Department is not seeking this approval for this information collection.

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

The Department is not requesting any exceptions.