

DEPARTMENT OF EDUCATION - JUSTIFICATION LETTER FOR EMERGENCY APPROVAL

April 24, 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 25, 2024 for the collection associated with surveying 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 follow-up survey based on the April 12, 2024 status calls that were made to schools. The survey will be sent weekly through June 28, 2024 to approximately 100-150 institutions with the goal of understanding where schools are in the process of packaging aid.** 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 the degree in which schools are 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. Obtaining this updated information now, while the information can still be used to aid students, is necessary to prevent harm to students that would occur if the Department were required to follow normal Paperwork Reduction Act clearance procedures. In particular, obtaining this information promptly will enable the Department to target support to schools and ensure students have access to the maximum aid possible.

The Department will reach out to schools and ask if they would like to opt in to the survey with the intention of sending the first survey Friday, April 26, 2024. 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 couple of weeks, 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. The financial aid award year starts July 1st—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.