

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. 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, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

The Higher Education Act of 1965, as amended (the HEA) established the William D. Ford Federal Direct Loan (Direct Loan) Program under Title IV, Part D and the Federal Family Education Loan (FFEL) Program under Title IV, Part B, and the Federal Perkins Loan (Perkins Loan) Program under Title IV, Part E. Section 455(a)(1) of the HEA provides that unless otherwise specified, Direct Loan Program loans are subject to the same terms and conditions as loans made under the Federal Family Education Loan (FFEL) Program. Sections 428(b)(1)(M) and 428B(d)(1) of the HEA provide that FFEL Program borrowers who meet certain eligibility requirements may temporarily defer (postpone) repayment of their loans. In accordance with §455(a)(1), these same deferment options are available to Direct Loan Program borrowers. In addition, these deferments are available to borrowers in the Perkins Loan Program under 34 CFR 674.34, 674.35, 674.36, and 674.37.

With the exception of in-school deferments (see Item 3 below), the applicable regulations require a borrower to request a deferment from the U.S. Department of Education (the Department) and, in most cases, to provide additional information or a certification from a third party that establishes the borrower's eligibility for the deferment.

This collection includes six separate deferment request forms that serve as the means for a borrower to request a deferment and provides the necessary information and/or certifications to establish his or her eligibility for the deferment.

The six deferment request forms are:

1. Rehabilitation Training Deferment Request – RHT. Used by borrowers to request a deferment while they are engaged in a rehabilitation training program.
2. Graduate Fellowship Deferment Request – GFL. Used by borrowers to request a deferment while they are engaged in a graduate fellowship program.
3. In-School Deferment Request – SCH. Used by borrowers to request a deferment while they are enrolled at least half time at an eligible institution, and by certain parent Direct PLUS Loan borrowers to request a deferment while the student for whom they obtained a Direct PLUS Loan is enrolled at least half time.

4. Economic Hardship Deferment Request – HRD. Used by borrowers to request a deferment while they are experiencing an economic hardship.
5. Unemployment Deferment Request – UNEM. Used by borrowers to request a deferment while they are seeking but unable to find employment.
6. PLUS Deferment Request – PLUS. Used by PLUS borrowers to request a deferment while the student on whose behalf the parent borrowed is in-school..

NOTE: Some of the deferments listed above are available only to borrowers who borrowed Direct Loan, FFEL Program, or Federal Perkins Loan as of a specific date. This restriction is explained on the applicable deferment request forms included with this submission.

The Department is requesting an extension of the currently approved collection. We are making no changes to the forms.

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 currently approved deferment request forms are used by borrowers to request deferments on their loans. The forms also collect the information that is required for the loan holder to determine whether the borrower meets the eligibility requirements for the requested deferment. The deferment request forms continue to be used for these purposes.

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. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

The six deferment forms are available electronically to be printed and completed for processing. However, this information collection does not allow the use of electronic submission of requests. Except for certain borrowers requesting unemployment deferments who may qualify for the deferment based on a self-certification of registration with an employment agency, borrowers must either submit supporting documentation to establish their eligibility for a deferment or have a third party (such as a school official) certify their eligibility for the deferment. As a result, electronic submission of most deferment requests is not feasible at this time.

In-school Deferment and PLUS Deferment Requests

Although in most cases a borrower must submit a deferment request with the appropriate documentation to the loan holder, the loan holder may grant an in-school

deferment without a request from the borrower based on information that the Department obtains from other sources confirming that the borrower is enrolled at least half time at an eligible institution. This reduces burden on borrowers. In such cases, the loan holder notifies the borrower that the deferment has been granted and provides the borrower with the option of canceling the deferment and continuing to make payments on his or her loan.

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.

With the exception of the in-school deferment (see Item 3), there is no information already available from other sources that can be used to establish a borrower's eligibility for a deferment.

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 affected by this information 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.

The frequency with which a borrower must request a deferment is determined in accordance with statutory and regulatory requirements that are explained on each deferment request form. Less frequent data collection would not allow loan holders to process borrower requests for deferment and deny borrowers statutory and regulatory relief.

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.**

Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30 day notice, indicate that a notice will be published.

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 considered comments from the public when developing the currently approved forms. On April 16, 2021, a Federal Register Notice was published (Vol. 86, No 72, pages 20131 and 20132) inviting public comment on this information collection. Two comments were received and FSA's responses are attached. No changes were

made to the collection or the forms based on these comments. The Department is now requesting a 30-day public comment period be published in the Federal Register.

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 have been 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.¹ 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 no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.

The forms include a Privacy Act Notice that (1) informs borrowers of the statutory authority for the information collection; (2) explains that the disclosure of the information is voluntary, but is required in order to qualify for a loan discharge; and (3) identifies the third parties to whom the information may be disclosed and explains the circumstances under which those disclosures may occur.

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.

The Economic Hardship Deferment Request asks for income information. This information may be considered sensitive by some individuals, but it is needed to establish the borrower's eligibility for the deferment. The deferment forms do not otherwise request any sensitive information.

¹ 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 for this current information collection request. The statement should:

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **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. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. 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. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

Research has shown that the vast majority of the PLUS and In-School Deferments are properly granted using information provided by the institution through the National Student Loan Data System (NSLDS). The regulations allow for loan holders/servicers to use the enrollment information from NSLDS to automatically apply in-school deferments for student and parent loans. The regulations also require that the holder/servicer contact the borrower to inform them of this action and allow the borrower to refuse the deferment and make payments instead.

The Department files this request with the same total annual number of respondents (683,903) for this renewal collection as was used in the prior filing. Due to the effects of the COVID-19 pandemic and the suspension of the collection of loans, the Department lacks sufficient data to allow for more accurate updates to the usage of these forms. The forms continue to be presented in the simplified and reformatted common layout for these types of requests. There has been no change in the underlying statutes or regulations which support these request forms.

We maintain the estimated response time for each of the six deferment forms is 0.16 hours (10 minutes), with one response per respondent. This equates to a total estimated reporting burden of 109,426 hours. This corrects the total hours from the the previous incorrect filing total of 109,424 which was due to a math error rounding.

The burden estimate for each form remains as follows:

Economic Hardship Deferment Request

Estimated annual number of respondents:	166,766
Number of responses per respondent:	x 1
Hours per response:	x 0.16
Annual hour burden:	26,683

Rehabilitation Training Deferment Request

Estimated annual number of respondents:	366
Number of responses per respondent:	x 1
Hours per response:	x 0.16
Annual hour burden:	59

In-School Deferment Request

Estimated annual number of respondents:	105,598
Number of responses per respondent:	x 1
Hours per response:	x 0.16
Annual hour burden:	16,896

Graduate Fellowship Deferment Request

Estimated annual number of respondents:	4,655
Number of responses per respondent:	x 1
Hours per response:	x 0.16
Annual hour burden:	745

Unemployment Deferment Request

Estimated annual number of respondents:	368,608
Number of responses per respondent:	x 1
Hours per response:	x 0.16
Annual hour burden:	58,977

PLUS Deferment Request

Estimated annual number of respondents:	37,910
Number of responses per respondent:	x 1
Hours per response:	x 0.16
Annual hour burden:	6,066

There are no annual costs to respondents associated with operating or maintaining systems or purchasing services.

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Individual	683,903	683,903	.16	109,426	\$20.17	\$2,207,122
Annualized Totals	683,903	683,903		109,426		\$2,207,122

The costs are based on the May 2020 median wage for all occupations as noted here:

https://www.bls.gov/oes/current/oes_nat.htm#00-0000

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

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 capital/startup 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.**

There is no significant cost to the federal government related to these forms from FFEL Program, Direct Loan, or Perkins Loan borrowers, since loan holders and servicers distribute and process the loan discharge applications, and Department servicers do not specifically charge the government for distributing these forms.

- 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).**

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden			2
Total Responses			

Total Costs (if applicable)			\$39.92
------------------------------------	--	--	---------

This is a request for an extension of the current information collection 1845-0011. The Department is maintaining the burden hours of 109,426 from the previous OMB approved burden. This corrects the total hours from the previous incorrect filing total of 109,424 which was a math error due to rounding; showing a change of 2 hours and cost change of \$39.92. The respondents and responses remain at 683,903 from the previous OMB approved number.

- 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.**

The results of this information collection will not be published.

- 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.

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

The Department is not requesting any exceptions to the "Certification for Paperwork Reduction Act Submissions".