

ED-2025-SCC-1240-0004

- **Comment Summary:** Comment states that the Department's claim of holding an annual Fall conference is inaccurate for 2025, and the in-person format of the early-2026 conference will hinder broad participation and feedback.
- **Response:**

Thank you for your comment. We appreciate your review of the submission.

The observation regarding the Department's fall conference concerns a separate activity and is not related to this Information Collection Request. Because the conference referenced in your comment does not affect the scope, methodology, or burden of this data collection, no changes to the package are necessary. We welcome any additional feedback specific to the data collection itself.

ED-2025-SCC-1240-0005

- **Comment Summary:** Comment makes four substantive points:
 - **Clarity of Reporting Expectations:** Requests clearer examples and terminology alignment to ensure consistent interpretation of reporting requirements.
 - **Responsible Use of Reported Information:** Urges transparency about how sensitive data will be used and protected.
 - **Documentation Parameters:** Seeks clearer guidance on what supporting documentation is sufficient, including whether summaries or attestations qualify.
 - **Burden and Internal Coordination:** Notes that actual burden exceeds the estimated 42 minutes because information must be gathered across multiple offices.
- **Response:**

We appreciate your submission and thank you for taking the time to provide detailed feedback for our consideration. Your four main points are responded to here individually:

- **Clarity of Reporting Expectations:** While every effort has been made to align terminology across the TPS data form, the E-App, and eZ-Audit, we welcome notification of any wording that may still be unclear. We also agree that supplemental guidance could support consistent interpretation and will consider developing a User Reference Guide modeled on the *User Reference Guide to the E-App*.
- **Responsible Use of Reported Information:** All data reported through this inquiry is stored securely on Department-operated systems in accordance with

established federal and Department security standards, including access controls ensuring that sensitive information is accessible only to authorized personnel. The Department uses the information solely to support its regulatory responsibilities, including determining continued institutional eligibility for Title IV program participation.

- **Documentation Parameters:** While the documentation requirements applicable to the TPS data form or the E-App are already listed within those respective instruments, we recognize the value of clearer guidance and will consider the feasibility of issuing a User Reference Guide for the TPS data form to promote consistency and efficiency in submissions.
- **Burden and Internal Coordination:** The estimated 42-minute reporting burden is based on survey responses and reflects our current understanding of the average time needed to complete the TPS data form. Updated burden estimates validated by multiple users are welcome and will be reviewed to determine whether an adjustment is appropriate.

ED-2025-SCC-1240-0006: Middle States Commission on Higher Education (MSCHE)

- **Comment Summary:** Comment warns that supposed expansion of TPS data collection would duplicate existing accreditor oversight and create unnecessary burden for institutions.
- **Response:**

Thank you for your review and input. The Information Collection Request (ICR) at issue is a reinstatement of OMB Control Number 1845-0130 for the Third-Party Servicer (TPS) data form; it does not add new fields or expand the scope of reporting. Rather, it continues the long-standing collection of data elements previously approved and used by the Department.

We agree that oversight should avoid unnecessary paperwork burden where possible. However, current regulations require the Department to collect the information requested on the TPS data form, and our role in higher education oversight includes carrying out this collection.

We welcome continued coordination with institutional accreditors to ensure that TPS data reporting remains focused on statutory Title IV requirements while avoiding overlap with accreditation processes.