Comment ID #	Comment Description	A-123C Responses
ED-2025-SCC-0517-008 Colorado Higher Ed Governing Board Response Pg. 1	Our understanding is the proposed change would transfer the reporting responsibility of the SFA cluster audit sample reporting from the auditor, as required in the Single Audit Uniform guidance, to the auditee. The sampling information is part of audit workpapers, which the institutions (the auditee) do not have access to. Colorado statue, Section 2-3-103(3) C.R.S., required audit workpapers to be confidential. Therefore, the Colorado Office of the State Auditor would not be permitted to share the work papers with the auditee for the purpose of complying with this proposed requirement.	FSA understands that auditees do not have access to the information collected by the auditor. The proposed change is intended to require auditors to continue to complete and provide to FSA a similar reporting form that they have been completing and providing since 2019, and does not request that the institutions (i.e., auditee) collect any information. FSA will update the language accordingly to clarify the roles of the auditor and institutions ensuring no additional burden to the collection/reporting method.
	Further, the proposal estimates the time for each institution to complete the proposed form as 20 minutes per institution. This estimate significantly underestimates the time that would be required to complete this form even if institutions had the information necessary.	FSA will update the language to clarify the roles of the auditor and institutions. FSA is not requesting that institutions complete or provide the form to FSA.
	Historically, the committee has not approved a request to release audit work papers to the public. As such, Colorado public institutions would have the information to comply with the proposed	FSA will update the language to clarify the roles of the auditor and institutions. None of the information that is being collected through this request is being released to the

	requirement.	public, nor does any of the information that is being requested contain PIIA or is confidential.
	If the request to release the audit work papers was approved, it would take significantly longer than 20 minutes per institution to comply with the proposal. Once the information was available, the institutions would need to complete the form, have it reviewed internally, and submit it to the Office of the State auditor to verify the information was accurate and complete. This process could take several hours if not day to complete.	FSA will update the language accordingly to clarify the roles of the auditor and institutions. The population, sampling, and finding information that is being requested is already collected by the auditor and included within the audit workpapers, so the only work that is needed is done by the auditor, not the institutions (i.e., auditee).
	The proposed changes does not increase efficiency, and is not cost effective and Colorado institutions would not currently be able to comply due to statutory limitations	The proposed changes increase efficiency and is cost effective and are applicable under the audit access provisions in 2 CFR 200.517(b) and Title IV regulations at 34 CFR 668.23(e)(1)(ii), which give FSA the authority to collect certain information from the single audit in order for FSA to carry out its oversight responsibilities with regard to improper payments. FSA strives to uphold the sacred trust of taxpayers as we work to support the goals of Congress and the administration, so

		for FSA to spend additional taxpayer dollars to perform sampling procedures and testing that is already being performed by highly skilled, and qualified state and independent auditors separately would be duplicative and would not be cost effective to the American taxpayer.
ED-2025-SCC-0517-0007 NACUBO Improper Payments Comments Pg. 1	Under the Payment Integrity Information Act of 2019 (PIAA), the Department of Education (ED) must estimate the prevalence and amount of improper payments for its major programs, such as Pell Grants and Direct Lending. However, the new information request for higher education institutions is procedurally misplaced. The document accompanying the Paperwork Reduction Act (PRA) notice in the Federal Register appears to be designed for auditors, rather than institutions.	The request for information within the Federal Register is not misplaced and as it already contains requirements that auditors must follow in the CFR. Additionally, the information that is being requested is not new. Auditors have been completing a nearly identical reporting template since 2019. The proposed change is intended to require auditors to continue to complete and provide to FSA a similar reporting form that they have been completing and providing since 2019, and does not request that the institutions (i.e., auditee) collect any information. FSA will update the language accordingly to clarify the roles of the auditor and institutions.
	The request also introduces new	FSA will update the language to

	information element beyond the current SFA audit requirements, thus an OMB CS update developed under the framework of the Single Audit Act would be more appropriate and effective mechanism than a new PRA collection.	clarify the roles of the auditor and institutions. The population, sampling, and finding information that is being requested is already collected by the auditor and included within the audit workpapers, so the only work that is needed is done by the auditor, not the institutions (i.e., auditee). FSA agrees that an update in the OMB Compliance Supplement (CS) would be more prudent. If you would like to work with OMB and FSA to implement a new requirement in the 2027 OMB CS, please let us know.
ED-2025-SCC-0517-0007NACUBO Improper Payments Comments Pg. 1 - 2	Question #2 in the section on Supporting Statement for Paperwork Reduction Act Submission states “once the annual audit is conducted, the independent auditors provide the results to the institution and the institution must submit the supplemental information to the Department.” Further, Question #3 adds, “much of the information is being derived directly from their [institutions of higher education] annual compliance audit report.” These assertions are not accurate. The annual data needed for auditors to complete the form are not readily available	FSA understands that institutions do not have access to the information collected by the auditor. The proposed change is intended to require auditors to continue to complete and provide to FSA a similar reporting form that they have been completing and providing since 2019, and does not request that the institutions (i.e., auditee) collect any information. FSA will update the language accordingly to clarify the roles of the auditor and institutions.

	at most institutions. Collecting and aggregating that data would significantly exceed ED's twenty-minute burden estimate. Further, additional time to coordinate with auditors will be necessary and the likelihood of higher audit fees will further increase the burden on institutions.	
	For the reasons noted above, we respectfully request that this information request be reconsidered and that ED work with OMB and representatives of the higher education and auditing communities to determine whether the OMB Compliance Supplement provides a more effective and less duplicative vehicle for meeting PIIA reporting requirements	FSA agrees that an update in the OMB Compliance Supplement (CS) would be more prudent. If you would like to work with OMB and FSA to implement a new requirement in the 2027 OMB CS, please let us know.
ED-2025-SCC-0517-0006 AICPA Response Docket ED-2025-SCC-0517 Improper Payments ICR Pg. 1	We appreciate the Department's commitment to estimating improper and unknown payments in accordance with the Public Law 116–117, Payment Integrity Information Act of 2019 (PIIA) and OMB Circular A–123, Part C (A–123C). However, as we have stated in previous comments to the Department and the Office of Management and Budget (OMB), the information requested previously through	FSA understands that this request is outside of the Single Audit Act and hope to work with OMB on a revised Single Audit Act to include requirements so that FSA does not need a separate mechanism to collect basic sample, population, and finding information that is already being collected through audit workpapers. However, until a new Single Audit Act

	OMB's Compliance Supplement and now in this proposed Information Collection Request (ICR) is beyond the scope of the requirements for single audits in the Uniform Guidance (Title 2 U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (referred to as the Uniform Guidance)). For example, the Uniform Guidance does not require a single audit for all non-federal entities, but only those with total federal awards over a certain amount. Also, Uniform Guidance does not require auditors to report detailed information about sampling when there are no findings. Therefore, the Department is adding requirements outside of the regulatory process.	is released, FSA must comply with PIIA reporting requirements, and given available departmental resources, available data, and program characteristics for the Federal Pell Grant (Pell) and William D. Ford Federal Direct Loan programs, FSA determined a Sampling and Estimation Methodology Plan (S&EMP) that in part, requires basic sample, population, and finding information, is the best approach to satisfy PIIA requirements. The legal and administrative requirements that necessitate the collection of this information are the audit access provisions in 2 CFR 200.517(b) and Title IV regulations at 34 CFR 668.23(e)(1)(ii), which the Department has concluded gives it the authority to collect certain information from the single audit in order for the Department to carry out its oversight responsibilities with regard to improper payment reporting. FSA strives to uphold the sacred trust of taxpayers as we work to support

		the goals of Congress and the administration so for FSA to spend additional taxpayer dollars to perform sampling procedures and testing that is already being performed by highly skilled, and qualified state and independent auditors separately would be duplicative and would not be cost effective to the American taxpayer.
ED-2025-SCC-0517-0006 AICPA Response Docket ED-2025-SCC-0517 Improper Payments ICR Pg. 2	As such, the use of non-statistical attribute sampling is not appropriate to extrapolate or project known monetary errors to the entire population to determine the magnitude (amount) of potential errors. Only the specific costs identified as errors during testing, known as questioned costs, are reported in audit findings. Therefore, using known questioned costs and non-statistical attribute sampling to extrapolate a potential amount of improper payments may result in misleading conclusions about the magnitude of improper payments within the SFA programs.	FSA appreciates the AICPA's concern, but its statisticians have considered both points raised. FSA statisticians considered the usage of non-statistical attribute sampling when they developed the S&EMP and took appropriate precautions. Additionally, FSA does not use questioned costs in the extrapolation. The data derived from compliance audits that is used to estimate improper payments for FSA must also be reconciled and meet other criteria to validate the information, such as a completed Final Audit Determination (FAD), a completed reporting template from the auditor, among others. The auditors performing Single Audits

		have been providing a reporting template to FSA since 2019 when similar requirements were included in the OMB Compliance Supplement (CS).
	Additionally, as indicated in previous comments to the Department and as stated in Section 200.1 of Uniform Guidance, “questioned costs are not improper payments until reviewed and confirmed to be improper payments as defined in OMB Circular A-123 Appendix C.” A final determination on whether the questioned costs from audit findings are improper payments may not have occurred before the Department uses the information to calculate improper payments, which may result in misleading conclusions about the magnitude of improper payments within the SFA programs.	FSA appreciates the AICPA's concern and considered this when developing its S&EMP. FSA does not use questioned costs from audit findings to identify improper payments. FSA uses amounts once a final audit determination is made and reconciles amounts with auditors through their reporting submissions or via emails/meetings to confirm accuracy.
	Requested Information is Not Included in the Compliance Audit Report. As noted in Item #1 of the Supporting Statement, the information the Department intends to use in executing FSA’s Sampling and Estimation Methodology Plan (S&EMP) is not reported with the compliance audit. We agree with	FSA will revise this to more accurately represent where the data resides (e.g., within the audit workpapers).

	this observation and emphasize that the requested data resides solely in the independent auditors' working papers, which are not shared with institutions unless specifically requested. However, Supporting Statement #3 inaccurately states that "much of the information is being derived directly from their annual compliance audit report." This statement misrepresents the source of the data and may lead to confusion regarding its availability and accessibility.	
ED-2025-SCC-0517-0006 AICPA Response Docket ED-2025-SCC-0517 Improper Payments ICR Pg. 2-3	Conflicting Information on Responsibility for Completing the Information Template. The proposed ICR contains inconsistent information regarding whether institutions or independent auditors are responsible for completing and submitting the Information Template. Supporting Statement #2 and #12 indicate the independent auditor will provide results to the institution, which will then submit the completed template to the Department. However, Supporting Statement #12 also states that the auditors will email the Excel spreadsheet to the Department. Furthermore, the Information Template itself appears to be written for auditors, as	FSA will update the language to clarify the roles of the auditor and institutions. The proposed change is intended to require auditors to continue to complete and provide to FSA a similar reporting form that they have been completing and providing since 2019, and does not request that the institutions (i.e., auditee) collect any information.

	evidenced by language such as "auditor's assertion to the information provided" in row 7 and references in Items #2 and #3 to "….the auditor must provide the following".	
ED-2025-SCC-0517-0006 AICPA Response Docket ED-2025-SCC-0517 Improper Payments ICR Pg. 3	Institutions Do Not Have Access to the Requested Information. Supporting Statements #2, #3 and #12 indicate the institution will submit the requested information to the Department. However, as previously mentioned, this information resides solely in the independent auditors' working papers, which are not shared with institutions. Historically, auditors have submitted this data directly to the Department in accordance with the OMB's Compliance Supplement. Shifting the responsibility from auditors to institutions introduces a significant risk of inaccurate or incomplete submissions. Institutions may not engage their auditors in completing the Information Template, leaving auditors unaware of how the template was completed or whether it accurately reflects audit findings.	FSA will update the language accordingly to clarify the roles of the auditor and institutions. The proposed change is intended to require auditors to continue to complete and provide to FSA a similar reporting form that they have been completing and providing since 2019, and does not request that the institutions (i.e., auditee) collect any information. The institutions do not need to validate the information. FSA does not believe that this introduces a significant risk of inaccurate or incomplete submissions and has confidence that the highly skilled, and qualified auditors performing the compliance audits are capable of completing the form accurately and completely.
	Certain Information in the ICR Exceeds the Requirements of Uniform Guidance and	FSA will update the language accordingly to clarify the roles of the

	Auditing Standards. Item #5 and the final two sentences of Item #4 in the Information Template request details that auditors are not required to report as audit findings under the Uniform Guidance in section 200.516(a) or applicable auditing standards. Such information, if documented at all, would reside solely in the independent auditors' working papers - information that institutions do not have access to, as previously noted. In addition, the request in row 7 of the Information Template for the "auditor's assertion to the information provided" is outside the context of the auditor's opinion for an audit or other type of professional engagements (e.g., examination or agreed-upon procedures) and cannot be provided.	auditor and institutions. The proposed change is intended to require auditors to continue to complete and provide to FSA a similar reporting form that they have been completing and providing since 2019, and does not request that the institutions (i.e., auditee) collect any information. Additionally, independent auditors are required to conduct the annual compliance audit in accordance with 2 C.F.R 200 (Uniform Guidance). FSA is suggesting that auditors are either providing a brief statement or sign off such as "Based on the information provided, *Auditor* can state that the details presented in the information are accurate and reliable." The documentation that the auditor is providing is derived from information gathered to prepare the compliance audit, so if it is sufficient to perform a compliance audit, the information should be sufficient enough to provide a brief statement or sign off.
	Estimate of Burden is Too Low for	FSA responds as follows to each

	Institutions and Auditors. Supporting Statement #12 estimates the total burden for this data collection effort at just 20 minutes per institution. While this may reflect the time required for institutions to submit the requested information to the Department, it significantly underestimates the actual effort involved. Institutions must first obtain the necessary data from their independent auditors and complete the Information Template—tasks that require substantially more time and coordination. Moreover, the estimate does not account for the time auditors will need to support this effort. Auditors do not typically document sampling information in the format requested by the Department's Information Template. To ensure the required data is captured appropriately, auditors must be informed of the Department's information request at the outset of the audit. Additionally, institutions may seek assistance from their auditors to 1) complete the Information Template, given that auditors possess the relevant data; and 2) respond to any follow-up questions from the Department regarding the submitted information.	comment in this paragraph: *"Institutions must first obtain the necessary data from their independent auditors and complete the Information Template—tasks that require substantially more time and coordination."* FSA will clarify that the auditors should complete the form. Institutions do not need to complete the form. *"Moreover, the estimate does not account for the time auditors will need to support this effort. Auditors do not typically document sampling information in the format requested by the Department's Information Template. To ensure the required data is captured appropriately, auditors must be informed of the Department's information request at the outset of the audit.* "FSA recommends that auditors take steps to incorporate completing this form into their processes when drawing their sample sizes. Per discussions with auditors, this information is already being captured in audit workpapers. Therefore, the burden for auditors to complete three to four tables for an institution

		should not take more than 20 minutes on average if the auditor is already collecting or documenting sample and population information in their audit workpapers. Additionally, this PRA notice serves to provide the auditors this requirement prior to the onset of the audit. Auditors have been informed of this requirement through the OMB Compliance Supplement since 2019, which has been before the onset of the previous 5 compliance audit cycles so this information is not new. *"Additionally, institutions may seek assistance from their auditors to 1) complete the Information Template, given that auditors possess the relevant data; and 2) respond to any follow-up questions from the Department regarding the submitted information."*(1) As stated earlier, institutions do not need to complete the reporting template. (2) FSA will consider the need for follow-up and the estimate of 20 minutes of burden.
ED-2025-SCC-0517-0005 National State Auditors	The PRA notice creates uncertainty about whether auditors or institutions are	FSA will update the language accordingly to clarify the roles of the

Association Pg. 1 - 2	responsible for compiling and submitting the required sampling information. Contrary to the Department's assertion that "much of the information is being derived directly from [the auditee's] annual compliance audit report", this information actually resides within the auditor's workpapers. These workpapers are not accessible to auditees, and in many states, these workpapers are confidential under state statute. As such, institutions would be unable to complete the requested forms without auditor involvement or approval, placing auditors in conflict with state law and their business practices.	auditor and institutions. The proposed change is intended to require auditors to continue to complete and provide to FSA a similar reporting form that they have been completing and providing since 2019, and does not request that the institutions (i.e., auditee) collect any information.
	In addition to assuming workpapers could be shared with auditees, the proposal requires auditors to "confirm" the accuracy of information submitted by auditees without specifying the level of assurance or the applicable auditing standards governing this assertion. Without clear guidance, this request could result in inconsistent practices and confusion about the nature of the auditor's responsibility for the accuracy of information compiled by the auditee beyond the reporting requirements in Uniform Guidance.	FSA will clarify the term to "confirm" the accuracy of information submitted by auditees. FSA is simply requesting that auditors perform quality assurance and quality checks on the information between their audit workpapers and the reporting template.

	The estimated preparation time of 20 minutes per institution substantially understates the effort required to extract, reconcile, and review this information. Compiling this data involves professional judgment and multiple levels of review, often taking several hours depending on the size and complexity of the audit. This would be the case even without the requirement for the auditor to "confirm" information submitted by the auditee who could make errors or add additional information. We estimate the time needed to be at least six times greater than the Department's estimate per auditee	FSA recognizes that audit work is time consuming, however the steps needed to complete this PRA notice involves completing between one to five tables depending on the type of funds that the institution receives and the results of the compliance audit. Per discussions with auditors, this information is already being captured in audit workpapers, so FSA recommends that auditors take steps to incorporate completing this form into their processes when drawing their sample sizes. The burden for auditors to complete tables for an institution should not take more than 20 minutes on average if the auditor is already documenting sample and population information in their audit workpapers. The time of 20 minutes on average considers whether compliance audits had findings and the complexities of those findings. For example, for an institution that receives Pell and Direct Loan funding and does not have findings, FSA is requesting eight figures: sample size and dollar amounts (Pell), population

		size and dollar amounts (Pell), sample size and dollar amounts (Direct Loan), population size and dollar amounts (Direct Loan). Completing the reporting form in this scenario should take less than 20 minutes, and certainly not an hour and forty minutes, as suggested in this comment.
ED-2025-SCC-0517-0005 National State Auditors Association Pg. 2	Shifting the reporting responsibility from auditors to institutions would not reduce burden. This redundancy will increase administrative costs for both parties and complicate audit coordination. Rather, it would introduce an additional reporting step—requiring auditors to provide data to auditees, who would then transmit it to the Department—which will negatively impact timeliness. Additionally, this redundancy will increase administrative costs for both parties and complicate audit coordination.	FSA will update the language accordingly to clarify the roles of the auditor and institutions. The proposed change is intended to require auditors to continue to complete and provide to FSA a similar reporting form that they have been completing and providing since 2019, and does not request that the institutions (i.e., auditee) collect any information.
ED-2025-SCC-0517-0005 National State Auditors Association Pg. 2	We respectfully urge the Department to clarify the intended roles of auditors and institutions, ensure that any information requests are compatible with existing state laws, and reassess the time and cost estimates associated with this process. Rather than pursuing a new method for	FSA has and will consider the points raised by NSAA. FSA must comply with PIIA reporting requirements, and given available departmental resources, available data, and program characteristics for the Pell Grant and Direct Loan programs, FSA

	requesting information, the established practice of the Department requesting information directly from auditors when reasonable and necessary, consistent with 2 CFR 200.517(b), should be maintained. We do not believe routinely collecting data beyond the scope of the requirements in Uniform Guidance is necessary or reasonable.	determined a Sampling and Estimation Methodology Plan (S&EMP) that in part, requires basic sample, population, and finding information, is the best approach to satisfy PIIA requirements. For FSA to spend additional taxpayer dollars to perform sampling procedures and testing that is already being performed by highly skilled, and qualified state and independent auditors separately would be duplicative and would not be cost effective to the American taxpayer. The legal and administrative requirements that necessitate the collection of this information are the audit access provisions in 2 CFR 200.517(b) and Title IV regulations at 34 CFR 668.23(e)(1)(ii), which the Department has concluded gives it the authority to collect certain information from the single audit in order for the Department to carry out its oversight responsibilities with regard to improper payment reporting.
ED2025-SCC-0517-0004	"Patriotic education" should not be a	FSA strives to uphold the sacred trust

	consideration when approving grants - we want the most accurate and honest history being taught to our children, not something that has been 'white washed' and sanitized. That won't help us learn from the mistakes of our past and do better in the future.	of taxpayers as we work to support the goals of Congress and the administration