# **SUPPORTING STATEMENT**

# **FOR PAPERWORK REDUCTION ACT SUBMISSION**

2025-26 FAFSA Beta Testing Phases 2-4

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 U.S. Department of Education (the Department) is requesting an emergency clearance for this new information collection.

Section 483 of the Higher Education Act of 1965, as amended (HEA), mandates that the Secretary of Education “…shall produce, distribute, and process free of charge common financial reporting forms as described in this subsection to be used for application and reapplication to determine the need and eligibility of a student for financial assistance...”.

Federal Student Aid (FSA), an office of the Department, subsequently developed an application process to collect and process the data necessary to determine a student’s eligibility to receive Title IV, HEA program assistance. The regular application process involves an applicant’s submission of the Free Application for Federal Student Aid (FAFSA®). After submission and processing of the FAFSA form, an applicant receives a FAFSA Submission Summary, providing a summary of the processed data they submitted on the FAFSA form. The applicant reviews the summary, and, if necessary, will make corrections or updates to their submitted FAFSA data. Institutions of higher education listed by the applicant on the FAFSA form also receive a summary of processed data submitted on the FAFSA form, which is called the Institutional Student Information Record (ISIR). The appropriate state higher education agency will also receive the ISIR data to coordinate eligible state funds to be provided to the applicant via the institution of higher education.

The Department will conduct three additional beta testing periods (Beta 2–4) for the 2025-26 FAFSA process beginning in October 2024 to prepare for general availability of the form in December 2024. The implementation of the 2025-26 FAFSA process is being conducted through a phased beta process to ensure a stable and reliable platform for submission of required information for all filers, contributors, and other financial aid community users such as high schools and high school districts, institutions of higher education, state agencies and community-based organizations (CBOs) who assist college bound students.

Beta 2-4 will expand the number of participating organizations including high school districts, institutions of higher education, state agencies and community-based organizations (CBOs) who assist college bound students. Beta 2–4 will also increase the number of students and their contributors to further stress test the system and allow for refinements of the process.

1. **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 collection will utilize two forms (1) the 2025-26 FAFSA 2-4 Organizational Interest Form and (2) the 2025-26 Beta Student Signup Form. Through these two forms, the Department seeks to increasing the numbers of applicants and their contributors, which will, in turn, provide a further stress test on the system and to review the effectiveness of changes made based on prior beta testing.

The **2025-26 FAFSA 2-4 Organizational Interest Form** will allow the Department to select the additional entities to participate in the 2025-26 FAFSA Beta testing. Beta 2-4 will continue to work with college access CBOs and expand participation to high schools, high school districts, state agencies, and institutions of higher education. Ideal participating organizations will be able to recruit progressively larger numbers of students to participate in a FAFSA session in mid-October and who will all apply to at least one college. That college and the relevant state financial aid agency will receive and process ISIRs shortly after the FAFSAs are submitted.

The **2025-26 Beta Student Signup Form** is exclusive to the applicants and their contributors as identified by the participating Beta 2-4 organizations. This form will be used to capture a minimal amount of information necessary to aid in ensuring that the applicants and any contributors have a StudentAid.gov account (also known as an FSA ID) with an email address. This information will be used to identify participants in the Beta Phases 2-4 and allow for the FAFSA Processing System to accept the FAFSA test form from eligible participants only.

Through the use of high-touch support to these participants, Beta 2-4 will continue to identify system issues and work to eliminate them before the FAFSA is released to millions of students and reduce the challenges and frustrations that the public encountered with the launch of the 2024-2025 form.

1. **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 submission of the application forms will be done electronically to minimize burden and expedite filing time. The forms will be made available at and submitted to https://studentaid.gov/h/apply-for-aid/fafsa

1. **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 duplication of information. The Department does not have all of the requested information available in its systems.

1. **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.**

This collection does not impact small businesses.

1. **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.**

Without this information collection, the Department could not as expeditiously proceed with the refinements and improvements to the 2025-26 FAFSA application and processing system that this testing will provide, and this would adversely impact students who rely on federal financial aid as well as the institutions of higher education that support these students. Any additional delay in providing access to the FAFSA form would increase the potential for public harm through delayed access to student financial aid and the possibility of decreasing postsecondary enrollment.

1. **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.**

There are no special circumstances as noted above associated with this information collection.

1. **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 applicants to identify major system issues before the FAFSA is released for use by all students and to reduce the challenges and frustrations encountered with an earlier version of the FAFSA form.

The Department is requesting emergency clearance and OMB approval of our foregoing public comment in order to recruit organizational participants and FAFSA applicants as soon as possible.

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

There are no payments or gifts for the completion and/or submission of the application.

1. **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]](#footnote-3) 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 Beta Phase 2–4 Interest Form for Organizations will include a notice that informs applicants that any Personally Identifiable Information (PII) may be shared with contractors to assist the Department in conducting the Beta testing programs. The Department believes that the requested information is directory information.

The 2025-26 Beta Student Sign-up Form will include a Privacy Act Statement. FSA will not make any disclosure of the information to agencies or individuals outside this department unless previously stated in the Routine Uses section of the System of Records Notice for the Person Authentication Service (PAS), Vol. 88 FR 48817, as required by law or written consent accompanies the request. A Privacy Act statement is included as part of the account creation process.

1. **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 as identified above in this collection of information.

1. **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**](https://www.bls.gov/oes/current/oes_nat.html) **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.**

For the 2025-26 FAFSA Beta 2-4, the Department expects applications from 100 community-based organizations (CBOs), 100 high schools, including high school districts and state and local agencies focused on FAFSA completion and 500 institutions of higher education. We anticipate that it will take each interested entity 60 minutes (1 hour) to complete the participation form for a total of 700 hours.

For Beta 1-4, the Department expects to have 45,000 applicants complete the Secondary Interest Form which confirms the applicants and their contributors have the required StudentAid.gov account (also known as an FSA ID username). Only applicants participating of the Beta Testing, who will be identified by the approved organizations and provided with the Interest Form access by the Department, will have their FAFSA processed during the Beta 1-4. We anticipate it will take each applicant 5 minutes (0.08 hours) to sign in, complete and submit the required information on the Student Signup Form for a total of 3,600 hours.

Students who participate in the Beta 1-4 testing utilizing the FAFSA will have the individual burden accounted for under the FAFSA information collection, OMB Control Number 1845-0001 and will not be included separately in this information collection.

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 | 45,000 | 45,000 | 0.08 | 3,600 | $23.11 | $83,196.00 |
| For-Profit Institutions | 50 | 50 | 1 | 50 | $29.67 | $1,483.50 |
| Private Institutions | 285 | 285 | 1 | 285 | $29.67 | $8,455.95 |
| Public Institutions | 365 | 365 | 1 | 365 | $29.67 | $10,829.55 |
| Annualized Totals | 45,700 | 45,700 |  | 4,300 |  | $103,965.00 |

Bureau of Labor Statistics (BLS), U.S. Department of Labor, *Occupational Outlook Handbook*, School and Career Counselors and Advisors,  
at <https://www.bls.gov/ooh/community-and-social-service/school-and-career-counselors.htm> (visited *August 22, 2024*).

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 September 3, 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.***

1. **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 start-up costs.

1. **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 are no additional costs to the Federal government.

1. **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** |  | 4,300 |  |
| **Total Responses** |  | 45,700 |  |
| **Total Costs (if applicable)** |  |  |  |

This is a new collection. The anticipated 4,300 burden hours is based on 45,700 responses from 45,700 respondents in all of the Beta 2-4 testing phases.

1. **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 the collected information will not be published for tabulation or publication.

1. **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.

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

Exceptions to the certification requirement are not requested for this information collection.

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) [↑](#footnote-ref-3)