

**DEPARTMENT OF EDUCATION - JUSTIFICATION LETTER FOR EMERGENCY APPROVAL**

April 12, 2024

TO: Office of Information and Regulatory Affairs  
Office of Management and Budget

THROUGH: Strategic Collections and Clearance  
Governance and Strategy Division  
Office of Chief Data Officer  
Office of Planning, Evaluation and Policy Development  
U.S. Department of Education

FROM: Nasser Paydar,   
Assistant Secretary  
Office of Postsecondary Education  
U.S. Department of Education

RE: Request for emergency clearance by April 12, 2024 for the collection associated with calls to colleges and universities to better understand where schools are in the packaging of student aid and how the Department can better support them in moving forward.

The Department plans to engage with colleges and universities most impacted by the FAFSA delays and is **seeking emergency clearance for a call script and a survey to be used during a webinar on Friday, 4/12/2024, at 3:00 PM EST**. Given the delays in launching the form and backend processing this year, schools are facing a dramatically compressed timeline to prepare and offer aid packages to students – most notably, schools with May 1 deadlines. The Department is focused on understanding with more confidence and granularity where schools are in the process of packaging aid and how the Department can better help them move forward. In parallel, the Department also wants to ensure schools are aware of the tools and resources available to them and whether schools have considered moving back their decision date deadlines. Having a baseline of where schools are will enable the Department to better target support to schools and ensure students have access to the maximum aid possible.

This information collection is essential to the agency's mission, as ED has determined that clearance under normal notice and comment procedures is not possible, given that harm to the students is reasonably likely to result if the agency could not gather the information at this time that will inform support to institutions of higher education in making financial aid offers to students. To reduce burden on schools, we will share the survey during a currently scheduled webinar that staff had already scheduled with financial aid administrators and we will conduct conversations with schools over the phone in order to avoid additional documentation from schools.

The Department is hosting a public webinar and is kicking off one-on-one calls with 1,389 institutions on April 12, 2024, starting at 3:00 PM EST. It is critical that engagement begin as soon as possible to ensure the Department has an understanding of how many schools with early May deadlines have what they need to make financial aid offers to students, and how many still need further support. Over the last week, at the request of schools, the Department has provided several resources to assist schools in packaging aid offers as quickly as possible. It's important that the Department follows up with schools now that they have had a chance to digest the resources and understand where the remaining gaps are. We also want to check-in with schools about moving back their decision dates so that students and families have the information that they need in order to make college-going decisions. With three large state aid deadlines approaching (Texas and New Jersey are on April 15, California on May 2), we would like to check-in with schools about where they are in packaging aid as it relates to upcoming decision dates as quickly as possible so students have more time to consider their options before the deadlines pass. The financial aid award year starts July 1<sup>st</sup>—aid needs to be packaged and students need to make selections by then. Numerous schools will need to disburse aid prior to that due to summer terms.