

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Federal Student Aid (FSA) Partner Connect System and User Access Management**

- 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.**

This is a request for a new information collection.

Federal Student Aid (FSA) Partner Connect will be replacing Student Aid Internet Gateway (SAIG) Enrollment via fsawebenroll.ed.gov. SAIG Mailboxes will remain as the access point for electronically transmitting and receiving data. FSA Partner Connect System and User Access Management allows authorized entities, including postsecondary educational institutions, institutional third-party servicers, guaranty agencies and guaranty agency (GA) servicers, Federal Family Education Loan Program (FFELP) lenders and lender servicers, federal loan servicers, and State Higher Education Agencies, to exchange data electronically with the U.S. Department of Education (Department). In order to participate, each entity must enroll for system and service access through FSA Partner Connect (fsapartners.ed.gov). The enrollment process enables the organization enrolling to create new users and select services to receive, submit, view, and/or update student financial aid data online and by batch using Department provided software – EDconnect (PC-based software) or TDClient (client software for multiple environments).

As authorized by the Higher Education Act of 1965, as amended (HEA); 20 U.S.C. 1070 *et seq.*, and in order to manage the Title IV, HEA assistance programs, the entities listed above may electronically transmit and receive data from the following FSA systems through SAIG Mailboxes by enrolling through FSA Partner Connect:

- *Free Application for Federal Student Aid*® (FAFSA®) Processing System (FPS)
- Common Origination and Disbursement (COD) System
- National Student Loan Data System (NSLDS) Online
- Electronic Cohort Default Rate (eCDR) Appeals
- Total and Permanent Disability (TPD) System
- Digital Customer Care (DCC) Customer Relationship Management (CRM) Online
- Access and Identity Management System (AIMS)
- Financial Management System (FMS)

Additionally, entities may request access to eZ-Audit and the U.S. Department of Homeland Security's Systematic Alien Verification Entitlements (SAVE) system through FSA Partner Connect to manage Title IV, HEA assistance programs.

In order to protect privacy information contained in the FSA systems, FSA has established security procedures that include requiring entities that need access to FSA systems and services to designate individuals to serve as a Primary Administrator in order to conduct transactions on behalf of the entity.

For a new postsecondary educational institution, upon approval of the *Application to Participate in the Federal Student Financial Aid Programs (e-App)*, the user who completed the e-App will be assigned as the Primary Administrator and can update the user assigned to this role at any time. If a new Primary or Secondary Administrator is assigned, the Authorizing Official (President/Chief Executive Officer [CEO] or Designee) will receive the *Authorizing Official Approval Form* to review the responsibilities of the President/CEO/Designee and provide certification/approval of the new Primary or Secondary Administrator by eSignature via DocuSign (*See Appendix A. Authorizing Official Approval Form*).

For a new organization identified through NSLDS, FSA Partner Connect will contact the Authorizing Official (President/CEO) with the *Authorizing Official Approval Form* to review the responsibilities of the President/CEO, provide First Name, Last Name, and Email Address of proposed Primary Administrator, and provide certification/approval by eSignature via DocuSign.

To create an SAIG Mailbox for an organization to electronically receive and transmit information from FSA systems, the Primary Administrator will designate a user of the Mailbox and select which Batch Services and/or Access Types should be assigned to the SAIG Mailbox. After reviewing the provided information and the *Responsibilities of FSA Partner Connect Users (See Appendix B. Responsibilities of FSA Partner Connect Users)*, the Primary Administrator will acknowledge and electronically sign on the web page. The Authorizing Official (President/CEO or Designee) will then receive an *Authorizing Official Approval Form* to review the responsibilities of the President/CEO/Designee and provide certification/approval of the enrollment by eSignature via DocuSign. At any point, the President/CEO can designate another individual to serve as a Designee and approve requests on behalf of the President/CEO by completing the *Designation of Authorizing Official Designee Form (See Appendix C. Designation of Authorizing Official Designee Form)*.

Once a Primary Administrator is established, he or she may enroll additional Administrators (Secondary Administrators) and Partner Users (*an individual within an organization who does not have administrative privileges and can have EDconnect access to an SAIG or FT Mailbox*) for selected electronic services and for access to FSA systems (*See Appendix D. FSA Partner Connect Prototype Screenshots*). To create/enroll a new user, a Primary Administrator will provide the user's First Name, Last Name, and Business Email Address and select the access types that the new user requires. After reviewing the provided information and the *Responsibilities of FSA Partner Connect Users*, the Primary or Secondary Administrator will acknowledge and electronically sign on the web page. The new user will receive an email with a link to the online FSA Partner Connect Access Form where they will be required to provide their phone number, date of birth, and Social Security Number. FSA Partner Connect collects the date of birth and last four digits of the Social Security Number from every user, with the exception of users requesting access to NSLDS who are required to provide their full nine-digit Social Security Number. After reviewing the provided information and the *Responsibilities of FSA Partner Connect Users*, the new user will acknowledge and electronically sign on the web page.

An enrolled Primary Administrator is able to –

- Electronically exchange files of financial aid data
- Access services of the Federal Direct Loan Program
- Access Grant services of the Federal Pell Grant program and the Teacher Education Assistance for College and Higher Education (TEACH) Grant program
- Access the National Student Loan Data System (NSLDS) and receive cohort default rate (eCDR) notification packages
- Access the Lender Reporting System (LaRS) to send financial reporting information to Federal

Student Aid's Financial Management System (FMS)

- Access the online NSLDS Enrollment Reporting (formerly SSCR) function for updating student enrollment and Gainful Employment data and Gainful Employment rates.
- Access the COD Website to create and modify loan and disbursement data or receive Electronic Income-Based Repayment (IBR)/Pay As You Earn/Income-Contingent Repayment (ICR) Plan Request.
- Re-disclose student's *Free Application for Federal Student Aid* (FAFSA) filing status to a state, local, or private entity designated by the Secretary of Education per written agreement.

With access to FSA systems, a Primary Administrator can –

- Complete and send electronic initial and renewal financial aid (FAFSA) applications to the FPS
- Receive electronic Institutional Student Information Records (ISIRs) from the FPS
- Send electronic corrections of applicant data to the FPS
- Exchange payment and required reporting information from the Federal Pell Grant program and the TEACH Grant program
- Receive Electronic Statements of Accounts (ESOA) from the Federal Pell Grant Program
- Exchange data with the Federal Direct Loan Program to originate loans; draw down, disburse, and reconcile loan funds; and report student status.
- Exchange data with the NSLDS
- Receive eCDR Rate Reports from Default Management

Additionally, the President/CEO (Authorizing Official) of any new State Higher Education Agencies will be required to complete and sign the *SAIG Participation Agreement for State Grant Agencies* to access data electronically that resides in the U.S. Department of Education's data systems, including receiving data on ISIRs (*See Appendix E. SAIG Participation Agreement for State Grant Agencies. Note: This form was cleared by OMB in April 2024 and no changes have been made. OMB No.: 1845-0002; Expiration Date: 1/31/2025; Effective Date: 4/28/2024.*). If the President/CEO (Authorizing Official) of an existing State Higher Education Agency changes, then the new President/CEO (Authorizing Official) will be required to sign this *Participation Agreement*.

In addition to the Higher Education Act of 1965, the Secretary published final regulations in the Federal Register (61 FR 60603) on November 29, 1996 that required institutions to participate in the electronic processes identified by the Secretary in order to improve the administration and delivery of FSA program funds to students and institutions and to protect Federal fiscal interests. Institutions must use software developed by the institution, or its vendor, in accordance with the specifications provided by the Secretary in the regulations. The Secretary believes that the savings and benefits from these electronic business processes are more than offset by any necessary initial investments by both the U.S. Department of Education and by institutions.

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.

FSA Partner Connect System and User Access Management enables entities to create new users and receive, transmit, view, and update student financial aid data available through the SAIG Mailbox system and other FSA systems and web services. The enrollment is completed on FSA Partner Connect (fsapartners.ed.gov). Information collected via the enrollment process is used by the Department to create new users associated with the entity, assign entities an SAIG Mailbox Number, and associate the

application services selected to that entity and its users.

- 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.**

Entities will use FSA Partner Connect System and User Access Management (fsapartners.ed.gov) to enroll to participate in FSA electronic services/systems currently available and update existing access to services/systems. The electronic process eliminates the need for any paper collection.

- 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.**

FSA Partner Connect System and User Access Management is the only means that Title IV, HEA participating postsecondary educational institutions and other eligible entities can use to enroll for the previously mentioned data exchange systems and services.

- 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 or other small entities 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.**

If this collection is not conducted, the Department will not be able to enroll new participants for electronic services or grant access to FSA systems. Existing participants will not be able to change their existing services and system access, including deactivating individuals who no longer need access to the services or who are no longer employed by an entity. Not having system access will adversely effect the ability to manage student aid delivery, potentially impacting student aid recipients.

- 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;**
N/A – Respondents report as needed.
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
N/A – Respondents report as they need to enroll or make changes to an enrollment.

- **Requiring respondents to submit more than an original and two copies of any document;**
N/A – Only the original copy of any documents are submitted electronically.
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
N/A – Respondents are not required to retain records.
- **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;**
N/A – This data is not collected to conduct statistical surveys.
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
N/A – This data is not collected to conduct statistical surveys.
- **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**
N/A – This data collection is supported by disclosure and data security polices consistent with the pledge.
- **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.**

FSA Partner Connect System and User Access Management collects the date of birth and last four digits of the Social Security Number from every user, with the exception of users requesting access to NSLDS who are required to provide their full nine-digit Social Security Number. Electronic authentication is conducted through the Access and Identity Management System (AIMS). Users are required to enter their FSA User ID and password to visit protected pages on FSA Partner Connect.

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 July 30, 2024, a Federal Register Notice was published (Vol. 89 FR 61103) inviting public comment on this information collection. The period ended September 30, 2024. Four comments were received and FSA's responses are listed in the below table. Changes have not been made to the forms in this collection based on these comments, however FSA has updated two typos in one form (*Responsibilities of FSA Partner Connect Users*) based on internal review. The updated forms are provided with this supporting statement. The changes made to the forms do not alter the estimated number of respondents/responses/burden hours. The Department is now requesting a 30-day public comment period be published in the Federal Register.

Comment	FSA Response
<p>“After the disastrous rollout of Partner Connect 2.0 I hope the Department has learned some lessons. Top in my mind is that it is essential the the Dep of ED engage ALL their stakeholders (institutions, TPSs, Guarantee Agencies, Loan servicers, etc.) in testing PRIOR to the rollout of these updates. It is completely unfair to stakeholders to have them do testing on a live systems (as happened with moving the E-App into Partner Connect) when they are trying to engage in essential functions.”</p>	<p>Thank you for the comment. No changes have been made to this information collection request related to this comment.</p>
<p>“Allowing for more support to students who utilize federal financial aid, including subsidized and unsubsidized loans, is never a bad idea. The more support that a student has when it comes to repaying of loans as well as how to best stay on time with payments as well as catch up when you fall behind, the more chances they have to keep their own finances afloat as a working adult. I can personally appreciate all and any avenues of support for causes of this nature.”</p>	<p>Thank you for the comment. No changes have been made to this information collection request related to this comment.</p>
<p>1. Access authorization to FSA systems for the listed categories of entities should come with a clause of relevance: e.g. if there is no guaranty issues for a specific applicant or recipient of aid, then guaranty services should not access that individual's information. An applicant's submitted application should be the indicator of relevance for the approached service to access that applicant's record. Likewise, the state is not a party to a student's applying for</p>	<p>1. Thank you for the commnet. Upon logging in to FSA Partner Connect, users must read and acknowledge the <i>Privacy Act</i> and <i>Rules of Behavior</i>. The <i>Privacy Act</i> includes, “If you use an FSA system, you are explicitly consenting to be bound by the [Privacy] Act's requirements and acknowledge the possible criminal and civil penalties for violation of the [Privacy] Act... Any officer or employee of an agency, who by virtue of his employment or</p>

<p>federal aid, so it should not go into a student's information. The Department may send the state a bulk number of federal aid recipients residing in that state. If the fed aid recipient applies for the state ed aid, then the state can collect that applicant's personal details for eligibility processing. The FSA systems should be used on a need-to-know basis.</p> <ol style="list-style-type: none"> 2. Privacy Impact Assessments for SAIG and PEPS were completed on March 2020 and November 2022 – both reflecting circumstances of then-ongoing COVID-19 pandemic time, and are no longer representative. Both assessments should be ran now to reflect the accuracy of current, non-extreme circumstances. 3. In the docket's Q+A Supporting Statement, the procedure of collecting entities' users' names, DOB, part of SSN, and contract-promises of propriety is insufficient to protect private information of applicants, students, and families. (The text's, "to protect privacy information contained in the FSA systems," is misleading.) Consequential punitive measures need to be established for misuse and improper handling of personal information from the FSA systems. A right to private action should be expressly stated. (A great deal of financial, employment, rental, and other prerequisites for social mobility depend on the security of entries, and their accuracy, in this database.) 4. The applicants, students, or their parents – those whose information gets submitted into FSA databases – should have a right to, upon request, receive a disclosure of detailed users' accesses to their information along with the purpose for accessing the information. There should be an option of obtaining a printout of all information that is assigned to the individual's name or identifier (which may include users' notes and results of processing). This should be provided by a single source, the US Department of Education, through a request form. Partner Connect System and their net of access-authorized entities, many of 	<p>official position, has possession of, or access to, agency records which contain individually identifiable information the disclosure of which is prohibited by this section or by rules or regulations established there under, and who knowing that disclosure of the specific material is so prohibited, willfully discloses the material in any manner to any person or agency not entitled to receive it, shall be guilty of a misdemeanor and fined not more than \$5,000." The <i>Rules of Behavior</i> include, "Your User ID and password are for official Department of Education business only. You are individually responsible for ensuring that data/information obtained from FSA systems is not used improperly... I further understand that violation of these rules and responsibilities may be prosecutable under local, State, and/or Federal law." No changes have been made to this information collection request related to this comment.</p> <ol style="list-style-type: none"> 2. Thank you for the comment and request. Existing Privacy Impact Assessments (PIAs) are updated when a system change creates new privacy risks or to reflect changed information collection authorities, business processes or other factors affecting the collection and handling of information in identifiable form. As stated in Item 10 below, PIAs for SAIG and PEPS were completed on March 30, 2020 and November 3, 2022, respectively. The most recent PIA for FSA Partner Connect was published on December 14, 2020. An updated PIA for FSA Partner Connect is in progress and will be published on ed.gov once approved/finalized. We have added this to Item 10 below. 3. Thank you for the comment. No changes have been made to this information collection request related to this comment. 4. Thank you for the comment. The System of Records Notices (SORNs) listed in Item 10 below include instructions for determining whether a record exists regarding you in the system ("Notification Procedures") and contesting the content of a record in the system
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<p>whom are private businesses, are free to create own rules and obstacles to avoid disclosures or upset their completeness. Also, a complaint procedure needs to be established for the grievances of individuals-owners of the information in the database(s). Q+A Supporting Statement's item 7 needs to be updated to require all users to retain all records created by them related to individuals' info for the same amount of time as the IRS recommends people keep their financial records. This is a way for individuals to evidence fumbles caused by users of FSA systems to a third party.</p> <ol style="list-style-type: none"> 5. Because the Department chose to have FSA run through authorizing thousands of users to access and use applicants', students', and families' information, it essentially added conditions to receive federal program benefits – this is outrageously exploitive. Therefore, the Department needs to expend for information protection measures. 6. In the interest of transparency, Department should not reserve the right to designate other entities, including “private”, for “re-disclos[ure] [any of student information, including] student’s Free Application for Federal Student Aid (FAFSA) filing status” through undisclosed additional “written agreement[s]”. Rule making procedure requires public review. 7. There is no known way for an entity to prevent breaches of its database. 8. Institutions should not be directed to “use software developed by the institution, or its vendor” (as it expands the number and breach risk of databases with personal info of aid applicants), instead of the Department’s provided unified, defined in use and purpose one. 9. If the cost of providing such software is prohibitive “to protect Federal fiscal interests”, then the costly transitioning to a new systems should not be undertaken. The obviously efficient and economic way to 	<p>pertaining to you (“Contesting Record Procedures”). Additional information on system record retention can be found in the SORNs listed in Item 10 below (“Policies and Practices for Retention and Disposal of Records”). No changes have been made to this information collection request related to this comment.</p> <ol style="list-style-type: none"> 5. Thank you for the comment. Information on the Department’s information protection measures can be found in the System of Records Notices (SORNs) and Privacy Impact Assessments (PIAs) listed in Item 10 below. For institutions/organizations, Authorizing Officials and/or their Designees must electronically sign the <i>Authorizing Official Approval Form</i>, which includes information protection measures that the institution/organization must adhere to. Users that gain access to FSA Partner Connect must electronically sign the <i>Responsibilities of FSA Partner Connect Users</i>, which includes information protection measures that the individual must adhere to. No changes have been made to this information collection request related to this comment. 6. Thank you for the comment. No changes have been made to this information collection request related to this comment. 7. Thank you for the comment. The forms within this package (<i>Authorizing Official Approval Form</i>, <i>Designation of Authorizing Official Designee Form</i>, and <i>Responsibilities of FSA Partner Connect Users</i>) provide guidance to institutions/organizations on how to report an unauthorized disclosure or breach of student applicant information or other sensitive information (such as personally identifiable information) to the Department. No changes have been made to this information collection request related to this comment. 8. Thank you for the comment. No changes have been made to this information collection request related to this comment. 9. Thank you for the comment. No changes have
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<p>provide federal education aid is through a kiosk-style algorithm, processing application form fields against eligibility criteria and sending the resulting amount of aid to the school of attendance. Same with loans.</p> <p>10. Instead of having the reliable student-oriented “Student Aid internet Gateway (SAIG)” adjusted, the Department chose to introduce a new, contractor-oriented “Partner Connect” of many, including ambiguous “institutional third-party servicers” that are essentially permitted to self-regulate.</p>	<p>been made to this information collection request related to this comment.</p> <p>10. Thank you for the comment. Institutional Third-Party Servicers refer to the entities or individuals that enter into a contract with an institution and administer any aspect of an institution's participation in the Title IV programs on behalf of an eligible institution. No changes have been made to this information request related to this comment.</p>
<p>The old system of processing FERPA applications, SAIG, has worked for a long time and should be continued as an option to the applicant of federal aid.</p> <p>Last year, the trial version of FSA caused problems nationwide. Malfunctions in unrolling any new product on a mass scale are foreseeable. There was no safety net provided by ED to offset this, and millions of phone calls for help from college-applying families were ignored. [https://www.gao.gov/products/gao-24-107407]</p> <p>The Congress rule to simplify FAFSA form was to increase access to education. Department’s choices in implementing the rule achieved the opposite. Enrollment has decreased by 40% in Arizona alone [https://kjzz.org/news/2024-06-11/fafsa-problems-have-been-felt-more-in-arizona-than-in-other-states] and lower-income students and minorities were especially harmed.</p> <p>(When enrollment of poor enrollees decrease, it results in positive statistics for the Department: poor enrollees represent a lower rate of staying and graduating college. So without them, the rate increases, suggesting improvement.)</p> <p>Pacifying user-applicants with the familiar interface of SAIG Mailboxes (from the system that was reliable) as the access point, while having the rest of processing and reporting done through Partner Connect (the system that caused disasters) is misleading and deceiving because it puts up a facade of reliability. The department needs to illustrate that the cost-benefit analysis of</p>	<p>Thank you for the comment. SAIG Mailboxes will remain as the access point for electronically transmitting and receiving data. FSA Partner Connect will be replacing the functions of managing enrollment to access SAIG Mailboxes (fsawebroll.ed.gov). No changes have been made to this information collection request related to this comment.</p>

<p>continuing with a proven-to-be-bad Partner Connect system is more favorable to students' completion of post-secondary education than reverting to the working SAIG. Additionally, the Department does not put forth any founded assurances that, going forward, Partner Connect will function as intended.</p> <p>For those reasons, the Department needs to make available a safety net, an alternative way to apply for federal education aid, to ensure that it gets processed reliably. The dependable SAIG system could be such alternative. This would fulfill the Department's duty that, "agency shall identify ... available alternatives to direct regulation, ... providing information upon which choices can be made by the public".</p> <p>It is important that the burden of stress and expense to applicants' families, time spent on ED's non-working system, and the the long-term impact on the applicant's ability to make a living be calculated, as it was a burden imposed upon society by ED and its bad choices in implementing the Congress's directive, and in the absence of any failsafe - just as with this proposal.</p>	
<p>N/A (Internal Review)</p>	<p><i>In Appendix B. Responsibilities of FSA Partner Connect Users:</i></p> <ul style="list-style-type: none"> • Page 1 – Corrected the full spelling of DHS-SAVE acronym (U.S. Department of Homeland Security's Systematic Alien Verification Entitlements (SAVE) system) • Page 2 – Removed the "NN" typo at the end of the fourth bullet under Additional Requirements of the Primary Administrator

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

The Department of Education does not allow any payments or gifts 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.

System of Records Notices titled “Student Aid Internet Gateway (SAIG), Participation Management System” (18-11-10) and “Postsecondary Education Participants System (PEPS)” (18-11-09) were published on March 1, 2018 (83 FR 8855) and September 11, 2018 (83 FR 45912), respectively. Privacy Impact Assessments were completed for SAIG on March 30, 2020; FSA Partner Connect on December 14, 2020; and PEPS on November 3, 2022. An updated Privacy Impact Assessment for FSA Partner Connect is in progress and will be published on [ed.gov](https://www.ed.gov) once approved/finalized. The citations that authorize the collection of the information are Executive Order 9397 and Executive Order 13478.

- 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.**

There are no questions of a sensitive nature.

- 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**

¹ Requests for this information are in accordance with the following Department 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)

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.

Based on the previous SAIG Enrollment information collection request, FSA estimates that it takes a respondent/organization approximately 20 minutes (0.33 hours) to complete enrollment for system and/or user access (including enrolling new users) and approximately 10 minutes (0.167 hours) to update their organization's system and/or user access on FSA Partner Connect.

Breakdown of Reporting Burden by Respondent Type:

Private Sector – Business or Other For-Profit: Postsecondary Educational Institutions, Institutional Third-Party Servicers, FFELP Lenders and Lender Servicers

0.33 hours x 6,500 new system and/or user access enrollments = 2,167 hours

0.167 hours x 18,700 updated system and/or user access enrollments = 3,123 hours

Subtotal of Respondents/Responses and Burden Hours for Business or Other For-Profit

of Respondents/Responses = 6,500 + 18,700 = 25,200 respondents/responses

of Burden Hours = 2,167 + 3,123 = 5,290 hours

Private Sector – Not-For-Profit: Postsecondary Educational Institutions, Guaranty Agencies and Guaranty Agency Servicers, Federal Loan Servicers

0.33 hours x 3,000 new system and/or user access enrollments = 1,000 hours

0.167 hours x 8,700 updated system and/or user access enrollments = 1,453 hours

Subtotal of Respondents/Responses and Burden Hours for Business or Other For-Profit

of Respondents/Responses = 3,000 + 8,700 = 11,700 respondents/responses

of Burden Hours = 1,000 + 1,453 = 2,453 hours

Public Sector – State, Local, Tribal Government: Postsecondary Educational Institutions, State Higher Education Agencies

0.33 hours x 3,000 new system and/or user access enrollments = 1,000 hours

0.167 hours x 8,700 updated system and/or user access enrollments = 1,453 hours

Subtotal of Respondents/Responses and Burden Hours for Business or Other For-Profit

of Respondents/Responses = 3,000 + 8,700 = 11,700 respondents/responses

of Burden Hours = 1,000 + 1,453 = 2,453 hours

All Respondents/Responses

of Respondents/Responses = 25,200 + 11,700 + 11,700 = 48,600 respondents/responses

of Burden Hours = 5,290 + 2,453 + 2,453 = 10,196 hours

The annualized cost to respondents was estimated using the above figures to complete a form and a median annual salary of \$47,600 (\$23 per hour) for a College Financial Aid Counselor (obtained from <https://salary.com>). 10,196 hours (calculated above) x \$23 per hour = \$234,508 annualized cost.

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)
For-Profit Institution	25,200	25,200	See above	5,290	\$23	\$121,670
Private Institution	11,700	11,700	See above	2,453	\$23	\$56,419
Public Institution	11,700	11,700	See above	2,453	\$23	\$56,419
Annualized Totals	48,600	48,600	---	10,196	---	\$234,508

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 :

N/A – There are no start-up costs.

- 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.**

Based on actual costs incurred in the most recent contract years and projections for future contract years, FSA Partner Connect estimates approximately \$15,000,000 for annual operations and maintenance of the system, with approximately \$3,000,000 (20%) allocated to annual operations and maintenance of the System and User Access Management component.

- 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		10,196 hours	
Total Responses		48,600	
Total Costs (if applicable)			

This is a new information collection. We anticipate 48,600 annual responses from 48,600 respondents for a total of 10,196 hours (6,029 hours for new enrollments and 4,167 hours for updated enrollments). The estimated annual total cost is \$234,508 for all respondents.

- 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.**

Results of this collection of information 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 expiration date for OMB approval of the information collection will be displayed.

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

The Department is not requesting an exception.