**SUPPORTING STATEMENT A**
**FOR PAPERWORK REDUCTION ACT SUBMISSION**

Federal Student Aid User Experience Design Research Generic Clearance

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 reinstatement without change of the **1845-0159 Federal Student Aid User Experience Design Research Generic Clearance**. Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. To continuously ensure that our programs are effective and meet our customers' needs, the Department of Education's office of Federal Student Aid (FSA) seeks a reinstatement of its OMB Fast Track Process (5-day) generic clearance 1845-0159 to continue collecting qualitative feedback.

   This collection of information is necessary to enable FSA to gather customer and stakeholder qualitative feedback efficiently and timely, in accordance with our commitment to improving service and information delivery. By qualitative feedback, we mean information that provides useful insights on perceptions and opinions but is not statistical surveys that yield quantitative results generalizable to the population of study. The insights collected from our customers and stakeholders will help ensure that users have a consistent, efficient, and satisfying experience with FSA's services and products. This feedback will provide insights into customer or stakeholder perceptions, experiences, and expectations, provide an early warning of issues with customer care and communications, or focus attention on areas where technology, design, or changes in training might improve self-service delivery and distribution of information. These collections will allow for ongoing, collaborative, and actionable communications between FSA and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program delivery.

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.**

   Improving FSA's products and services requires ongoing assessment of performance and input from the public. FSA has been working toward the goal of fully enabling an enterprise-wide, FSA-branded digital platform, an omni-channel customer care experience across phone, chat, chatbot, email, text, social media, and consistent and personalized information delivered through customers' preferred communication

channels. Under this clearance, FSA will collect, analyze, and interpret information gathered through information clearances to identify strengths and weaknesses of current service delivery and make improvements based on feedback. The solicitation of feedback will target areas such as consistency, personalization, intuitiveness, accessibility, ease of use, proactive communication, and efficiency. The collection of this information will allow FSA to deliver clear, consistent information and readily accessible self-service options at every stage of the student aid lifecycle.

FSA will only submit a new information collection (IC) for approval under this generic fast-track clearance if it meets the following conditions:

- Information gathered will only be used internally for general service improvement and program management purposes and is not intended for release outside of FSA (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 [1];
- 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 usability testing and other user experience evaluation methods, personally identifiable information (PII) such as first name and email is collected only to the extent necessary (e.g., scheduling purposes) and is not retained.

If these conditions are not met, FSA will submit an information collection request to OMB for approval through the normal PRA process.

To obtain approval for an information collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation (e.g., survey instrument). The submission will have automatic approval, unless OMB identifies issues within 5 business days.

[1] As defined in OMB and agency Information Quality Guidelines, “influential” means that “an agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions.”

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

- Design surveys
- Structured focus groups (if more than 9 participants)
- Stakeholder and user interviews (if more than 9 participants using structured questionnaires)
- Qualitative customer satisfaction surveys and feedback
- User recruitment screener questionnaires

Usability testing is generally exempt from PRA review and approval and, in most cases, will not be cleared through this generic clearance. FSA has a robust usability testing practice in place and will leverage this generic clearance for review and approval of ongoing user research questionnaires for usability test recruitment purposes.

FSA's Digital Service team in the Chief Technology Office has established a manager/managing entity to serve for this generic clearance and will conduct an independent review of each information collection to ensure compliance with the terms of this clearance prior to submitting each collection to OMB.

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.**

   In most cases, FSA will collect information electronically and/or use online collaboration tools such as Microsoft Teams, dScout, and Optimal Workshop to reduce burden and cost for the Federal Government.

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.**

   Efforts to identify duplication involve a comprehensive review of existing data sources within the FSA and from other external entities. FSA ensures that the information collected is not already available or has not been previously gathered for similar purposes. This review process involves consulting with different departments, analyzing current databases, and verifying that the specific information needed is unique and critical for the current objectives. By doing so, FSA avoids redundancy, ensures efficiency, and leverages existing resources effectively. If any similar information is found, it is evaluated to determine if it can be modified or adapted to meet the current requirements without necessitating a new collection effort.

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.**

   Small business or other small entities are unlikely be involved in these efforts, and FSA will minimize the burden on those that are involved with information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments that follow plain language best practices.

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 these types of feedback, FSA will not have timely information to adjust its products and services to meet customer needs. Direct user feedback is essential to delivering clear, consistent, and effective information and readily accessible self-service options throughout the student aid lifecycle. The absence of this feedback would hinder FSA's ability to make data-driven improvements and adaptations, ultimately reducing the quality and effectiveness of its services. Furthermore, it would impede the agency's capacity to respond swiftly to emerging issues or changing user requirements, potentially leading to user dissatisfaction and decreased efficiency in service delivery. This could also result in higher costs in the long run due to the need for more significant overhauls or corrections that could have been avoided with regular feedback.

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.**

In all cases the information collected will be voluntary and will not be used for statistical purposes. Therefore, there are no special circumstances.

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 30, 2025, a Federal Register Notice (Vol. 90, N. 246, page 61128) inviting public comment on this collection. No public comments were received for this collection.

   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.**

FSA will generally not provide payment or other forms of remuneration to respondents of its various surveys and questionnaires such as usability testing screener questionnaires.

In the case of usability testing (generally exempt from PRA and not part of this clearance) and other human-centered design methods (e.g. tree testing, card sorting, contextual inquiry, etc.), FSA's contractors may provide stipends of up to $75 for sessions lasting over one hour, when such information collections include hard-to-reach groups such as defaulted and delinquent borrowers and non-traditional student groups such as single parents.

In all cases of compensation related to an information collection, FSA will provide OMB with justification in the request for clearance of these specific activities.

**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.[2] 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.**

If a confidentiality pledge is deemed useful and feasible, FSA will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If FSA includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

**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**

[2] 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)

**information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions will be asked that are of a personal or 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.**

The annual number of burden and individual responses is provided in the table below.

| **Estimated Annual Reporting Burden** | | | | |
|---|---|---|---|---|
| Type of Collection | No. of Respondents | Annual Frequency per Response | Hours per Response | Total Annual Hours |
| Generic design surveys or user research screener questionnaires | 290,000 | Once | .25 hours | 72,500 |
| Focus groups or interviews | 2,475 | Once | 1 | 2,475 |
| **Totals**: | 292,475 | -- | -- | 74,975 |

| Estimated Annual Burden and Respondent Costs Table | | | | | | |
|---|---|---|---|---|---|---|
| **Information Activity or IC (with type of respondent)** | **No, of Respondents** | **No. 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)** |
| **Individuals** — *Generic design surveys or user research screener questionnaires* | 245,000 | 245,000 | See above | 61,250 | $32.66 | $2,000,425 |
| **Individuals** — *Focus groups or interviews* | 2,475 | 2,475 | See above | 2,475 | $32.66 | $80,833.50 |
| **For-Profit Institutions** — *Generic design surveys or user research screener questionnaires* | 15,000 | 15,000 | See above | 3,750 | $32.66 | $122,475 |
| **Private Institutions** — *Generic design surveys or user research screener questionnaires* | 15,000 | 15,000 | See above | 3,750 | $32.66 | $122,475 |
| **Public Institutions** — *Generic design surveys or user research screener questionnaires* | 15,000 | 15,000 | See above | 3,750 | $32.66 | $122,475 |
| **Annualized Totals** | 292,475 | 292,475 | -- | 74,975 | -- | $2,448,683.50 |

**Average hourly wage for all occupations, Occupational Employment and Wage Statistics, Bureau of Labor Statistics, 2024*

Any additional information collection requests under this generic clearance will indicate burden hours per respondent. The totals above indicate the total burden hours we plan to collect under the generic clearance. FSA anticipates any focus groups or interviews to be only with individuals (students, parents, borrowers—FSA's primary customers), but also anticipates institutions of higher education (private, public, or for-profit) will also be surveyed occasionally for design feedback for partner systems and student experiences.

***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 :**

No costs are anticipated for record keepers or respondents.

**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 is no anticipated additional cost 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** | | | |
| **Total Responses** | | | |
| **Total Costs (if applicable)** | | | |

This is request for a reinstatement without change of this existing information collection. FSA anticipates need for 292,475 annual respondents and continued need for an estimated 74,975 annual burden hours.

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 results of this information collection 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 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".