SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

Generic Clearance for FSA Customer Satisfaction Surveys and Focus Groups Master Plan

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 Higher Education Amendments of 1998 established Federal Student Assistance (FSA) as the first federal Performance-Based Organization (PBO). The legislation specified that one purpose of the PBO is to improve services to students and other participants in the student financial assistance programs authorized under title IV of the Higher Education Act of 1965, as amended (HEA), including making those programs more understandable to students and their parents. To do that, FSA has committed to providing all people with customer service that matches or exceeds the best service available in the private sector. The legislation's requirements establish an ongoing need for FSA to be engaged in an interactive process of collecting information and using it to improve program services and processes.

Surveys to be considered under this generic information collection will include those surveys that improve customer service or collecting feedback about a service provided. The results of these customer and topic surveys will help FSA managers to plan and implement program improvements as well as other customer satisfaction initiatives.

Focus groups that will be considered under the generic clearance will assess customer satisfaction with a direct service, or will be designed to inform a customer satisfaction survey FSA is considering.

Surveys that have the potential to influence policy will not be considered under this generic clearance. This clearance will also allow ED to submit more than one survey if the respondent type is the same (as a bundle submission).

FSA requests that this collection also be used to gather data in accordance with OMB Circular A-11 Section 280 to ultimately transform the experience of its customers to improve both efficiency and mission delivery and increase accountability by communicating about these efforts with the public. Currently one survey, under the Always on and Post-Transaction title, is approved as an A-11 survey. For purposes of the A-11 surveys, FSA will only submit a collection for approval under this generic clearance as an A-11 request if it meets the following conditions:

- Information gathered will be used only internally for general service improvement and program management purposes and is not intended for release outside of the agency (if released, procedures outlined in Question 16 will be followed);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions;
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study;
- The collections are voluntary;
- The collections are low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and are low-cost for both the respondents and the Federal Government;
- The collections are non-controversial and do not raise issues of concern to other Federal agencies;
- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future; and
- With the exception of information needed to provide remuneration for participants of focus groups and cognitive laboratory studies, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

If these conditions are not met, the Agency will submit the information collection request to OMB for approval through the normal generic information collection process under this collection.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation.

The types of collections that this generic clearance covers include, but are not limited to:

- Small discussion groups
- Focus Groups of customers, potential customers, delivery partners, or other stakeholders
- Cognitive laboratory studies, such as those used to refine questions or assess usability of a website;
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys)

FSA is requesting a revision of the approved information collection. In order to enhance the quality of data collection FSA is updating on the surveys improved, user-friendly language. Proposed updates to the surveys are attached in a separate document titled *Survey Updates Combined_ 1845-0045*. We do not expect these changes will impact the

overall length or completion time of the surveys. We estimate FSA will continue to conduct surveys and focus groups and request continuation of the current allowance of 400,000 hours. We are also requesting continuation of 8,050,000 respondents. This will allow for FSA to continue conducting surveys and focus groups submitted under this generic clearance as well as allow for new surveys or focus groups that are not already listed.

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.**

One of the primary objectives in the PBO legislation was to ensure that all entities and individuals directly served by FSA receive the highest quality of service, comparable to that service delivered by private organizations. These individuals and entities are defined as our "customers."

In FSA, senior management has defined our ultimate customer as the students who attend or plan to attend postsecondary institutions including secondary students, postsecondary and graduate students, and adult learners. Additionally, FSA provides funds and services to parents, state education agencies, institutions of higher education, accreditation agencies, lenders, guaranty agencies, national special interest groups with an interest in postsecondary education, contractors, grantees, and individuals seeking employment with FSA.

To be responsive to the needs of these customers, the expectations and requirements of these groups will need to be understood. The customer satisfaction surveys and focus groups to be conducted by FSA under this clearance will be used to assess these needs at a level that matches or exceeds the best service available in the private sector.

FSA has established a process where customer satisfaction is regularly monitored and measured. The results will assist FSA in the planning and decision-making processes to improve the quality of FSA's products and services. Results from surveys and focus groups will be used to measure against established baseline standards and for measuring FSA progress toward defined goals. This will be a continuous process of measuring customer satisfaction and then using that information to redefine FSA processes and programs. Without this process, FSA will have no basis for planning and implementing program improvements and other customer satisfaction initiatives.

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.

There are neither legal nor technical obstacles to the use of technology in these information collection activities. The determination to use technology, and which technology to use, will be based on the type of information collected and the utility and the availability of specific technology to each respondent in a proposed customer satisfaction survey.

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.**

   The information to be supplied on these surveys will not be duplicated on any other information collection. Since initial OMB approval of FSA's umbrella clearance for customer satisfaction surveys, FSA has worked to ensure the streamlining in number of surveys, number of questions, and type of questions proposed for approval. FSA continues to review the proposed surveys to verify that the information sought is not already available and that the survey is part of a coordinated FSA-wide customer satisfaction program.

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.**

   The information collected in these surveys will represent the minimum burden necessary to evaluate customer satisfaction with FSA programs and processes.

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.**

   Without a regular program of customer satisfaction surveys, FSA will not be able to achieve the commitment to provide FSA's customer with high level service. These surveys and focus groups will be coordinated to insure that most individual respondents will not be asked to respond to more than one survey instrument or to participate in more than one focus group. The total number of surveys and the schedule for those surveys will be monitored by the Office of the Chief Operating Officer of FSA.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
   - **requiring respondents to report information to the agency more often than quarterly;**
   - **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
   - **requiring respondents to submit more than an original and two copies of any document;**
   - **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
   - **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
   - **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
   - **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
   - **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

   These surveys will be consistent with all the guidelines in 5 CFR 1320.5, especially those provisions in subsection (g) which require that a statistical survey be designed to produce results that can be generalized to the universe of study. There are no special circumstances that would cause this information collection to be conducted in an unusual or intrusive manner. All participation will be voluntary. Should FSA need to deviate from the requirements outlined in 5 CFR 1320, individual justification will be provided to OMB on a case-by-case basis.

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 August 26, 2025, a Federal Register was published (Vol. 90, No. 163, page 41551) inviting public comment on this information collection. The Department received one non-substantive comment. No changes have been made to the collection or the burden assessment. This is now the request for the 30-day notice be published in the Federal Register initiating the 30-day public comment period.

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

The standard will be no payment or gift to respondents for participation. If any payments or gifts are proposed, FSA will submit specific justification for each proposed payment as part of the completed package submitted to OMB.

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.**

[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)

The survey and focus group instructions will provide all necessary assurances of confidentiality to the respondents. Although there is no requirement for such an assurance in statute, the quality of this type of information requires respondent candor and anonymity.

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 will be no questions of a sensitive nature in these customer satisfaction surveys. If any are required, FSA will submit justification for each question used as part of the completed package submitted to OMB.

12. Provide estimates of the hour burden for this current information collection request. The statement should:

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. Use this site to research the appropriate wage rate. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

The respondent burden averages from five (5) minutes to thirty (30) minutes per response for each survey, dependent on the individual survey. This estimation has been

based on previous surveys generated by FSA in the past years. The respondents are estimated to average 90 minutes in each focus group discussion.

Each survey respondent will submit only one response per survey. Based on recent usage, FSA estimates approximately responses 7,248,870 annually with a total estimated burden of 330,202 hours annually. FSA will continue to keep tracking the total burden in order to accurately report burden year to year. The average hourly cost per respondent time is estimated to be $22, for a total of $7,264,444 (330,202 x $22 = $7,264,444).

Each member of a focus group is expected to spend an average of 1.5 hours per group. FSA estimates that there will be approximately 15 segmented focus groups held each year with an average of thirty participants per group for an average of 450 participants. The annual total paperwork burden for the focus groups is estimated to be 675 hours (15 groups x 30 participants x 1.50 hours). The average hourly cost per participant time is estimated to be $50. The total cost for each participant for each focus group discussion is $75.00, for a total of $50,625 (675 hours x $75.00 = $50,625).

FSA estimates there may be an additional 800,680 new respondents and 69,123 additional burden hours submitted under this generic clearance for new surveys or focus groups that are not already listed. The average hourly cost per respondent time is estimated to be $22, for a total of $1,520,706 (69,123 x $22 = $1,520,706).

The total estimates of **responses** are 8,050,000 (7,248,870 (surveys) + 450 (focus groups) + 800,680 (additional) and total **burden hours** is 400,000 (330,202 + 675 + 69,123).

The estimated total of the hour burden of the collection of information equals hours for an estimated cost of $8,835,775 ($7,264,444 + $50,625 + $1,520,706).

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	8,049,550	8,049,550	0.0496083	399,325	$22.00	$8,785,150
Individual focus group	450	450	1.5	675	$75.00	$50,625
For-Profit Institutions						
Private Institutions						
Public						

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)
Institutions						
Annualized Totals	8,050,000	8,050,000		400,000		$8,835,775

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

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

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

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

There is no increased cost burden to respondents except for costs under number 12.

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.

The estimated annualized cost required to read and evaluate the surveys and focus group discussions by FSA is estimated to be 5,000 hours. Given an average hourly rate of $38.00 per hour, the total cost to the Department is estimated to be $190,000.

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			
Total Responses			
Total Costs (if applicable)			

We are requesting an extension without change of the 8,050,000 respondents/responses and the 400,000 burden hours that were part of the most recently updated umbrella clearance package. FSA will continue to track the accurate burden in order to accurately report burden year to year.

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.

As the information is collected, the FSA offices will evaluate and share it with any other program managers, support service managers and employees to whom it is relevant. Based on the results of some surveys and focus groups, other surveys and focus groups will be commissioned and the comparative results will be evaluated and tracked over time to determine the type and rate of progress FSA is making.

A brief summary, of how each of the requirements of Part B of the SF-83 Supporting Statement is met, will be included in the completed submissions that are conveyed to OMB for the official file on this clearance. If any survey methodology deviates from the OMB guidelines, FSA will submit a specific justification for that action as part of the completed package submitted to OMB.

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.

FSA will include the OMB Control Number and collection expiration date on each survey and provide it will all focus group documentation.

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

FSA is not requesting an exception to the certification statement identified in Item 20, “Certification for Paperwork Reduction Act Submissions, “ of OMB Form 83-I.