SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

DCIA Aging and Compliance Data Requirements for Guaranty Agencies

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 Department of Education (the Department) is requesting OMB approval for a reinstatement without change 1845-0160 DCIA Aging and Compliance Data Requirements for Guaranty Agencies (GAs).

   The Department is required to report to the U.S. Department of the Treasury (Treasury) the status and condition of its non-tax debt portfolio in accordance with the requirements of the Debt Collection Improvement Act of 1996 (DCIA) and the Digital Accountability and Transparency Act of 2014 (DATA Act). Receivable information is reported to Treasury via the Treasury Report on Receivables and Debt Collection Activities (previously called the TROR).

   The Department is unable to prepare an accurate and compliant Treasury Report without additional data from its GAs. The continuing guidance requires the GAs to submit to the Department:
   - age debt according to DCIA;
   - report the eligibility of DCIA-aged debt for referral to the Treasury Offset Program (TOP); and
   - report compliance with Form 1099-C reporting.

   Neither the regulations or the data requirements have changed since the last extension of this ICR in 2023.

   The legal authority for collecting this information is:
   - DCIA; and
   - The DATA Act.

   DCIA: https://www.congress.gov/104/plaws/publ134/PLAW-104publ134.pdf
   DATA Act: https://www.congress.gov/113/plaws/publ101/PLAW-113publ101.pdf

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.**

The purpose of the collection is to:

- communicate debt aging requirements per DCIA;
- capture detailed information pertaining to the status and collection of Federal Family Education Loan (FFEL) Program loans authorized by the Higher Education Act of 1965, as amended (HEA) and defined by Title IV of the HEA (Title IV) that is not currently available via the Guaranty Agency Financial Report (GAFR) approved under 1845-0026;
- enable the Department to report complete and accurate data to Treasury, as required; and
- permit the Department to monitor GA compliance with DCIA.

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.**

   The GAs will continue to submit the data via email in a comma-separated values (CSV) file format. The Department will consolidate the data received into an Excel template with built-in controls.

   The Department will continue to look at other ways to incorporate technology into the submission process (e.g. electronic forms). At no point during the submission process will GAs use a paper form to submit this information.

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 data requested is not available elsewhere nor in the format needed to measure DCIA compliance (e.g., debt on the GAFR is not aged per DCIA).

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.**

Collection of this information does not involve small businesses or other small entities.

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 the Department is unable to collect the additional data from the GAs, the Department would be unable to accurately measure DCIA compliance nor fulfil its reporting requirement to Treasury for the GA-held portion of its debt portfolio.

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.**

   Requirements require the GAs submit three separate Data Sets – Write-Off Data, Aging Data, and Disposition Data. The Aging Data and Disposition Data are required monthly; the Write-Off Data is required annually.

   The Aging and Disposition Data Sets are based upon a GA's monthly GAFR submission and would be due the same time as the monthly GAFR submission. The new data collection will be conducted in accordance with guidelines in 5 CFR 1320.6.

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 December 29, 2025, a Federal Register Notice was published (Vol. 90, No. 245, page 60692) inviting public comment on this collection. No comments were received.

This is now the request for 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.**

   There are no 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**

[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)

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.

No assurance of confidentiality has been provided to respondents. The information collected here is available to the public under the Privacy Act of 1974 and the Freedom of Information Act.

Additionally, data included on the Treasury Report is disseminated to Congress, OMB, the Department's Chief Financial Officers, and officials and representatives of Federal and state organizations, private sector organizations and the public.

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 are no questions of a sensitive or private nature with this data request.

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.

There are 11 GAs servicing student loan debt on behalf of the Department. All 11 GAs are private state agencies.

The Requirements require that the GAs submit three separate Data Sets – Write-Off Data, Aging Data, and Disposition Data. The Aging and Disposition Data are required monthly; the Write-Off Data is required annually. The estimated annual hour burden for each Data Set is provided below.

Data Set		Average Annual Hour Burden
1	Write-Off Data Set	66
2	Aging Data Set	264
3	Disposition Data Set	396
Total		726

The total annual burden has been determined to be approximately 726 hours. This was determined by multiplying the estimated number of GAs (11) times the number of submissions per GA (25) times the amount of time needed to collect, complete and review the three Data Sets for accuracy.

Number of GAs	11
Number of Submissions	x 25
Total Annual Data Sets	275
Number of Write-Off Data Sets (Annually)	11
Number of Aging Data Sets (Annually)	+ 132
Number of Disposition Data Sets (Annually)	+ 132
Total Annual Data Sets	275
Monthly Write-Off Data Hour Burden	6
Monthly Aging Data Hour Burden	2
Monthly Disposition Data Hour Burden	3
Total Burden Hours	**726**

The estimated annual cost to the public is approximately $48,613. This was determined by multiplying the amount of time it takes to collect, complete, review and submit the Data Sets (726 hours) by an average hourly wage of $66.96 per hour.

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	N/A	N/A	N/A	N/A	N/A	N/A
For-Profit Institutions	N/A	N/A	N/A	N/A	N/A	N/A
Private Institutions	11	275	2.64	726	$66.96	$48,613
Public Institutions	N/A	N/A	N/A	N/A	N/A	N/A
Annualized Totals	**11**	**275**		**726**		**$48,613**

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 are no additional costs from those reported in question 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.

There are no additional costs to the Federal government.

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			-462
Total Responses			-175
Total Costs (if			

applicable)			

This is a request for a reinstatment with a change in burden and respondents due to adjustment in our estimates. Currently there are only 11 GAs that are required to respond to this collection; the currently approved collection is based on 18 GAs. Because of this, there is a decrease of 462 burden hours and a decrease of 175 total responses.

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.

The Department does not plan to share/publish any information received from the GAs directly with the public. However, the data will be summarized and formatted for use in management reports and for the Department's quarterly Treasury Report submission.

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 Department is not seeking this approval.

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

The Department is not requesting any exceptions to the "Certification for Paperwork Reduction Act Submissions".