

**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 policies 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 October 8, 2024, a Federal Register Notice was published (Vol. 89 FR 81502) inviting public comment on this information collection. The period ended November 7, 2024. Seven comments were received and FSA's responses are listed in the attached table. Changes have not been made to the forms in this collection based on these comments. The Department is now requesting a 30-day review and comment period by OMB.

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 attached table. Changes were not made to the forms in this collection based on these comments, however FSA updated two typos in one form (*Responsibilities of FSA Partner Connect Users*) based on internal review. The changes made to the forms did not alter the estimated number of respondents/responses/burden hours.

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 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

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)

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 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).

- 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.