

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION**

Federal Family Education Loan Program, William D. Ford Federal Direct Loan Program and
Federal Perkins Loan Program:

- General Forbearance (GEN),
- Internship/Residency, National Guard Duty, or DOD Repayment Plan Forbearance (SERV), and
- Loan Debt Burden Forbearance (SLDB)

- 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 455(a)(1) of the Higher Education Act of 1965, as amended (the HEA) provides that unless otherwise specified, loans made under the William D. Ford Federal Direct Loan (Direct Loan) Program are to have the same terms, conditions, and benefits as loans made under the Federal Family Education Loan (FFEL) Program. The benefits available to borrowers under the FFEL Program include provisions for a general forbearance (see §428(c)(3) of the HEA and 34 CFR 685.205(a)(1)) or forbearance based on service in a medical or dental internship or residency program, national guard duty, and having loans repaid under the Department of Defense's (DOD) Student Loan Repayment Program and federal education loan debt burden (see §428(c)(3) of the HEA and 34 CFR 682.211(h)(1) or 685.205(a)(3), 682.211(h)(2)(iii) or 685.205(a)(7), or 682.211(h)(2)(ii)(B)). In addition, forbearance of repayment based on federal education loan debt burden is available to borrowers from the Federal Perkins Loan (Perkins Loan) Program (see 34 CFR 674.33).

In this Supporting Statement, we use the term "forbearance forms" to refer collectively to the three forbearance forms included in this collection and use "GEN Forb" to refer to the General Forbearance Request form, "SERV Forb" to refer to the Internship/Residency, National Guard Duty, or DOD Repayment Plan Forbearance form, and "SLDB Forb" to refer to the Loan Debt Burden Forbearance form when describing each form independently.

The HEA requires borrowers to agree to the terms of a GEN Forb, a SERV Forb, or SLDB Forb in writing. In addition, the Direct Loan, FFEL, and Perkins Loan Program regulations require borrowers to provide sufficient documentation to establish that they meet the statutory and regulatory criteria for a forbearance. The GEN Forb, the SERV Forb, and

the SLDB Forb forms serve as the means by which Direct Loan, FFEL, and Perkins Loan borrowers fulfill these requirements.

The SERV Forb and the SLDB Forb forms are currently approved under OMB No. 1845-0018. The GEN Forb form is currently approved under OMB No. 1845-0031. For greater simplicity and to make it easier to maintain consistency among the various forbearance forms, the Department is consolidating the two current collections into a single collection under OMB No. 1845-0018.

The Department is requesting a revision of the currently approved forbearance forms. The proposed changes include the following:

- Streamlining the forms by eliminating duplicative and obsolete information.
 - Reordering items to present information in a more logical order that is consistent between forms.
 - Using “plain language” to present information more clearly and consistently.
 - Revising language as necessary to reflect regulatory changes made by the Final Rule published on November 1, 2022 (87 FR 65904) that eliminated the capitalization of unpaid interest following periods of forbearance effective July 1, 2023.
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 currently approved forbearance request forms are used by borrowers to request forbearance on their loans. The forms also collect the information that is required for the loan holder to determine whether the borrower meets the eligibility requirements for the requested forbearance. The forbearance request forms continue to be used for these purposes.

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 three forbearance forms are available electronically to be printed and completed for processing. However, this information collection does not allow the use of electronic submission of requests. Borrowers must either submit supporting documentation to establish their eligibility for a SERV or SLDB Forb or have a third party certify their eligibility for these forbearances. As a result, electronic submission of most forbearance requests is not feasible at this time.

GEN Forb Requests

Although in most cases a borrower must submit a forbearance request with the appropriate documentation to the loan holder, borrowers can request a GEN Forb, agree to the terms of the forbearance, and provide the required documentation to support the forbearance request through the borrower's federal loan servicer's website or on a telephone call. This reduces burden on borrowers. In such cases, the loan holder notifies the borrower that the GEN Forb has been granted.

- 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.**

There is no information already available from other sources that can be used to establish a borrower's eligibility for forbearance.

- 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.**

The frequency with which a borrower must request a forbearance is determined in accordance with statutory and regulatory requirements that are explained on each forbearance request form. Less frequent data collection would not allow loan holders to process borrower requests for forbearance.

- 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.

The Department considers comments from the public when developing the currently approved forms. The Department will request both a 60-day and a 30-day public comment period to be published in the Federal Register. This is the 60-day public comment request.

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 or will be 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 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 forms include a Privacy Act Notice that (1) informs borrowers of the statutory authority for the information collection; (2) explains that the disclosure of the information is voluntary but is required in order to qualify for a loan discharge; and (3) identifies the third parties to whom the information may be disclosed and explains the circumstances under which those disclosures may occur. The Paperwork Burden Statement and the Privacy Act Statement are included on each form. This collection is included in the Common Services for Borrowers System of Records Notice (88 FR 48449). This SORN is included in the Privacy Impact Assessment completed February 13, 2024.

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.

None of the forms request information of a sensitive nature.

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)

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 Department files this request with the same total annual number of respondents for this renewal collection as was used in the prior filings for 1845-0018. The Department adds to this request the same total annual number of respondents that was used in the prior filing 1845-0031. Due to the effects of the COVID-19 pandemic and the suspension of the collection of loans, the Department lacks sufficient data to allow for more accurate updates to the usage of these forms. There has been no change in the underlying statutes or regulations which support these request forms.

The Department continues to estimate the total annual number of respondents for this combined collection at 2,215,812 (representing the total respondents previously included in the two separate collections). The estimated response time for the GEN Forb form is 0.08 hours (5 minutes), with one response per respondent per year. The estimated response time for the SERV Forb is .25 hours (15 minutes) with one response per respondent. The estimated response time for the SLDB Forb is .20 hours (12 minutes) with one response per respondent. This equates to a total estimated reporting burden of 181,495 hours. The burden estimate for each form is calculated as follows:

GEN Forb

Estimated annual number of respondents:		2,188,770
Number of responses per borrower:	x	1
Hours per response:	x	0.08
		<hr/> 175,102 hours

SERV Forb

Estimated annual number of respondents:		19,689
Number of responses per borrower:	x	1
Hours per response:	x	0.25
		<hr/> 4,922 hours

SLDB Forb

Estimated annual number of respondents:		7,353
Number of responses per borrower:	x	1
Hours per response:	x	0.20
		<hr/> 1,471 hours

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

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 (GEN Forb)	2,188,770	2,188,770	.08	175,102	\$23.11	4,046,607
Individual (SERV Forb)	19,689	19,689	.25	4,922	\$23.11	\$113,747
Individual (SLDB Forb)	7,353	7,353	.20	1,471	\$23.11	\$33,995
Annualized Totals	2,215,812	2,215,812		181,495		\$4,194,349

For individuals we have used the median hourly wage for all occupations, \$23.11 per hour according to BLS. https://www.bls.gov/oes/current/oes_nat.htm#00-0000 Last accessed on June 18, 2024.

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

13. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**
- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**
 - **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
 - **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.**

Total Annualized Capital/Startup Cost :
Total Annual Costs (O&M) : _____
Total Annualized Costs Requested :

There are no capital/startup costs to respondents.

14. **Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

There is no significant cost to the federal government related to these forms from FFEL Program, Direct Loan, or Perkins Loan borrowers, since loan holders and servicers

distribute and process the forbearance forms, and Department servicers do not specifically charge the government for distributing these forms.

- 15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).**

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden		175,102	
Total Responses		2,188,770	
Total Costs (if applicable)			

The Department is requesting a revision of the burden associated with information collection 1845-0018 to incorporate the combination of two previously approved collections (OMB No. 1845-0018 and OMB No. 1845-0031). The total burden hours are 181,495 and the respondents/responses are 2,215,812. The difference is due to the addition of the General Forbearance form to this information collection. There has been no change in the underlying statutes or regulations which support these request forms.

- 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.

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