

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

Federal Student Aid User Experience Design Research Generic Clearance

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 section. Please limit pasted text to no longer than 3 pages. 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.

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. In order to work continuously to ensure that our programs are effective and meet our customers' needs, the Department of Education's Office of Federal Student Aid (FSA) seeks to obtain OMB approval of a Fast Track Process (5-day) generic clearance to collect qualitative feedback for the Next Generation Financial Services Environment (Next Gen). The Next Gen initiative is a comprehensive, FSA-branded customer engagement layer that will create an environment where the Department's customers will receive clear, consistent information and readily accessible self-service options at every stage of the student aid lifecycle.

This collection of information is necessary to enable FSA to garner customer and stakeholder qualitative feedback in an efficient, timely manner, in accordance with our commitment to improving service and information delivery. By qualitative feedback we mean information that provides useful insights on perceptions and opinions but are not statistical surveys that yield quantitative results that can be generalized to the population of study. The insights collected from our customers and stakeholders will help ensure that users have a consistent, efficient, and satisfying experience with FSA's programs. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of issues with customer care and communications, or focus attention on areas where technology, design, or changes in training might improve self-service delivery and distribution of information. These collections will allow for ongoing, collaborative and actionable communications between FSA and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program delivery.

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.

Improving FSA's customer engagement requires ongoing assessment and creation of an enterprise-wide, FSA-branded digital platform, an omni-channel customer care experience across phone, chat, chatbot, email, text, and social channels, and consistent and personalized information delivered through customers' preferred communication channels. This all contributes to the continuous improvement of the Next Gen environment. FSA will collect, analyze, and interpret information

gathered through this generic clearance to identify strengths and weaknesses of current service delivery and make improvements based on feedback. The solicitation of feedback will target areas such as: consistency, personalization, intuitiveness, accessibility, ease of use, proactive communication, and efficiency. The collection of this information will allow FSA to deliver clear, consistent information and readily accessible self-service options at every stage of the student aid lifecycle.

FSA will only submit a collection for approval under this generic clearance if it meets the following conditions:

- Information gathered will be used only internally for general service improvement and program management purposes and is not intended for release outside of FSA (if released, procedures outlined in Question 16 will be followed);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions ¹;
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study;
- The collections are voluntary;
- The collections are low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and are low-cost for both the respondents and the Federal Government;
- The collections are non-controversial and do not raise issues of concern to other Federal agencies;
- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future; and
- With the exception of information needed to provide remuneration for participants of usability testing and other human-centered design methods, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

If these conditions are not met, FSA will submit an information collection request to OMB for approval through the normal PRA process.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation. The submission will have automatic approval, unless OMB identifies issues within 5 business days.

The types of collections that this generic clearance covers include, but are not limited to:

- Small discussion groups
- Stakeholder and user interviews
- Contextual inquiry
- Usability testing and other human-centered design methods, including card sorting, dot voting, preference testing, and sentiment analysis
- A/B and multivariate testing
- Qualitative customer satisfaction surveys and feedback (e.g., post-transaction surveys; opt-out web surveys; up/down voting of content and communications; general feedback & comments solicitation)

¹ As defined in OMB and agency Information Quality Guidelines, “influential” means that “an agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions.”

FSA has established a manager/managing entity to serve for this generic clearance and will conduct an independent review of each information collection to ensure compliance with the terms of this clearance prior to submitting each collection to OMB.

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.

When appropriate, FSA will collect information electronically and/or use online collaboration tools such as Skype, dScout, and Treejack to reduce burden.

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 Question 2 above.

No similar data are gathered or maintained by FSA or are available from other sources known to FSA.

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.

Small business or other small entities are unlikely be involved in these efforts, and FSA will minimize the burden on those that are involved with information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

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.

Without these types of feedback, FSA will not have timely information to adjust its services to meet customer needs. Direct user feedback is essential to delivering clear, consistent, and effective information and readily accessible self-service options throughout the student aid lifecycle.

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.

In all cases the information collected will be voluntary and will not be used for statistical purposes. Therefore there are no special circumstances.

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.

A Federal Register Notice seeking public comment on the proposed burden was published on November 4, 2019 (Vol. 84, No 213, page 59364). One comment was received. The commenter voiced appreciation for the Next Generation Financial Services Environment as a whole but expressed concerns about cybersecurity integrity especially in regard to the Free Application for Federal Student Aid (FAFSA). Specifically, he commented on the focus on the level of personalization for evaluation or development and felt that the primary focus of development should be functionality and data security.

FSA appreciates the commenters concerns. This collection will include research and usability testing both for FAFSA digital products, as well as all digital customer care (DCC) features such as the studentaid.gov website, FSA ID, and more. These features are relevant across the entire student aid

lifecycle, and we therefore believe the personalization is warranted as a human-centered design principle. However, FSA is very focused on security, with regular security audits being a part of every design and release cycle, and will not be improving personalization at the expense of security. We will also take the comment back to the mobile app team for their review and consideration.

FSA is now requesting a 30-day Federal Register Notices seeking public comment on the proposed burden. This is that 30-day request.

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

FSA will not provide payment or other forms of remuneration to respondents of its various post-transaction surveys, opt-out web surveys, up/down voting of content and communications, or general feedback & comments solicitation.

In the case of usability testing and other human-centered design methods (e.g. tree testing, card sorting, contextual inquiry, etc.), the contractor may provide stipends of up to \$75 for sessions lasting over one hour, when such information collections include hard-to-reach groups such as defaulted and delinquent borrowers and non-traditional student groups such as single parents. In all cases of compensation OMB will be provide with justifications in the request for clearance of these specific activities.

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 ICRAS' Part 2 IC form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided. 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). 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.

If a confidentiality pledge is deemed useful and feasible, FSA will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If FSA includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

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 questions will be asked that are of a personal 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 Question 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. (The table should at minimum include Respondent types, Number of Respondents 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 Question 14.

The annual number of burden and individual responses is provided in the table below.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Annual Hours
General solicitations and web feedback forms	249,900	Once	.25 hours	62,475
Discussion groups, stakeholder and user interviews, and contextual inquiry	500	Once	1 hour	500
Usability testing and other design methods	12,000	Once	1 hour	12,000
Totals:	262,400			74,975

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 Questions 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 Question 12.

Total Annualized Capital/Startup Cost:

Total Annual Costs (O&M):

Total Annualized Costs Requested:

No costs are anticipated for record keepers or 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 Questions 12, 13, and 14 in a single table.

There is no anticipated additional cost to the Federal Government outside of the Next Gen contract awards. These contracts, including the Digital and Customer Care contract, include time to read and evaluate surveys, as well as for staffing of usability testing and other design activities, software licenses, and other minimal operational costs. Potential compensation for respondents is at contractor discretion within the contract structures under Next Gen and within all guidelines and limitations set out by OIRA and the Paperwork Reduction Act, and are not incurred to FSA or respondents.

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 new information collection request. FSA anticipate 262,400 annual respondents and responses for an estimated 74,975 burden 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.

Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population. Findings will be used for general service environment improvement, but are not for publication or other public release.

Although FSA does not intend to publish its findings, FSA may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). FSA will disseminate the findings when appropriate, strictly following FSA's "Guidelines for Ensuring the Quality of Information Disseminated to the Public", and will include specific discussion of the limitation of the qualitative results discussed above.

17. 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.

We are requesting no exemption.

18. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

These activities comply with the requirements in 5 CFR 1320.9.

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

There are no exceptions.