

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Student Assistance General Provisions - Subpart K - Cash Management

- 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 Department of Education (the Department) amended the Student Assistance General Provisions regulations issued under the Higher Education Act of 1965, as amended (HEA), to implement the changes made to the Student Assistance General Provisions regulations – Subpart K – Cash Management §668.164 – Disbursing funds. These regulations are intended to ensure students and parents have convenient access to their Title IV, HEA program funds, do not incur unreasonable and uncommon financial account fees on these title IV funds and are not led to believe that they must open a particular financial account to receive their Federal student aid.

This request is for an extension of the information collection for the requirements that are contained in the regulations §668.164 – Disbursing funds. The regulations require that an institution that makes direct payments to a student or parent by electronic funds transfer (EFT) and that chooses to enter into an arrangement described in 668.164(e) or (f), including an institution that uses a third-party servicer to make those payments, must establish a selection process under which the student chooses one of several options for receiving those Title IV, HEA fund payments. There has been no change to the regulations.

- 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 institutions and students and parents to ensure that all parties are aware of the choices and ramifications of the available options for receiving Title IV credit balances.

Under the regulations an institution must establish a selection process whereby the student chooses one of several options for receiving Title IV credit balances and require certain disclosures regarding arrangements between an institution and a third-party servicer, as well as between an institution and a financial institution for the purpose of paying a Title IV credit balance under 34 CFR 668.164(d)(4).

- 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.

There are no legal or technical obstacles to the use of technology in this information collection activity. It is anticipated that many institutions will provide this information to eligible students through electronic means.

- 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 information is not duplicated on any other information collection.

- 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.**

While most institutions of higher education will provide the required information about third-party servicers and/or financial institutions with whom the institutions of higher education have made arrangements to resolve Title IV credit balances via their campus Web sites, there will be some small institutions that will choose to provide written materials to students and parents and collect their consent via pen and paper. Allowing the use of campus Web sites will mitigate the burden of these disclosures and for the ease of collection of student and parent consent.

- 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 regulation requires the institution to determine which students will receive a credit balance and to the extent that an institution uses a Tier 1(T1) or Tier 2 (T2) arrangement, those arrangements must be disclosed. These disclosures are to emphasize that students can always use any pre-existing bank account in which to deposit their Title IV credit balance rather than opening a new account. The disclosures also provide the student with the terms and conditions information including associated fees that can be assessed with these accounts being offered through the institution.

These disclosures are meant to provide additional consumer information upon which financial decisions can be made.

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 collection is consistent with all of the guidelines in 5 CFR 1320.5(d)(2).

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 regulations were previously developed by the Department through negotiated rulemaking sessions with members of the community. The Department published a 60-day comment notice in the Federal Register on August 13, 2021 (86 FR 44702) inviting public comment on the burden assessment for these regulatory requirements. There were no public comments received related to the notice. A 30-day public comment notice be published in the Federal Register This is the 30-day notice request.

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

There are no payments or gifts 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.

There is no assurance of confidentiality provided to institutions for the submission of this information.

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

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)

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.

There are no questions of a sensitive nature in this collection.

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.**

Section 668.164 - Disbursing funds.

Section 668.164(d)(4): Student choice

Under the regulations, an institution located in a State that makes direct payments to a student by EFT and that chooses to enter into an arrangement described in 668.164(e) or 668.164(f), including an institution that uses a third-party servicer to make those payments, must establish a selection process under which the student chooses one of several options for receiving those payments. The institution must inform the student in writing that he or she is not required to open or obtain a specific financial account or access device offered by or through a specific financial institution. The institution must ensure that the options for receiving direct payments are described and presented in a

clear, fact-based, and neutral manner, except that it must present as the first option, the financial account belonging to the student.

The institution must ensure that initiating the EFT process to a student's existing financial account is as timely as and no more onerous than initiating the EFT process to an account offered pursuant to a T1 or T2 arrangement. The institution must allow the student the option to change at any time his or her account preference using written notice within a reasonable amount of time, ensure that no account is preselected, and that absent making an affirmative selection, the full amount of the credit balance is paid timely.

The institution must list and identify major features and commonly assessed fees associated with all accounts offered pursuant to a T1 or T2 arrangement, as well as provide a Universal Resource Locator (URL) linked to the terms and conditions of those accounts. For each account, if an institution follows the format and content requirements specified by the Secretary in a notice published in the Federal Register, it will be in compliance with these requirements. The format and content are under OMB Control Number 1845-0147.

The Department looked at Title IV participating institutions and aid recipients using data available at studentaid.ed.gov. The Department has estimated the incidence and distribution of credit balance recipients using the same percentages as in the previous collection filing. The following figures will be used throughout this statement.

The numbers of students who received Title IV aid in the 2020-2021 award year based on the unique combined loan and grant recipients was 9,626,376 multiplied by 13 percent provides the estimated number of 1,251,429 students with a credit balance affected by these regulations.

From the data obtained from the [report of T1 and T2 contracts](#) with contracts through July 15, 2021 that were reported to the Department (also available on studentaid.ed.gov) identified a total of 532 institutions unduplicated OPEIDs, not including school branch locations (93 private not-for-profit institutions, 57 proprietary institutions, and 382 public institutions).

AFFECTED ENTITIES and BURDEN:

PRIVATE NOT-FOR-PROFIT INSTITUTIONS:

Of the 532 institutions reporting T1 or T2 contracts to the Department, 93 institutions are private not-for-profit institutions. On average, we estimate the burden associated with developing, implementing and maintaining the student choice options will require burden of 20 hours per institution and therefore we estimate a total burden of 1,860 hours (93 institutions times 20 hours per institution) under OMB Control Number 1845-0106.

PROPRIETARY INSTITUTIONS:

Of the 532 institutions reporting T1 or T2 contracts to the Department, 57 institutions are proprietary institutions. On average, we estimate the burden associated with developing, implementing, and maintaining the student choice options will require burden of 20 hours per institution and therefore we estimate a total burden of 1,140 hours (57 institutions times 20 hours per institution) under OMB Control Number 1845-0106.

PUBLIC INSTITUTIONS:

Of the 532 institutions reporting T1 or T2 contracts to the Department, 382 institutions are public institutions. On average, we estimate the burden associated with developing, implementing, and maintaining the student choice options will require burden of 20 hours per institution and therefore we estimate a total burden of 7,640 hours (382 institutions times 20 hours per institution) under OMB Control Number 1845-0106.

STUDENT CHOICE - INSTITUTIONS

of Respondents: # of Responses: Hrs/Response: # of Burden Hours:

PRIVATE NON-PROFIT INSTITUTIONS:

93 93 X 20 hrs 1,860

PROPRIETARY INSTITUTIONS:

57 57 X 20 hrs 1,140

PUBLIC INSTITUTIONS:

382 382 X 20 hrs 7,640

Total: 532 532 10,640

The Department estimates that 1,251,429 Title IV recipients with credit balances for the 2020-21 award year will be impacted by this regulation. We estimate that each of the affected Title IV recipients will take, on average, 20 minutes (.33 hours) to review the options presented by the institution or their third-party servicer and to make their selection for estimated burden of 412,972 (1,251,429 times .33 hours) under OMB Control Number 1845-0106.

STUDENT CHOICE - TITLE IV RECIPIENTS

of Respondents: # of Responses: Hrs/Response: # of Burden Hours
1,251,429 1,251,429 .33 hrs 412,972

Grand Total for 668.164(d)(4):

of Respondents: # of Responses: Hrs/Response: # of Burden Hours
1,251,961 1,251,961 423,612

Section 668.164(e): Tier 1 (T1) Arrangements

Under the regulations in §668.164(e), a T1 arrangement exists when an institution enters into a contract with a third-party servicer, acting as an intermediary that disburses title IV funds, that performs one or more of the functions associated with processing direct payments of title IV, HEA program funds to students on behalf of the institution to one or more financial accounts that are offered under the contract or by the third-party servicer, or by an entity contracting with or affiliated with the third-party servicer.

AFFECTED ENTITIES and BURDEN:

T1 ARRANGEMENT REQUIREMENTS - INSTITUTIONS

Under these regulations, we expect that institutions with T1 arrangements will have to modify their systems or procedures to ensure compliance with these regulations including to, establish a consent process; provide account terms and conditions disclosures; and provide the disclosures, contract disclosures, and use and cost data after the end of the award year. In addition, it is likely that institutions will make other changes in order to conduct their periodic due diligence and updating of third-party contracts to allow for termination of the contract based upon student complaints or the institution's assessment that third-party fees are excessive.

PRIVATE NOT-FOR-PROFIT INSTITUTIONS: The Department estimates that 45 private not-for-profit institutions are reporting T1 contracts. We estimate that the changes necessitated by the requirements will add an additional 55 hours of burden per institution, increasing burden by 2,475 hours (45 institutions times 55 hours per institution) under OMB Control Number 1845-0106.

PROPRIETARY INSTITUTIONS: The Department estimates that 57 proprietary institutions are reporting T1 contracts. We estimate that the changes necessitated by the requirements will add an additional 55 hours of burden per institution, increasing burden by 3,135 hours (57 institutions times 55 hours per institution) under OMB Control Number 1845-0106.

PUBLIC INSTITUTIONS: The Department estimates that 302 public institutions are reporting T1 contracts. We estimate that the changes necessitated by the requirements will add an additional 55 hours of burden per institution, increasing burden by 16,610 hours (302 institutions times 55 hours per institution) under OMB Control Number 1845-0106.

T1 ARRANGEMENT REQUIREMENTS - INSTITUTIONS

	# of Respondents:	# of Responses:	Hrs/Response:	# of Burden Hours:
PRIVATE NOT-FOR-PROFIT INSTITUTIONS:				
	*	45	X 55 hrs	2,475
PROPRIETARY INSTITUTIONS:				
	*	57	X 55 hrs	3,135
PUBLIC INSTITUTIONS:				
	*	302	X 55 hrs	16,610
Total:	*	404		22,220

*=is used to avoid duplication of the universe of participating institutions

T1 ARRANGEMENT REQUIREMENTS - RECIPIENTS

We estimate that, on average, each recipient will take 15 minutes (.25 hours) to read the about the major features and fees associated with the financial account, information about the monetary and non-monetary remuneration received by the institution for entering into the T1 arrangement, along with the number of students and parents who had financial accounts under the T1 arrangement for the most recent completed year, the mean and median costs incurred by account holders, and determine whether to provide their consent to the institution.

We estimate that 1,063,715 recipients were enrolled in institutions with T1 arrangements. The additional burden on Title IV recipients at these institutions will increase by 265,929 hours (1,063,715 times .25 hours) under OMB Control Number 1845-0106.

T1 ARRANGEMENTS - TITLE IV RECIPIENTS

	# of Respondents:	# of Responses:	Hrs/Response:	# of Burden Hours
Total	*	1,063,715	.25 hrs	265,929

*=is used to avoid duplication of the universe of individuals

Grand Total for 668.164(e):

# of Respondents:	# of Responses	# of Burden Hours
*	1,064,119	288,149

*=is used to avoid duplication of the universe

Section 668.164(f): Tier 2 (T2) Arrangements

Under §668.164(f), a T2 arrangement exists when an institution enters into a contract with a financial institution under which financial accounts, into which Title IV, HEA program funds will be deposited or transferred, are offered and marketed directly to students. The Secretary presumes that Title IV, HEA program funds are deposited or transferred into financial accounts that are offered under a contract between an

institution and a financial institution if students that receive credit balance funds are subject to the direct marketing. However, the institution does not have to comply with the requirements described in paragraphs (d)(4)(i) or (f)(4) of §668.164 if it documents that, for the most recently completed award year no students received a credit balance and does not have to comply with the requirements described in (f)(4)(iii)-(vi) and (f)(4)(viii) of §668.164 if it documents that, for the most recently completed award year, fewer than 500 students received a credit balance.

The Secretary considers that a financial account is marketed directly if the institution communicates information directly to its students about the financial account and how it may be opened; the financial account or access device is co-branded with the institution's name, logo, mascot, or other affiliation and marketed predominantly to students; or a card or tool that is provided to the student for institutional purposes, such as a student ID card, is linked with the financial account or access device.

AFFECTED ENTITIES and BURDEN:

T2 ARRANGEMENT REQUIREMENTS - INSTITUTIONS

Under these regulations, we estimate that an institution with a T2 arrangement will have to modify its systems or procedures to, among other things: establish a consent process; provide account terms and conditions disclosures; ensure compliance with the 30-day prohibition for charges made to an account following the date that title IV, HEA program funds are deposited or transferred into the account; provide the required disclosures, contract disclosures, and use the cost data within 60 days after the end of the award year.. In addition, other changes may be required regarding to how the institution will conduct its periodic due diligence and updating of third-party contracts to allow for termination of the contract based upon student complaints or the institution's assessment that third-party fees have become excessive.

PRIVATE NOT-FOR-PROFIT INSTITUTIONS: The Department estimates that 48 private not-for-profit institutions are reporting T2 contracts. We estimate that the changes required by the regulations will add an additional 45 hours of burden per institution, increasing burden by 2,160 hours (48 times 45 hours) under OMB Control Number 1845-0106.

PROPRIETARY INSTITUTIONS: The Department estimates that 0 proprietary institutions are reporting T2 contracts.

PUBLIC INSTITUTIONS: The Department estimates that 80 public institutions are reporting T2 contracts. We estimate that the changes necessitated by these requirements relating to T2 arrangements will add an additional 45 hours of burden per institution, increasing burden by 3,600 hours (80 times 45 hours) under OMB Control Number 1845-0106.

T2 ARRANGEMENT REQUIREMENTS - INSTITUTIONS

	# of Respondents:	# of Responses:	Hrs/Response:	# of Burden Hours:
PRIVATE NOT-FOR-PROFIT INSTITUTIONS:				
	*	48	X 45 hrs	2,160
PROPRIETARY INSTITUTIONS:				
	*	0	X 45 hrs	0
PUBLIC INSTITUTIONS:				
	*	80	X 45 hrs	3,600
Total:	*	128		5,760

*=is used to avoid duplication of the universe of participating institutions

T2 ARRANGEMENTS – TITLE IV RECIPIENTS

We estimate that, on average, each recipient will take 15 minutes (.25 hours) to read the about the major features and fees associated with the financial account, information about the monetary and non-monetary remuneration received by the institution for entering into the T2 arrangement, along with the number of students and parents who had financial accounts under the T2 arrangement for the most recent completed year, the mean and median costs incurred by account holders, and determine whether to provide their consent to the institution.

Of the estimated total 187,714 Title IV recipients with credit balances at institutions that had a T2 arrangement, we estimate, that on average, each recipient will take 15 minutes (.25 hours) to read the institution's required disclosures and consent information and decide whether to provide consent or not. The additional burden on Title IV recipients will increase by 46,929 hours (187,714 times .25 hours) under OMB Control Number 1845-0106.

T2 ARRANGEMENTS

	# of Respondents:	# of Responses:	# of Burden Hours
Total	*	187,714	46,929
Grand Total for 668.164(f):	*	187,842	52,689

*=is used to avoid duplication of the universe

Tracking and OMB Number: (XX) 1845-0106

Revised: 10/13/2021

TOTAL FOR 1845-0106

	# of Respondents:	# of Responses:	# of Burden Hours
New total based on this extension request	1,251,961	2,503,922	765,450
Previous total:	1,518,591	3,037,182	916,357
Difference for 1845-0106:	-266,630	-533,260	-151,907

We estimate the costs for responding to the estimated burden hours at \$44.41/hour for institutions, and \$16.30/hour for individuals.

Private Institutions	6,495 x \$44.41= \$	288,442.95
Proprietary Institutions	4,275 x \$44.41= \$	189,852.75
Public Institutions	27,850 x \$44.41= \$	1,236,818.50
<u>Individuals</u>	<u>725,830 x \$16.30=</u>	<u>\$11,831,029.00</u>
		\$13,546,143.20

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Individual	1,251,429	2,502,858	725,830	\$16.30	\$11,831,029.00
For-Profit Institution	57	114	4,275	\$44.41	\$189,852.75
Private Institution	93	186	6,495	\$44.41	\$288,442.95
Public Institution	382	764	27,850	\$44.41	\$1,236,818.50
Annualized Totals	1,251,961	2,503,922	764,450		\$13,546,143.20

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 startup costs.

- 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 are no additional costs to the Federal government as a result of the final regulations.

- 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		-151,907	
Total Responses		-553,260	
Total Costs (if applicable)		-\$2,398,500.40	

This information collection filing is an extension to the current burden assessment. Since the initial filing of this information collection package there has been no change to the regulations. The regulations have not changed. There has been a slight increase in the number of institutions reporting those arrangements and a slight decrease in the potential number of students. We are adjusting our burden estimate to 764,450 hours. We are requesting a decrease in the burden hours by -266,630 which is due to agency estimate taking into consideration changes in the number of participating institutions and affected individuals.

- 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.**

Information about institution's arrangements for a T1 or T2 agreement with a third-party servicer will be collected in a centralized database maintained by the Department and made available to the public at the Data Center at our web page, studentaid.ed.gov.

- 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. The OMB expiration dates will be displayed in the Federal Register once approved.

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

There are no exceptions to the certification statement.