

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
FSA Payment Vehicle Account (PVA) Program Pilot
Institution Application Questionnaire and Early Pilot Progress Questionnaire

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.

The Department of Education (Department) is requesting a new information collection to be used to obtain information from institutions of higher education (IHEs) that participate in the student financial assistance programs under title IV of the Higher Education Act of 1965, as amended (the HEA). This information collection will be used to invite IHEs to complete an application questionnaire to participate in Federal Student Aid's (FSA) Next Generation Financial Services Environment—Payment Vehicle Account (PVA) program pilot as well as a follow-on questionnaire used to ask pilot progress questions to gauge early pilot progress.

The PVA program pilot is designed to: Provide a no-fee Payment Vehicle Account to participating customers; streamline the IHEs' processing of credit balance funds for title IV Federal student aid and other student aid; and kick-start and continuously promote the interaction between FSA and its customers via FSA's myStudentAid Mobile App, which will bring into greater focus that the Federal Government, through FSA, is the originating source of the student's Federal student aid. Increased, repeat, and positive interactions with FSA and the customer may help to establish a stronger relationship and in turn help ensure that FSA is the first place customers turn to for information about their Federal student aid.

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 Department will collect the information in the attached instruments from the IHE. The responses to the information collection instrument will be submitted electronically. The information collected from the "Institution Application Questionnaire" will be used by the Department to make an informed selection of participants for the PVA pilot. The

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

information collected from the “Institution Early Pilot Progress Questionnaire” will be used by the Department to gauge early pilot progress.

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 Department will permit and encourage the IHEs to submit its responses to this collection electronically through the FSAPaymentVehicle@ed.gov mailbox. Electronic information submission presents a minimal burden on the IHEs and will streamline the collection process.

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.

The Department does not already maintain the data requested in the “Institution Application Questionnaire” regarding credit balance refunds issued by IHEs. Although the Department does require IHEs to report information regarding their tier 1 and tier 2 relationships under cash management regulations, that data may be incomplete. As it is relevant to making the institution pilot location selection determination, it is necessary to ask IHEs two questions related to tier 1 and tier 2 to ensure the Department has the accurate data to make an informed selection. However, to the extent that the Department already has an IHE’s enrollment size, location, institutional structure, and other general information, an IHE will not be required to submit it again. Furthermore, the Department does not already maintain the data requested in the “Institution Early Pilot Progress Questionnaire.”

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 businesses are impacted 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.

This is a collection to assist the Department in selecting participating IHEs for the PVA program pilot. In order to have sufficient and specific information to make an informed

selection of participants in that pilot, the Department needs to gather the information outlined in this instrument.

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.

This information collection does not involve any of the above conditions.

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 is a request for clearance of the new information collection to gather information from IHEs to determine eligibility to participate in the PVA Pilot Program and to clear follow-on early pilot progress questions. No comments were received during the 60-day public comment period that results in a change to the questions or burden estimates. The

Department asks that a request be sent to the Federal Register for 30-day public comment period in order to allow for full public comment on the process.

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

There will be no payments, gifts or remuneration provided to respondents of the information collection request.

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.

No personally identifiable information is being collected, so no assurance of confidentiality is necessary.

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.

This collection instrument does not pose questions of a private or sensitive nature.

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

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)

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 estimates an average of 15 hours per respondent to complete the series of questions from the “Institution Application Questionnaire.” This includes the time needed to review the questions and prepare comprehensive responses. The Department anticipates that a total of 200 IHEs may express an interest in participating in this initiative for a total of 3,000 hours of burden (200 x 15 hrs. = 3,000).

	Respondents	Responses		Burden Hours
Public Institution	94	94	x 15 =	1,410
Private Institution	80	80	x 15 =	1,200
For-Profit Institution	<u>26</u>	<u>26</u>	<u>x 15 =</u>	<u>390</u>
TOTAL	200	200		3,000

The Department estimates the cost of completion of the collection instrument to be \$133,230. This is based on an average institutional staff cost of \$44.41 per hour multiplied by the estimated 3,000 burden hours.

The Department estimates an average of 20 hours per respondent to complete the series of questions from the “Institution Early Pilot Progress Questionnaire.” This includes the time needed to review the questions and prepare comprehensive responses. The Department estimates that a total of 10 IHEs may be asked to respond to the questionnaire on a quarterly basis, if selected to be pilot site locations, for a total of 200 hours of burden (20 IHEs x 10 hours x 4 quarters = 200).

	Respondents	Responses		Burden Hours
Public Institution	5	5 x 20	x 4 =	400
Private Institution	4	4 x 20	x 4 =	320
For-Profit Institution	<u>1</u>	<u>1 x 20</u>	<u>x 4 =</u>	<u>80</u>
TOTAL	10	10		800

The Department estimates the cost of completion of the collection instrument to be \$35,528. This is based on an average institutional staff cost of \$44.41 per hour multiplied by the estimated 800 burden hours.

The Department estimates a combined total of 3,800 hours of burden (3,000 hrs. + 800 hrs.) for both questionnaires. The Department estimates the combined total cost of completion of both collection instruments to be \$168,758. This is based on an average institutional staff cost of \$44.41 per hour multiplied by the estimated 3,800 burden hours.

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:

Total Annual Costs (O&M): _____

Total Annualized Costs Requested:

There are no additional cost burdens associated with this collection other than those listed in item 12.

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.

There is no additional cost to the Federal government.

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 program change based on implementation of a pilot program. It is a new collection. The Department estimates an anticipated combined 2,000 respondents requiring a combined estimated total burden of 3,800 hours for the pilot project application and quarterly reporting of the selected institutions. The increase in burden is due to a new collection.

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 information collected from the "Institution Application Questionnaire" may be relayed in aggregate form. However, there are no current plans of publishing the information collected from the "Institution Early Pilot Progress Questionnaire" in a tabulated format or as a whole.

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 will display collection approval and expiration date for OMB approval on the application.

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

There are no exceptions to the certification statement identified in the Certification of Paperwork Reduction Act.