

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION  
2023-2024 Free Application for Federal Student Aid**

- 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.**

Section 483, of the Higher Education Act of 1965, as amended (HEA), mandates that the Secretary of Education "...shall produce, distribute, and process free of charge common financial reporting forms as described in this subsection to be used for application and reapplication to determine the need and eligibility of a student for financial assistance..."

The determination of need and eligibility are for the following Title IV, HEA, federal student financial assistance programs: the Federal Pell Grant Program; the Campus-Based programs (Federal Supplemental Educational Opportunity Grant (FSEOG) and Federal Work-Study (FWS)); the William D. Ford Federal Direct Loan (Direct Loan) Program; the Teacher Education Assistance for College and Higher Education (TEACH) Grant; the Children of Fallen Heroes Scholarship and the Iraq and Afghanistan Service Grant.

Federal Student Aid (FSA), an office of the U.S. Department of Education (hereafter "the Department"), subsequently developed an application process to collect and process the data necessary to determine a student's eligibility to receive Title IV, HEA program assistance. The application process involves an applicant's submission of the Free Application for Federal Student Aid (FAFSA®). After submission and processing of the FAFSA form, an applicant receives a Student Aid Report (SAR), which is a summary of the processed data they submitted on the FAFSA form. The applicant reviews the SAR, and, if necessary, will make corrections or updates to their submitted FAFSA data. Institutions of higher education listed by the applicant on the FAFSA form also receive a summary of processed data submitted on the FAFSA form, which is called the Institutional Student Information Record (ISIR).

The specific questions that applicants are asked to answer in the application process are described separately in the Data Elements and Justification document. The document lists all the data elements and explains the purpose and use of each data element in the application. In addition to the calculation of financial need for the various Title IV programs, the FAFSA form also collects data that allows for a determination of an applicant's eligibility for state and institutional financial aid programs. If these data elements were not collected, the Department and institutions of higher education would be unable to make a determination of financial need and subsequently would be unable to award any Title IV, HEA program assistance, as mandated by the HEA. Many states would also be greatly hindered in their calculation of state aid to applicants.

This is a request for revisions of a current information collection, and important changes to the FAFSA form are described separately in the two Summary of Enhancements to the 2023-24 Free Application for Federal Student Aid documents (one for general FAFSA changes, and one to describe web and mobile app specific changes).

- 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 purpose of the application is to collect personal and financial data from current or prospective students in order to perform a need analysis as described in Part F of the HEA. The application is available in English and Spanish and the primary options for completing a FAFSA form include (more specific application options are described in Question 12):

- 1) Electronic FAFSA submissions – Applicants can complete an electronic version of the FAFSA form which offers a customized experience.
- 2) Financial Aid Administrator (FAA) submissions – On behalf of the applicant, this option describes the electronic submission of a FAFSA form by a designated third party (e.g., the Department’s FAA Access system or a postsecondary institution’s mainframe computer); or
- 3) Paper submissions – Applicants can complete and submit the PDF version of the FAFSA form. This version must be mailed to the Department for processing.

As required by Section 483 of the HEA, for applicants that have previously submitted a FAFSA form, there is a renewal FAFSA form that retains certain static data and the applicant only needs to update information that has changed since the previous FAFSA submission. The renewal FAFSA form is available in the electronic versions and to applicants who submit with the assistance of an FAA.

The information an applicant is required to provide on the FAFSA form varies based upon the need analysis formula that is being utilized. There are three need analysis formulas; the first is for dependent students (this formula also requires parental data), the second is for independent students without dependents other than a spouse, and the third formula is for independent students with dependents other than a spouse.

After the application is completed, the applicant submits the form to the Department and the data is processed by the Department’s Central Processing System (CPS). The need analysis results in an expected family contribution (EFC), which is an index used by postsecondary educational institutions and states when determining the types and amounts of both federal and non-federal financial aid students may receive. The EFC is calculated in accordance with the statutory formula in Part F of the HEA and is intended to indicate a student’s ability (and for dependent applicants, his or her family’s ability) to contribute toward the student’s cost of attending a postsecondary educational institution. The following components are considered in the need analysis formula to determine the EFC:

- 1) The available income of (A) the independent student and (if married) the independent student’s spouse, or (B) the dependent student and the dependent student’s parents;
- 2) The number of dependents in the family of the student;
- 3) The number of dependents in the family of the student (excluding the parents) who are enrolled or accepted for enrollment, on at least a half-time basis, in a degree, certificate, or other program leading to a recognized educational credential at an institution of higher education that is an eligible institution in accordance with the provisions of Section 102 of the HEA and for whom the family may reasonably be expected to contribute to their postsecondary education;
- 4) The net assets of (A) the independent student and (if married) the independent student’s spouse, or (B) the dependent student and the dependent student’s parents;
- 5) The marital status of the student;
- 6) The age of the older parent, in the case of a dependent student; and
- 7) Any additional expenses incurred (A) in the case of a dependent student, when both parents of the student are employed or when the family is headed by a single parent who is employed, or (B) in the case of an independent student, when the student is married and the student’s spouse is employed or when the employed student qualifies as a surviving spouse or as a head of household under Title 26, Subtitle A, Chapter 1, Subchapter A, Part I, Section 2 of the Internal Revenue Code of 1986.

The need analysis formula used to determine an EFC changes in order to simplify the application for families who meet specific conditions. The HEA specifies a Simplified Needs Test (SNT) for

calculating the EFC for families who meet the requirements of Section 479 of the HEA. The SNT applies to families who have adjusted gross incomes of less than \$50,000, or income earned from work (for non-tax filers) of less than \$50,000 per year, and who meet at least one of the following eligibility requirements:

- 1) As defined in Section 479(b)(3) of the HEA, the independent student, independent student's spouse, or the dependent student's parent(s) received benefits in the last 24 months from any of the following federal means-tested benefit programs: Supplemental Security Income (SSI), Supplemental Nutrition Assistance Program (SNAP) (formerly the Food Stamp Program), Free or Reduced Price School Lunch, Temporary Assistance for Needy Families (TANF), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and Medicaid; or
- 2) The independent student, the independent student's spouse, or the dependent student's parent(s) is a dislocated worker; or
- 3) An independent student or the dependent student's parent(s) did not file an Internal Revenue Service (IRS) Form 1040 Schedule 1.

All assets are excluded from consideration when calculating the EFC for families who meet the SNT requirements resulting in a simplified needs analysis that utilizes the following six components:

- 1) Adjusted gross income;
- 2) Federal taxes paid
- 3) Untaxed income and benefits;
- 4) The number of family members;
- 5) The number of family members (excluding the parents) in postsecondary education; and
- 6) An allowance (A) for federal and other taxes, as defined in Section 475(c)(2) of the HEA for parents and dependent students, or (B) for federal and local income taxes, as defined in Section 476(b)(2) of the HEA for independent students without dependents, and in Section 477(b)(2) of the HEA for independent students with dependents.

In addition to the simplified needs analysis, there is another circumstance where the need analysis formula to determine an EFC is modified. Section 479(c) of the HEA further simplifies the application by establishing an automatic zero (Auto Zero) formula permitting the automatic determination of an EFC of zero for families within a certain income threshold, and who did not file an IRS Form 1040 Schedule 1, or who received benefits from one of the federal means-tested benefit programs described above, or who meet the dislocated worker criteria. The College Cost Reduction and Access Act of 2007 (P.L. 110-84) indexed the income threshold to be updated annually according to increases in the Consumer Price Index (CPI). For the 2023-24 application cycle the adjusted gross income threshold is expected to be \$27,000 or less for the Auto Zero formula. The Auto Zero formula excludes other income and all assets for the purpose of calculating an EFC. Independent students with no dependents other than a spouse are not eligible to receive an Auto Zero EFC determination.

Once the CPS processes the applicant's data using the appropriate need analysis formula, the Department sends an ISIR electronically to the postsecondary institutions the applicant listed on the FAFSA form. All information reported on the FAFSA form is included on the school's ISIR, except for the list of colleges and associated housing plans. An ISIR is also sent to the state grant agencies (based on the applicant's state of legal residence, as well as the states where the institutions the applicant listed on his or her FAFSA form are located). All information reported on the FAFSA form is included on the state's ISIR, including the list of colleges and associated housing plans.

The Department notifies the applicant of the processing results by sending a SAR in the language the applicant used to submit the FAFSA form. Similar to the ISIR, the SAR will contain the results of the processed application, including the student's EFC, a transcript of the information that the student originally reported on the FAFSA form, and other relevant information (e.g., the applicant's financial aid history from the Department's National Student Loan Data System (NSLDS)). There are three

versions of the SAR that an applicant may receive; a paper SAR, a paper SAR Acknowledgment, or an eSAR.

- 1) The paper SAR is a full summary that is mailed to applicants who filed a paper FAFSA and who did not provide an e-mail address. A paper SAR is also mailed to applicants whose records were rejected due to critical errors during processing.
- 2) The SAR Acknowledgment is a condensed paper SAR that is mailed to applicants who applied electronically but did not provide an e-mail address and do not meet the criteria for a full SAR.
- 3) The eSAR is an electronic version of the SAR that is available in [fafsa.gov](http://fafsa.gov) to all applicants with Federal Student Aid electronic credentials. Notifications for the eSAR are sent to students who applied electronically or by paper and provided a valid e-mail address. These notifications are sent by e-mail and include a hyperlink that takes the user to [fafsa.gov](http://fafsa.gov).

Applicants are expected to review the information on their SAR and, if necessary, correct errors in the reported information, verify the responses if so requested, and supply any missing information. Specifically, there are several ways that an applicant can correct, update, or provide additional information:

- 1) [Fafsa.gov](http://fafsa.gov) – Any applicant who has Federal Student Aid electronic credentials – regardless of how they originally applied – may correct any of the data on the FAFSA form, except the applicant’s Social Security Number (SSN), by using the corrections functionality on [fafsa.gov](http://fafsa.gov);
- 2) Paper SAR – Applicants who receive or request a paper SAR can make hand-written corrections or additions directly on the paper SAR and mail it back to the Department. Corrections to the applicant’s SSN can be made using the paper SAR. Note that although the paper SAR can be used to make changes, the SAR Acknowledgment and the eSAR cannot be used for corrections;
- 3) FAA Access - With the applicant’s permission, an institution can use FAA Access to correct the FAFSA form;
- 4) Electronic Other – With the applicant’s permission, corrections can be made via the postsecondary institution’s third-party servicer, a postsecondary institution’s mainframe computer, or a postsecondary institution’s proprietary software for the student; and
- 5) Federal Student Aid Information Center (FSAIC) – FSAIC has the ability to assist applicants with a limited amount of changes. Any applicant who has their Data Release Number (DRN), which is included on the applicant’s SAR, can make changes to the postsecondary institutions listed on their FAFSA form or change their address by calling FSAIC.

An applicant who corrects and/or updates (as defined in 34 CFR 668.55) their FAFSA form resubmits the information to the Department. The Department, in turn, processes the changed information and sends the applicant a SAR. For most applicants the application process is now concluded, as the Department has processed the most accurate and complete information for use in the need analysis formula and the postsecondary institution is able to determine eligibility and award aid.

Regulations, however, established a verification process (as defined in 34 CFR 668, Subpart E) that requires some applicants to provide documentation to the postsecondary institution to confirm the information reported on the FAFSA form. These procedures “...govern[s] the verification by institutions of information submitted by applicants for student financial assistance in connection with the calculation of their expected family contributions (EFC).”

Applications are selected for verification either by the CPS or by the postsecondary institution. A postsecondary institution must verify all applications the CPS selects for verification. Students selected for verification must complete the verification process with the postsecondary institution, and then the postsecondary institution can award aid once any final changes are submitted to the CPS for processing.

In conclusion, the above narrative provides an overview of the application process that exists to determine an applicant’s eligibility for Title IV, HEA program assistance. Since Title IV, HEA funds should only be awarded to eligible students and the amounts awarded should reflect the actual need of

the applicant and family, the awarding of aid by the financial aid office at the postsecondary institution does not occur until the applicant has completed the entire application process – initial submission, review, corrections and/or verification, if necessary. The entire application process allows the Department to capture the most complete and accurate information for use in the need analysis formula and reduces the possibility that an applicant could receive Title IV, HEA funds they are not eligible to receive.

**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.**

Over time, the Department has made several process improvements that have utilized technological advancements. The following describes some components of the application process that have incorporated such advancements.

**Fafsa.gov**

483(a)(3) of the HEA mandates that, “The Secretary shall produce, distribute, and process forms in electronic format...” Subsequently, the Department developed fafsa.gov in 1998. Fafsa.gov has grown to be the primary entry point for tens of millions of students who apply for federal, state, and institutional financial aid. The Department endeavors to improve fafsa.gov continually to further simplify the application experience for students and families. The following describes the benefits of using fafsa.gov:

- Applications submitted through fafsa.gov are processed much faster than the PDF version of the FAFSA form
- Applicants who have previously applied for aid benefit by completing the renewal FAFSA form, which retains certain static data
- Applicants who need to correct or provide missing information can do so easily by returning to fafsa.gov
- Fafsa.gov offers skip logic and assumption logic that creates a customized, smart application experience based on an applicant’s personal data and previous answers
- In addition to computers, fafsa.gov is accessible from mobile and/or tablet devices, allowing customers to submit applications from the device of their choice
- Applicants who use fafsa.gov benefit from web edits that ensure all required fields are completed and all data conflicts are resolved prior to application submission, which makes for a reduced application rejection rate during processing
- Fafsa.gov is a safe and secure web site that uses standard commercial encryption protocols that determine the highest encryption level the browser will support
- In compliance with the Americans with Disabilities Act, fafsa.gov is 508-compliant and accessible to visually impaired applicants.

**Electronic Signature and FSA ID**

The FSA ID, which consists of a user-created username and password, can be used as an electronic signature for the FAFSA form. Since the submission of the FAFSA form requires the applicant's signature and the parent's signature, if the applicant is a dependent student and parental information is provided, the FSA ID facilitates an easier application experience by eliminating the need for a paper signature submission. In addition, the FSA ID can be used each year to access the renewal FAFSA form and to access processed FAFSA data to make corrections or updates.

### **Customer Service – Federal Student Aid Information Center (FSAIC)**

In addition to the assistance handling inquiries about the financial aid process, the application, and the FSA ID, FSAIC offers technological features that have simplified the application experience for many applicants.

- Chat – live web chat capability with a customer service representative
- Email – email communications with a customer service representative
- Automated phone self-service – The interactive voice response unit (IVRU) menus offer self-service functionality or some of the most common customer inquiries including a FAFSA application status check and answers to frequently asked questions. These features are available to customer 24 hours a day, 7 days a week and require no agent assistance.
- Expanded call center hours – hours of operation include regular weekend hours throughout the year to provide better assistance during the weekend.

### **Image and Data Capture (IDC)**

The Department has maintained the IDC document management system. The system scans images, captures data, and sends the data for processing to the CPS. The IDC utilizes optical character recognition (OCR) to electronically recognize and capture typed or hand-written data from the printed FAFSA PDF and paper SAR. Use of this technology results in the automation of data entry tasks, thus reducing the processing time for applicants.

#### **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 FAFSA collection requirements do not contain any duplication of data elements. Because legislation requires that the FAFSA form be completed annually by applicants, returning applicants encounter similar questions in subsequent years. To reduce that burden, the renewal FAFSA form is available and reuses much of the data previously submitted. Required responses on the renewal FAFSA form are limited to income and asset questions likely to change from year to year.

The review and corrections segment of the application process does not duplicate the process of initial data collection. Reviewing and correcting the application is also fundamental to the application experience because it creates an opportunity to obtain the most accurate applicant information.

#### **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.**

The collection of eligibility information for the awarding of student aid does not impact small businesses.

**6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the application process was not completed and data elements not collected, the Department would be unable to make an accurate determination of financial need and subsequently award any Title IV, HEA program assistance, as mandated. In addition, the HEA requires annual determination of the applicant's need for Title IV, HEA program assistance. If the data were collected less frequently, the Department would be in violation of the law. Although an applicant must reapply and receive a new need analysis for every year that student aid is requested, use of the renewal FAFSA form, as described previously, reduces the amount of new data that a student must provide.

As a part of the annual application process, the corrections component provides an opportunity for the applicant to make corrections. The corrections component is crucial for assuring that comprehensive, accurate data is used to calculate the applicant's EFC and overall financial aid eligibility. If the Department were unable to request verification or correction of submitted data, the EFC could be calculated using questionable or erroneous data. In addition, errors discovered as a result of multiple federal database matches (e.g., Social Security Administration (SSA), Department of Homeland Security (DHS), Veteran Affairs, etc.) could not be corrected. The result would be countless incomplete or inaccurate FAFSA forms and, potentially, millions of incorrect eligibility determinations resulting in the loss of taxpayer dollars by awarding Title IV, HEA program assistance based on erroneous applicant data.

**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.**

The application does not invoke special circumstances, as described in the Paperwork Reduction Act submission instructions.

- 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.**

On February 24, 2022, a Federal Register Notice was published (Vol. 87, No 37, pages 10347-10349) inviting public comment on this information collection. 49 comments were received, and FSA's responses are attached in the document entitled *1845-0001 2023-24 60-day Comment Period Summary*. Changes were made to the collection or the forms based on these comments. The specific changes made to the FAFSA form as a result of the public comments received are described separately in the Paper and Student Electronic Summary of Enhancements documents. 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.**

There are no payments or gifts for the completion and/or submission of the application.



- 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.<sup>1</sup> 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 confidentiality of the data collected is discussed in the Routine Uses section of the System of Records Notice for the Federal Student Aid Application File (18-11-01), published in 64 FR 30159–30161 (June 4, 1999), as amended by, 64 FR 72407 (December 27, 1999), as amended by, 65 FR 11294 (March 2, 2000), as amended by 66 FR 18758 (April 11, 2001), as amended by, 74 FR 68802-68808 (December 29, 2009), as amended by 76 FR 46774-46781 (August 3, 2011), and as amended by 84 FR 57856-57863 (October 29, 2019).

A section on Privacy, printed on page two of the PDF FAFSA and linked from the homepage of [fafsa.gov](http://fafsa.gov) and from the menu in the myStudentAid mobile app, informs the applicant that the postsecondary educational institutions identified by the student will also have access to the data, and that the grant agencies in the applicant’s state of legal residence will receive the data even if the student does not provide consent pursuant to section 483(a)(10) of the HEA. The Department of Education allows state grant agencies to disclose certain limited “FAFSA Filing Status Information” to certain entities (secondary schools, local education agencies (LEAs), and other designated entities), so those certain entities can help facilitate students’ completion of the FAFSA form. The limited FAFSA completion information includes the date the FAFSA form was submitted, the date the FAFSA form was processed, whether the applicant was chosen for verification, and the completion status of the FAFSA form.

Privacy Act information is available on the paper SAR and accessible at all times from [fafsa.gov](http://fafsa.gov) and myStudentAid mobile app. In addition, agencies such as law enforcement agencies, the Office of Management and Budget (OMB), the Department of Justice (DOJ), the Government Accountability Office (GAO), Congress, and other entities have access to the data. No other individuals have access to this information without the express written consent of the applicant or as authorized by the Secretary consistent with the provisions of Section 483(a)(3)(E).

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<sup>1</sup> 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)

- 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 FAFSA form does not contain questions of a sensitive nature beyond those needed to determine the applicant's eligibility for Title IV assistance and calculate an EFC.

- 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.**

**Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.**

For the 2023-2024 FAFSA form, the Department continues to utilize the applicant burden model (ABM) which was approved by the Office of Management and Budget (OMB) beginning with the 2016-2017 application cycle.

The estimates included are the result of the Department's efforts to determine the public's burden as it relates to the application process for federal student aid. The ABM measures applicant burden through an assessment of the activities each applicant conducts in conjunction with other applicant characteristics and in terms of burden, the average applicant's experience. Key determinants of the ABM include:

- The total number of applicants that will potentially apply for federal student aid;
- How the applicant chooses to complete and submit the FAFSA form (e.g., by paper or electronically);
- How the applicant chooses to submit any corrections and/or updates;
- The type of SAR document the applicant receives (eSAR, SAR acknowledgment, or paper SAR);
- If the applicant is auto zero eligible and if able, elects to skip certain income and asset questions; and
- The average amount of time involved in preparing to complete the application.

For the 2023-2024 FAFSA cycle, the Department is estimating the number of FAFSA forms to be submitted will be equal to the number of students projected to be enrolled in the fall term. Given the uncertain nature of post-secondary enrollment moving forward, the Department needs to be prepared for every potential post-secondary enrollee to submit a FAFSA form. The Projections of Education Statistics prepared by the U.S. Department of Education, National Center for Education Statistics (NCES), Integrated Postsecondary Education Data System provides estimates of the total enrollment in all degree-granting institutions.

**Table 1. Enrollment projections from NCES Projections of Education Statistics (in thousands)**

<b>Year</b>	<b>Enrollment Projections</b>
2022	19,813
2023	19,861
2024	19,926
2025	19,993

Note: Data prepared February 2021

Based on these factors, the Department estimates that 19,861,000 FAFSA forms will be submitted for 2023-2024.

Once the applicant volume is projected, we determine the total estimated burden and cost by examining each FAFSA completion method. The completion method reflects how applicants choose to complete and submit the FAFSA form. Each completion method is assigned an individual burden estimate to reflect the average time an applicant will spend to prepare, complete and submit a FAFSA form and/or correction. For 2023-2024 estimates, we determined that the 2020-2021 cycle offers a complete data set to help baseline projections for individual burden. It should also be noted that the Department determined that recordkeeping would not be documented as a component of the burden estimate. Since the Department retains, for the applicant, summaries of the data submitted and a history of their changes, the need for an applicant to retain a set of records is optional.

The components that were included in the individual burden estimate include information from the central processing system and user data from surveys and this allowed us to estimate the individual burden for each completion method. The individual burden estimate includes the following:

- 1) Preparation – Average time it takes to review instructions and gather the documents necessary to complete the FAFSA form (e.g., FAFSA PDF, copies of W-2 forms, student/spouse and/or parent’s Federal income tax returns, bank statements);

- 2) Completion – Average time it takes for data entry (paper or electronic), referencing instructions, or accessing on-line help or calling customer service; and
- 3) Submission – Average time it takes to review the Certification Statement, apply signatures, make copies of paper forms or print electronic outputs, and if necessary, obtain postage and mail.

As a result, Table 2 details the initial submission behavior (completion method) and provides the total burden for submission of the FAFSA form; along with associated costs by type of application. Information Collection instruments FAFSA (IC 1), FAFSA Renewal (IC 2), FAFSA EZ (IC 3), and FAFSA EZ Renewal (IC 4) include aggregate projections comprised of fafsa.gov and myFAFSA submissions. The myFAFSA component of myStudentAid is another electronic modality completed by applicants to submit a FAFSA form and will be treated as such for this information collection request.

Table 3 details the corrections behavior by type of corrections submitted and allows us to calculate the burden associated with each correction method; associated costs by type of correction are also provided.

Table 4 shows the total number of SARs distributed as a result of the initial submission of the FAFSA and any corrections made. Table 4 also identifies the type of SARs distributed and provides associated cost for each.

Lastly, Table 5 summarizes the overall total annual responses, overall total annual burden and overall total costs for the 2023-2024 Federal Student Aid Application. Total annual responses for the 2023-2024 Federal Student Aid Application are estimated to be 33,962,310. The total estimated burden for the 2023-2024 Federal Student Aid Application is 22,844,712 hours, a decrease of 3,466,325 hours from the prior cycle year projection. The decrease is attributed to a smaller than anticipated FAFSA volume combined with removing two questions from the application for the upcoming 2023-2024 cycle. Table 5 also summarizes the annual cost burden to complete the application process, which is \$56,051.80, a decrease of \$77,603.70 from the prior projection. The decrease in costs is attributed to the decrease in applicants submitting corrections via paper SAR. The annual cost burden is comprised of the individual postage cost of 58 cents that would be required of applicants who choose to submit a printed PDF FAFSA (Table 2) or correct a paper SAR (Table 3).

**Table 2. Initial submission of FAFSA forms**

Initial Submission of FAFSA (Part 1 of Application Process)							
Type of Application Filed	Type of FAFSA Applicant (Independent or Dependent)	Percent	Estimated Number of Applicants (Volume)	Estimated Individual Applicant Burden (Hours)	Estimated Individual Applicant Cost (Dollars)	Total Burden for All Applicants (Hours)	Total Cost for All Applicants (Dollars)
<b>Student Entry- Electronic</b>							
FAFSA (IC 1)	<i>Overall Usage</i>		46.79%				
The electronic version of the FAFSA completed by applicants.	Dependent	46%	4,249,671	1.56	\$ -	6,608,722	\$ -
	Independent	54%	5,042,361	0.76	\$ -	3,840,966	\$ -
	<b>Subtotals</b>		<b>9,292,033</b>			<b>10,449,686</b>	\$ -
<b>FAFSA - Renewal (IC 2)</b>							
	<i>Overall Usage</i>		40.78%				
The electronic version of the FAFSA completed by applicants	Dependent	52%	4,194,636	1.19	\$ -	4,986,567	\$ -
	Independent	48%	3,904,680	0.63	\$ -	2,471,788	\$ -

who have previously completed the FAFSA.								
FAFSA - EZ (IC 3)	<b>Subtotals</b>		<b>8,099,316</b>			<b>7,458,355</b>	\$	-
	<i>Overall Usage</i>		6.48%					
The electronic version of the FAFSA for applicants who qualify for the Simplified Needs Test (SNT) or Automatic Zero (Auto Zero) needs analysis formulas.	Dependent	39%	498,581	1.30	\$ -	650,194	\$	-
	Independent	61%	788,412	0.64	\$ -	504,602	\$	-
	<b>Subtotals</b>		<b>1,286,993</b>			<b>1,154,796</b>	\$	-
FAFSA - EZ Renewal (IC 4)	<i>Overall Usage</i>		5.28%					
The electronic version of the FAFSA for applicants who have previously completed the FAFSA and who qualify for the Simplified Needs Test (SNT) or Automatic Zero (Auto Zero) needs analysis formulas.	Dependent	49%	508,915	0.90	\$ -	459,403	\$	-
	Independent	51%	539,746	0.50	\$ -	269,536	\$	-
	<b>Subtotals</b>		<b>1,048,661</b>			<b>728,939</b>	\$	-
<b>School Entry</b>								
FAA Access (IC 5)	<i>Overall Usage</i>		0.14%					
With the FAFSA filer's permission, an institution can use FAA Access to submit the FAFSA.	Dependent	21%	5,736	1.56	\$ -	8,921	\$	-
	Independent	79%	22,069	0.76	\$ -	16,811	\$	-
	<b>Subtotals</b>		<b>27,805</b>			<b>25,732</b>	\$	-
FAA Access - Renewal (IC 6)	<i>Overall Usage</i>		0.13%					
With the FAFSA filer's permission, an institution can use FAA Access to submit the Renewal FAFSA for an applicant.	Dependent	26%	6,643	1.19	\$ -	7,897	\$	-
	Independent	74%	19,176	0.63	\$ -	12,139	\$	-
	<b>Subtotals</b>		<b>25,819</b>			<b>20,036</b>	\$	-
FAA Access - EZ (IC 7)	<i>Overall Usage</i>		0.11%					
With the FAFSA filer's permission, an institution can use FAA Access to submit the FAFSA for applicants who qualify for the Simplified Needs Test (SNT) or Automatic Zero (Auto Zero) needs analysis formulas.	Dependent	50%	11,017	1.30	\$ -	14,368	\$	-
	Independent	50%	10,830	0.64	\$ -	6,931	\$	-
	<b>Subtotals</b>		<b>21,847</b>			<b>21,299</b>	\$	-
FAA Access - EZ Renewal (IC 8)	<i>Overall Usage</i>		0.12%					
With the FAFSA filer's permission, an institution can use FAA Access to submit the	Dependent	57%	13,722	0.90	\$ -	12,387	\$	-
	Independent	43%	10,337	0.50	\$ -	5,162	\$	-

	<b>Subtotals</b>		<b>24,059</b>			<b>17,549</b>	\$ -
Renewal FAFSA for applicants who qualify for the Simplified Needs Test (SNT) or Automatic Zero (Auto Zero) needs Electronic Other (IC 9)	<i>Overall Usage</i>		0.0136%				
"Electronic Other Original" refers to the submission of FAFSA data using the Electronic Data Exchange (EDE) process. With the FAFSA filer's permission, a FAFSA can be submitted via: a school's third party servicer, a school's mainframe computer, or a school's proprietary software.	Dependent	18%	497	1.24	\$ -	615	\$ -
	Independent	82%	2,196	0.63	\$ -	1,391	\$ -
	<b>Subtotals</b>		<b>2,693</b>			<b>2,006</b>	\$ -
<b>Paper Submissions</b>							
Printed FAFSA (IC 10)	<i>Overall Usage</i>		0.16%				
The printed version of the FAFSA provided for applicants who are unable to access the Internet or complete the electronic form.	Dependent	22%	7,004	1.74	\$ 0.58	12,170	\$ 4,062.32
	Independent	78%	24,771	1.13	\$ 0.58	28,079	\$ 14,367.18
	<b>Subtotals</b>		<b>31,775</b>			<b>40,249</b>	\$ 18,429.50
<b>Total Applicants</b>							19,861,000
<b>Burden for Applicants</b>							19,918,650
<b>Cost for Applicants</b>							\$18,429.50

**Table 3. Correcting submitted FAFSA information**

<b>Correcting Submitted FAFSA Information (Part 3 of Application Process)</b>							
<b>Type of Correction</b>	<b>Type of FAFSA Response by Filing Option (Independent or Dependent)</b>		<b>Estimated Number of Corrections Received (Volume)</b>	<b>Estimated Individual Burden (Hours)</b>	<b>Estimated Individual Applicant Cost (Dollars)</b>	<b>Total Burden for All Respondents (Hours)</b>	<b>Total Cost for All Applicants (Dollars)</b>
<b>Fafsa.gov</b>	<i>Overall Usage</i>		43.84%				
Any applicant who has an FSA ID - regardless of how they originally applied - may correct using FOTW Corrections.	Dependent	67%	4,171,005	0.18	\$ -	750,781	\$ -
	Independent	33%	2,011,009	0.12	\$ -	241,321	\$ -
	<b>Subtotals</b>		<b>6,182,014</b>			<b>992,102</b>	
<b>Electronic Other - Corrections</b>	<i>Overall Usage</i>		22.21%				
With the applicant's	Dependents		3,131,901	0.05	\$ -	156,595	\$ -

permission, corrections can be made via: a school's third party servicer, a school's mainframe computer, FAA Access or a school's proprietary software.	Independents						
<b>Paper SAR</b>	<i>Overall Usage</i>		0.46%				
Applicants can write corrections directly on the paper SAR and mail for processing.	Dependents & Independents		64,866	0.12	\$ 0.58	7,784	\$ 37,622.30
<b>FAA Access - Corrections</b>	<i>Overall Usage</i>		5.20%				
With the FAFSA filer's permission, an institution can use FAA Access to correct the FAFSA.	Dependents & Independents		733,268	0.05	\$ -	36,663	\$ -
<b>Internal Department Corrections</b>	<i>Overall Usage</i>		27.93%				
The Department will submit an applicant's record for system generated corrections. There is no burden to the applicants under this correction type.	Dependents & Independents		3,938,496	0.00	\$ -	0	\$ -
<b>FSAIC Corrections</b>	<i>Overall Usage</i>		0.36%				
Any applicant, who has their Data Release Number (DRN), can make changes to the postsecondary institutions listed on their FAFSA or change their address by calling FSAIC.	Dependents & Independents		50,765	0.05	\$ -	2,538	\$ -
<b>Total Corrections</b>							14,101,310
<b>Burden for Applicants</b>							1,195,683
<b>Cost for Applicants</b>							\$37,622.30

**Table 4. Reviewing FAFSA information – Student Aid Report distribution**

<b>Reviewing Processed FAFSA Information (Part 2 of Application Process)</b>							
<b>Type of SAR Sent</b>	<b>Type of FAFSA Respondent by Filing Option (Independent or Dependent)</b>		<b>Documents Sent (Volume)</b>	<b>Estimated Individual Burden (Hours)</b>	<b>Estimated Individual Applicant Cost (Dollars)</b>	<b>Total Burden for All Applicants (Hours)</b>	<b>Total Cost for All Applicants (Dollars)</b>
SAR Electronic (eSAR)	<i>Distribution</i>		96.0%				
PDF version of the SAR for applicants who applied electronically or by paper and provided an e-mail address.	Dependents & Independents		32,603,818	0.05	\$ -	1,630,191	\$ -
SAR Acknowledgment	<i>Distribution</i>		2.1%				

Condensed paper SAR that is mailed to applicants who applied electronically but did not provide an e-mail address.	Dependents & Independents	713,209	0.05	\$ -	35,660	\$ -
Paper SAR	<i>Distribution</i>	1.9%				
Full paper summary that is mailed to paper applicants who did not provide an e-mail address, to applicants who did not sign their application and to applicants whose records were rejected during processing because the Social Security Number did not match with the SSA.	Dependents & Independents	645,284	0.10	\$ -	64,528	\$ -
Total SARs Sent to All Applicants						33,962,310
Burden for Applicants						1,730,379
Cost for Applicants						\$0.00

<b>Table 5. Total burden and total costs for 2023-2024 FAFSA form Application Process Summary</b>			
	<b>Responses</b>	<b>Burden (Hours)</b>	<b>Cost (Dollars)</b>
Initial Submission	19,861,000	19,918,650	\$18,429.50
Corrections	14,101,310	1,195,683	\$37,622.30
SAR Review	0	1,730,379	\$0.00
<b>Total Annual Responses</b>	<b>33,962,310</b>		
<b>Total Burden for All Applicants</b>		<b>22,844,712</b>	
<b>Total Cost for All Applicants</b>			<b>\$56,051.80</b>

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 : N/A**  
**Total Annual Costs (O&M) : N/A**  
**Total Annualized Costs Requested : N/A**

- 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.**

The projected cost to create the application, related applicant products or instructional materials for 2023-2024 is \$29,616,481. The projections also include the cost associated with the operations and maintenance of the Department’s CPS and other costs like printing, mailing, and customer service.

**Table 6. Annual Costs**

<b>Projected Costs</b>	<b>2023-2024</b>
<b>Category 1 – AEDS &amp; DCC Operations and Maintenance Services:</b>	
<b>Front end:</b> This category is the primary delivery area performed under the DCC contract. It consists of system development and maintenance of Information Technology (IT) products and the primary operational programs: FAFSA web services, status reports, myFAFSA component of myStudentAid mobile app, ongoing support of existing software and hardware, Business Process Optimization enablement (call center), management of volume peaks, design services, usability tests, and statistical analysis support.	<b>\$ 5,779,027</b>
<b>Back end:</b> This category is the primary delivery area performed under the AEDS contract. Its consists of system development and maintenance of Information Technology (IT) products and the primary operational programs: Central Processing Systems (CPS) mainframe software and systems, develop the paper application and other paper products related to eligibility, status reports, ongoing support of existing software and hardware, management of volume peaks, Managing Printing of CPS mailing, Editorial Services, CPS/ Student Aid Information Gateway (SAIG) Help desk & Customer Communications, Image and Data Capture (IDC), E-mail, Print, and other Operational Services including Conference Support, Participation Management (PM) Operations, Form Support (FAFSA Forms and PM Enrollment Forms), FAA Access to CPS Online and EDExpress support, postage and mailing of SARs and SAR Acknowledgements, and Statistical Analysis Support.	<b>\$ 23,837,454</b>

<b>Total Projected Annual Cost</b>	<b>\$ 29,616,481</b>
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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.**

The Department adjusted the data set used to calculate the burden projections. For 2023-2024 estimates, we utilized the 2020-2021 application cycle results, which offered a complete data set, to forecast individual burden. The Department believes this more accurately reflects and depicts our respondent universe.

The Department is projecting a burden decrease of 3,466,325 hours. The burden decrease is attributed to two main reasons – a significant decrease in estimated corrections, and an enhanced and optimized electronic FAFSA form. The Department has been able to use more informed data to better help design and respond to customer needs. This has allowed us to develop an improved form and process that requires fewer corrections. Combined with robust usage of the IRS Data Retrieval Tool (DRT), applicants and school financial aid personnel are submitting fewer corrections than they have in the past. Additionally, we have redesigned the look and feel on fafsa.gov, allowing users to have a more interactive and intuitive customer experience.

	<b>Program Change Due to New Statute</b>	<b>Program Change Due to Agency Discretion</b>	<b>Change Due to Adjustment in Agency Estimate</b>
<b>Total Burden</b>		-2,688,071	-778,254
<b>Total Responses</b>		-2,414,890	-4,610,438
<b>Total Costs (if applicable)</b>			

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 the collected information will not be published for tabulation or publication.

**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 expiration date for OMB approval will not be included on the 2023-2024 PDF FAFSA for design reasons, although the OMB control number is displayed. The term of approval and use of the form is apparent in the first-page instructions that inform applicants to send in the form from October 1, 2022 through June 30, 2024.

The expiration date for OMB approval will not be included on the 2023-2024 paper SAR for design reasons, although the OMB control number is displayed. The term of approval is apparent in the paper and electronic versions of the application which would have to be submitted in order to generate a SAR.

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

Exceptions to the certification requirement are not requested for this information collection.