

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**
Federal Student Loan Debt Relief Application and Verification Forms Request

- 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 (Department) is requesting an emergency clearance for a new information collection. This collection will be used to obtain information from federal student loan borrowers to determine eligibility for loan discharge announced by the Secretary of Education on August 24, 2022 under the authority of Title IV of the Higher Education Act of 1965, as amended (HEA) (20 U.S.C. 1070 et seq.); 20 U.S.C. 1018(f) and 1087e(h); the Higher Education Relief Opportunities for Students Act of 2003 (20 U.S.C. § 1098 bb)) (including any waivers or modifications that the Secretary of Education deems necessary to make to any statutory or regulatory provision applicable to the federal student financial assistance programs under title IV of the HEA to achieve specific purposes listed in the section in connection with a war, other military operation, or a national emergency); and, 31 U.S.C. 7701 and Executive Order 9397, as amended by Executive Order 13478 (November 18, 2008).

To implement the Secretary's directive, the Department must, as soon as practicable, establish a process available to all federal student loan borrowers to request a discharge, attest to their income eligibility for loan discharge, and verify that income, if requested by the Department. Federal Student Aid has developed application forms (borrower and parent), an income verification form, and a parent income waiver request in compliance with this directive. As designed, each student loan borrower would complete an online or paper student loan debt relief application form to request consideration for loan discharge within 12 months of the end of the payment pause (December 31, 2022) and must verify their income, if required, by March 31, 2024.

Due to the limited time between announcement on August 24, 2022, the importance of having the application available before the end of loan payment pause on December 31, 2022, and the urgency of providing financial relief from the ongoing economic impact of the COVID-19 public health emergency, we request that OMB approve the collection associated with the implementation of the application forms and verification process under the emergency clearance procedures of the Paperwork Reduction Act of 1995, outlined in 44 U.S.C. 3507(j), by October 7, 2022. If this request is not granted, the

Department would be unable to implement this loan discharge before the end of the loan payment deferral on December 31, 2022 which would result in further hardship for a large number of affected borrowers being obligated to restart payment before their discharge could be processed, causing them additional financial harm. Additionally, the Department is requesting that the full clearance package be filed at the same time and that the 60-day public comment period be initiated at the same time.

Upon emergency approval the Department will be able to accelerate implementation for maximum benefit to federal student loan borrowers continuing to manage the economic hardship of the COVID-19 public health emergency. If the Department were required to put the collection through the normal clearance process, we could not begin to implement the program, which would result in delays in providing eligible borrowers financial relief until after the end of the loan deferral on December 31, 2022.

- 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 collected will be used by the Department to make a determination of borrower eligibility for loan discharge. The Department will use the borrower's request for discharge and attestation of qualifying income (or if required, dependent borrower's parent's income) to process qualifying borrowers' loan discharges. Borrowers who believe they have been identified in error as dependent on their parents for financial aid purposes or who cannot provide parent income due to extenuating circumstances will complete the Parent Income Waiver form. Borrowers selected to verify their income will be asked to provide their federal income tax filing status and upload documentation of income using the verification form. The Department has developed an approach to assess which borrowers are higher income, and therefore closer to the income cutoff, to identify applicants who must fill out the income verification form. All applicants who present a higher likelihood of exceeding the income cutoff will have to submit documentation to prove their income. The Department will rely on information provided directly by the borrower and is not planning to request data from the Internal Revenue Service (IRS) at this time.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

The Department is maximizing the use of automation as we expect most borrowers will apply online providing sufficient information to allow the Department to match them to their outstanding loans with minimal burden. Borrowers will attest to their qualifying income and, if selected, be directed to the verification form to upload documentation supporting their attestation of federal income. Borrowers enrolled in postsecondary education in 2021-22 for whom the Department does not have data to determine they are independent, will be directed to the parent income form. Once determined to be income eligible, the Department will be able to determine the loan discharge procedures based on the borrowers' federal loan debt. The preferred submission method is via website accessible on studentaid.gov, but the form(s) will be made available for print and paper submission.

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 initiative requires the borrower to request a Federal Student Loan Discharge. In addition, the Department does not have the required income information for all borrowers in its possession to determine if a borrower qualifies for a loan discharge. Where the Department does have applicable income data, it will use that data to notify borrowers of their eligibility for discharge and provide the opportunity to borrowers to opt out of the program. For borrowers who do not choose to opt out, the Department will process loan discharges without the borrower needing to take any action. There is no duplication of 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.

No small businesses are affected by this information collection.

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

Absent the proposed data collections, the Department would not have sufficient or accurate information required to make eligibility determinations for loan discharge authorized for many eligible borrowers.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
- requiring respondents to report information to the agency more often than quarterly;
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - requiring respondents to submit more than an original and two copies of any document;
 - requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
 - in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

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

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

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

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

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if

the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

This is a request for a six-month emergency clearance of the information collection process to allow the Department to collect information from borrowers to determine eligibility for loan discharge.

A request for this emergency clearance has been sent to the Federal Register and the emergency clearance package will be submitted to OMB as soon as the emergency notice publishes.

Included in the emergency notice sent to the Federal Register is the request for a 60-day public comment period as is required for the full 3 year clearance package.

The updated clearance package will be submitted to OMB after the 60 day public comment period has ended and a 30-day Federal Register notice has been published in order to allow for full public comment on the process.

The updated package will include a description of public comments received, the Department's response to those comments, and a discussion of whether the public feedback was adopted, and why or why not.

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

No payments or gifts have been provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.¹ If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden

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)

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 Department will include the following Privacy Act statement in each of the student loan debt relief application forms:

The Privacy Act of 1974, as amended (5 U.S.C. 552a), requires that the following notice be provided to you:

The authorities for collecting the requested information from and about you via this form are title IV of the Higher Education Act of 1965, as amended (HEA) (20 U.S.C. 1070 et seq.); 20 U.S.C. 1018(f) and 1087e(h); the Higher Education Relief Opportunities for Students Act of 2003 (20 U.S.C. § 1098bb) (including any waivers or modifications that the Secretary of Education deems necessary to make to any statutory or regulatory provision applicable to the federal student financial assistance programs under title IV of the HEA to achieve specific purposes listed in the section in connection with a war, other military operation, or a national emergency); the Presidential Memorandum entitled, "A Student Aid Bill of Rights to Help Ensure Affordable Loan Repayment" (March 10, 2015); and 31 U.S.C. 7701 and Executive Order 9397, as amended by Executive Order 13478 (November 18, 2008).

Participating in the Federal Student Loan Relief is voluntary, but you must provide your SSN and enough of the other requested information on this form so that the U.S. Department of Education (Department) can verify your identity in order to participate. The principal purposes for collecting the information on this form, including your SSN, are to verify your identity, to determine your eligibility to receive loan relief, and to permit the servicing of your loans. Failure to provide any of the requested information may result in your application for Federal Student Loan Relief not being processed.

The requested information on this form also may be disclosed without your consent, on a case-by-case basis or under a matching program, to third parties as authorized under routine uses set forth in the system of records notices entitled, "Common Services for Borrowers (CSB)" (18-11-16) and "Enterprise Data Management and Analytics Platform Services (EDMAPS)" (18-11-22). All published systems of records notices are available under the "Department System of Records Notice"/"Federal Student Aid (FSA)" subsection of the U.S. Department of Education's "Privacy Act System of Record Notice Issuances (SORN)" webpage located at <https://www2.ed.gov/notices/ed-pia.html>. A summary of some of the routine uses in these system of records notices are set forth below.

To assist with the determination of eligibility for loan discharges, the Department may disclose records to holders of loans made under title IV of the HEA. To verify the identity of the individual whom records indicate has applied for or received title IV, HEA program

funds, disclosures may be made to guaranty agencies, educational and financial institutions, and their authorized representatives; to Federal, State, Tribal, or local agencies, and their authorized representatives; to private parties, such as relatives, business and personal associates, and present and former employers; to creditors; to consumer reporting agencies; to adjudicative bodies; and to the individual whom the records identify as the party obligated to repay the title IV, HEA obligation.

To determine program eligibility and benefits, disclosures may be made to guaranty agencies, educational and financial institutions, and their authorized representatives; to Federal, State, or local agencies, and their authorized representatives; to private parties, such as relatives, business and personal associates, and present and former employers; to creditors; to consumer reporting agencies; and to adjudicative bodies.

In the event of judicial or administrative litigation or Alternative Dispute Resolution (ADR), we may send the requested information on this form to the Department of Justice, an adjudicative body, counsel, representative, party, or witness if the disclosure is relevant and necessary to the judicial or administrative litigation or ADR. If the requested information on this form indicates, either alone or in connection with other information, a violation or potential violation of any applicable statutory, regulatory, or legally binding requirement, we may send it to an entity charged with the responsibility for investigating or enforcing those violations or potential violations. We may send the requested information on this form to a Member of Congress or the Member's staff when necessary to respond to an inquiry from the Member that was made at your written request and on your behalf. Disclosure of the requested information on this form may be made to our contractors for the purpose of performing any function that requires disclosure including for the purpose of Federal Student Loan Relief. As part of any contract with any such contractor, we shall require the contractor to agree to establish and maintain safeguards to protect the security and confidentiality of the disclosed information. Disclosures may also be made to certain researchers under certain circumstances including the researchers agreeing to establish and maintain safeguards to protect the security and confidentiality of the disclosed information.

Further, if the requested information on this form is shared with other principal offices of the U.S. Department of Education that have a need for it in the performance of their job duties, such as the Office of Inspector General, then it may be shared with third parties as authorized under routine uses set forth in such office's system of records notices, such as the "Investigative Files of the Inspector General" (18-10-01).

- 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 application forms require borrowers (or their parents) to affirm that their federal adjusted gross income (AGI) is below required thresholds, although detailed income data, such as tax forms, are not required at the time of application. Only federal income data are required to determine eligibility for a loan discharge.

The verification form requires the borrower (or their parents), when selected, to provide their 2021 or 2020 AGI as reported to the IRS. They will upload documentation to verify the income reported. These data are required to validate the information reported by borrowers and ensure integrity of the Federal Student Loan Discharge.

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.**

The estimated time required to complete the application form is 10 minutes per request for borrowers and parents using the online application form. This estimate includes the time to enter identifying information and to review tax forms to confirm federal AGI is below the eligibility threshold. The estimated time for borrowers and parents using the paper student loan debt relief application form will increase to 15 minutes to account for additional printing

and mailing time. Based on one response per respondent, this equates to a total estimated annual reporting burden of 5,184,00 hours.

The estimated time required to complete the income verification form is 30 minutes per request for borrowers using the online form. This estimate includes the time to obtain, review and upload required tax forms to confirm AGI is below the eligibility threshold. The estimated time for borrowers using the paper income verification form will increase to 35 minutes to account for additional printing and mailing time. Based on one response per respondent, this equates to a total estimated annual reporting burden range of 502,800 to 2,514,00 hours.

The estimated time required to complete the parent income waiver form is 5 minutes per request for borrowers using the online form. This estimate includes the time to review the eligibility information and affirm status. The estimated time for borrowers using the paper parent income waiver form will increase to 10 minutes to account for additional printing and mailing time. Based on one response per respondent, this equates to a total estimated annual reporting burden of 19,675 hours.

It is estimated that approximately 30 million borrowers will be required to submit the Borrower Application form and approximately 3 million will be required to submit the Parental Income form. It is estimated that approximately 237,500 will be submit the Parent Income Waiver form. Each of these estimates are a function of the estimated total number of eligible borrowers minus the number of borrowers projected to receive automatic debt relief and then adjusted for borrower-level take-up estimates.

The Department has developed an approach to assess which borrowers are higher income, and therefore closer to the income cutoff, to identify applicants who must fill out the income verification form. Applicants who present a higher likelihood of exceeding the income cutoff will have to submit documentation to prove their income. The number of people who must fill out the income verification form is dependent on the number of total applicants, which is greatly uncertain as well as other factors. It is estimated that between approximately 1 million and up to approximately 5 million borrowers will be required to submit the verification form and provide supporting documentation.

The estimated time required to complete the application form is 10 minutes per request for borrowers using the online form. This estimate includes the time to enter identifying information to match to loan records and to review tax forms to confirm federal AGI is below the eligibility threshold. Based on one response per respondent, this equates to a total estimated annual online reporting burden of 4,921,500 hours (28,950,000 respondents x 0.17 hours = 4,921,500 burden hours). Estimates for borrowers using the paper student loan debt relief application form will increase to 15 minutes to account for additional printing and mailing time. Based on one response per respondent, this equates to a total estimated annual paper reporting burden of 262,500 hours (1,050,000 respondents x .25 hours = 262,500 burden hours). This is a total burden for filing the student loan debt relief application forms of

5,184,000 hours ($4,921,500 + 262,500 = 5,184,000$ hours) for 33,000,000 borrowers (28,950,000 + 1,050,000).

The estimated time required to complete the income verification form is 30 minutes per request for borrowers using the online form. This estimate includes the time to login to studentaid.gov using their FSAID, review, and upload required tax forms to confirm AGI is below the eligibility threshold. Based on one response per respondent, this equates to a total estimated annual online reporting burden range between 482,500 to 2,412,500 hours (965,000 to 4,825,000 respondents x .50 hours = 482,500 to 2,412,500 hours). The estimate for borrowers using the paper verification form will increase to 35 minutes to account for additional printing and mailing time. Based on one response per respondent, this equates to a total estimated annual paper reporting burden range between 20,300 to 101,500 hours (35,000 to 175,000 respondents x .58 hours = 20,300 to 101,500 burden hours). This is a total burden for filing the verification forms ranges between 502,800 and 2,514,00 hours for between 1,000,000 and 5,000,000 borrowers.

The estimated time required to complete the parent income waiver form is 5 minutes per request for borrowers using the online form. This estimate includes the time to review and upload required tax forms to confirm AGI is below the eligibility threshold. Based on one response per respondent, this equates to a total estimated annual online reporting burden of 18,400 hours (230,000 respondents x .08 hours = 18,400 hours). Estimate for borrowers using the paper parent income waiver form will increase to 35 minutes to account for additional printing and mailing time. Based on one response per respondent, this equates to a total estimated annual paper reporting burden of 1,275 hours (7,500 respondents x .17 hours = 1,275 burden hours). This is a total burden for filing the parent income waiver forms of 19,675 hours ($18,400 + 1,275 = 19,675$ hours) for 237,500 borrowers (230,000 + 7,500).

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
Individual Online Application	28,950,000	28,950,000	.17 hours	4,921,500	\$22.00	\$108,273,000
Individual Paper Application	1,050,000	1,050,000	.25 hours	262,500	\$22.00	\$5,775,000
Parent Online Application	2,895,000	2,895,000	.17 hours	492,150	\$22.00	\$10,827,300
Parent	105,000	105,000	.25	26,250	\$22.00	\$577,500

Paper Application			hours			
Individual Online Verification	965,000 to 4,825,000*	965,000 to 4,825,000	.50 hours	482,500 to 2,412,500	\$22.00	\$10,615,00 to 53,075,000
Individual Paper Verification	35,000 to 175,000*	35,000 to 175,000	.58 hours	20,300 to 101,500	\$22.00	\$446,600 to \$2,233,000
Individual Online Parent income waiver	230,000*	230,000	.08	18,400	\$22.00	\$404,800
Individual Paper Parent income waiver	7,500*	7,500	.17	1,275	\$22.00	\$28,050
Annualized Totals	33,000,000	34,237,500 to 38,237,500		6,224,875 to 8,236,075		\$136,946,250 to \$181,193,650

*=not counted in the totals as these are a subset of the universe identified in the application respondent estimates.

The costs are based on the May 2021 median wage of \$22.00 for all occupations as noted here: https://www.bls.gov/oes/current/oes_nat.htm#00-0000

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

13. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**
 - **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for**

collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.**

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

- 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 Student Loan Discharge program will be active through March 31, 2024 from the date of this clearance. The Department estimates approximately \$99,900,000 in costs related to development of website forms, servicer processing, borrower support, paper form processing and communications related to this effort.

Total Annualized Capital/Startup Cost:	\$26.6 M
Total Annual Costs (O&M) :	\$ 74.7 M_____
Total Annualized Costs (current estimate):	\$101.3 M

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).

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden	+ 6,224,875 to 8,236,075		
Total Responses	+ 34,237,500 to 38,237,500		
Total Costs (if applicable)			

The increase in burden is due a newly established Federal Student Loan Discharge directed by the U.S. Secretary of Education. The annual increase of burden to individuals is an estimated total range of 6,224,875 to 8,236,075 hours based on an estimated 30,000,000 borrowers with between 34,237,500 and 38,237,500 responses.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results of this information collection will not be published.

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

The Department is not seeking this approval.

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

Tracking and OMB Number: (XX) 1845-XXXX

Revised: 10/7/2022

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