

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
William D. Ford Federal Direct Loan Program (DL) Regulations**

- 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) amends the William D. Ford Federal Direct Loan (Direct Loan) Program regulations issued under the Higher Education Act of 1965, as amended (HEA), to implement changes made to the regulations in § 685.102, 682.215, 682.405, 685.200, 685.201, 685.203, 685.204, 685.205, 685.208, 685.209, 685.21, 685.211, 685.219, 685.22, 685.221, 685.303.

The One Big Beautiful Bill Act (OBBBA) signed into law on July 4, 2025, made statutory changes to Direct Loans that impact regulatory requirements found in this information collection. This is a request for a revision of the current information collection to include the new regulatory requirements.

- 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.**

Schools, loan servicers, and guarantee agencies use the requirements of this collection to comply with Direct Loan regulations and properly administer Title IV programs.

- 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 no prohibitions to the use of technology.

- 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.**

This information is not duplicated on any other information collection.

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.**

This collection does not impact small businesses.

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.**

Schools, loan servicers, and guarantee agencies would not be able to implement the changes to the regulation that come from OBBBA if the collection and record keeping requirements were not met. Students would not be able to enroll in any loan programs or loan repayment plans.

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.**

This information collection does not require any 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.

The Department developed these regulations after conducting negotiated rulemaking with the affected entities and other parties. The comment period for this information collection package will run concurrently with the Notice of Proposed Rulemaking.

- 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 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.**

There is no assurance of confidentiality provided to institutions for the submission of this information.

- 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 nature in this collection.

- 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.**

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)

- **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.**

§ 685.102 Definitions

Proposed § 685.102 would add the following new definitions: expected time to credential; graduate student; professional student; program length. Institutions will be required to update their internal systems and policies to bifurcate the definition of graduate or professional student; however, we expect the associated burden to be minimal. Institutions already differentiate graduate students from baccalaureate students under longstanding policy; the proposed burden change for distinguishing between graduate and professional student would create minimal burden on schools.

To comply with proposed § 685.102, institutions will be required to update their definitions of expected time to credential and program length. We believe the burden to conform with the new definitions to be minimal as the proposed definitions serve to provide consistency and clarity of these terms rather than change them.

Collectively, institutions would be required to review the new definitions, update internal policies and procedures, modify systems, perform basic testing, and train staff. We believe there will be an increase in burden of approximately 300 hours per institution to comply with these regulations.

§ 682.215 Income-based repayment

Proposed 682.215(b) would amend the terms and conditions of the IBR plan to remove any references to partial financial hardship to conform with changes from the OBBB Section

82001(f)(1)(B). This will decrease burden on borrowers as they will no longer be required to demonstrate a partial financial hardship to apply for an income-driven repayment plan, including the income-based repayment plan. Updates to the 1845-0102 Income Driven Repayment Plan Request for the William D. Ford Federal Direct Loans and Federal Family Education Loan Programs will be completed and made available for comment through full public clearance packages before being made available for use by the effective date of the regulations.

Likewise, loan servicers will no longer have to determine that the borrower meets the PFH requirement before placing a borrower in the income-based repayment plan nor will they be required to make annual redeterminations of PFH status.

The proposed elimination of the PFH requirement will reduce burden on loan servicers. When PFH was first implemented the Department estimated there would be an increase of 90,286 burden hours on loan servicers. Because these PFH determinations will no longer be required under this proposed regulation, the Department would remove all 90,286 hours of burden in full.

§ 685.201 Obtaining a loan

Before July 1, 2026, for a graduate or professional student to apply for a Direct PLUS Loan, the borrower would complete a FAFSA and submit it in accordance with instructions in the application. The borrower would also complete the Direct PLUS Loan Request and the Direct PLUS Loan MPN.

Proposed 685.201 would align the regulations with the changes to section 81001(1)(C) of the OBBB which amends section 455(a)(3)(C) of the HEA by terminating graduate and professional students' access to the Direct PLUS Loan program for any period of instruction beginning on or after July 1, 2026 (except for those current students who qualify for the interim exception).

By discontinuing the Grad PLUS loan program for new students and those who do not qualify for the interim exception for certain students, the Department's proposes removing an entire category of loan processing requirements for servicers and institutions. This will reduce burden accordingly.

In the 2024-25 award year there were 2,020 title IV eligible schools who originated and disbursed at least one Grad PLUS loan. Of those, 124 proprietary schools made an average of 465 Grad PLUS loans; 1,341 private schools made an average of 279; and 555 public schools made an average of 413 Grad PLUS loans.

Title IV eligible schools may still participate in the Direct PLUS loan program. Proposed 685.201 would disqualify Graduate and Professional students from eligibility, but parents of

dependent undergraduate students remain eligible to borrow Direct PLUS loans. Therefore, the loan program will not be entirely eliminated. Because of this, we estimate there would be a 620-hour reduction in burden per Title IV institution participating in the Direct PLUS loan program. This would remove approximately 1,252,400 hours of burden from this regulatory collection, 1845-0021 William D. Ford Federal Direct Loan Program (DL) Regulations.

Additional reductions in burden on borrowers will be assessed to OMB 1845-0103 William D. Ford Federal Direct Loan Program, Federal Direct PLUS Loan Request for Supplemental Information and OMB# 1845-0129 PLUS Adverse Credit Reconsideration Loan Counseling. These updates will be completed and made available for comment through full public clearance packages before being made available for use by the effective date of the regulations.

§ 685.220 Consolidation

Section 82001(e) of the OBBB made statutory changes to permit defaulted borrowers to consolidate their loans for the purpose of obtaining access to the IBR or Repayment Assistance Plan plans to fix the default. The Department proposes to amend § 685.220 to conform with these statutory changes. Before July 1, 2028, defaulted borrowers may consolidate to gain access to the IBR and/or ICR plans. On or after July 1, 2028, defaulted borrowers may consolidate to gain access to the IBR plan or the Repayment Assistance Plan.

Proposed 685.220 would ensure defaulted borrowers are able to consolidate into the Direct Loan program and defines which repayment plans they have access to, including the Repayment Assistance Plan. Increases in burden to borrowers will be assessed under OMB Control #1845-0007 William D. Ford Federal Direct Loan Program (Direct Loan Program) Promissory Notes and related forms.

The Department recognizes that there may be changes to burden on servicers as a result of this proposed regulation. However, we do not believe there will be a significant impact on burden hours or number of respondents beyond what is accounted for elsewhere in this section.

§ 685.211 Miscellaneous, § 674.39 Loan rehabilitation, and § 682.405 Loan rehabilitation agreement

Three of the proposed regulations would allow a borrower to rehabilitate and/or receive the benefit of a suspension of AWG for a second time: Sections 674.39, 682.405, and 685.211. This widens eligibility for loan rehabilitation and thus adds burden to servicers who process rehabilitations. The Department estimates that approximately 91,700 additional borrowers would successfully rehabilitate their loan for a second time. If a servicer spends 8

hours on each borrower's loan rehabilitation, this adds 7,33,600 burden hours assigned to 1845-0021.

Updates in burden on borrowers due to the increased number of respondents for loans eligible for rehabilitation and/or administrative wage garnishment will be assessed under 1845-0120 Loan Rehabilitation: Reasonable and Affordable Payments.

§ 685.208 Fixed repayment

The Department proposes to restructure 685.208 to provide fixed repayment plans based on when the Direct Loan was made. Loans made before July 1, 2026, will contain the following fixed repayment plans: standard, graduated, and extended. Loans made on or after July 1, 2026, would only have the tiered Standard repayment plan as a fixed repayment plan option. Updates would be made to the form and the burden assessed under OMB #1845-0014 William D. Ford Federal Direct Loan Program Repayment Plan Selection Form. These updates will be completed and made available for comment through a full public clearance package before being made available for use by the effective date of the regulations.

This will also require servicers to update their systems, including eligibility logic for the updated repayment plans, train staff, and make edits to communications materials. The Department estimates this will take a total of 1,500 hours for servicers to update their systems to comply with the changes in repayment plan options. This results in 9,000 additional burden hours.

§ 685.210 Choice of repayment plan

Proposed 685.210 would change the eligible repayment plans available for loans made on or after July 1, 2026. Updates will be made to the form and the burden assessed under OMB #1845-0014 William D. Ford Federal Direct Loan Program Repayment Plan Selection Form. These updates will be completed and made available for comment through a full public clearance package before being made available for use by the effective date of the regulations.

Additional burden on servicers due to changes to repayment plans in their systems was accounted for in § 685.208. § 685.200 Borrower Eligibility

Section 81001 of the OBBB amended Section 455(a)(3)(C) of the HEA by terminating graduate and professional students' access to the Direct PLUS Loan program for any period of instruction beginning on or after July 1, 2026. This proposed regulation would decrease burden on institutions and individuals.

Section 685.200 requires PLUS loan applicants who have been denied a PLUS loan due to an adverse credit history determination to complete enhanced PLUS loan counseling and submit documentation of extenuating circumstances to the Secretary to request a review of the

loan application. Proposed 685.200 would result in a change in burden due to the elimination of the need for 1845-0129 PLUS Adverse Credit Reconsideration Loan Counseling for graduate and professional students.

§ 685.204 Deferment

Proposed § 685.204 would update the eligibility criteria for an economic hardship deferment based on loan disbursement date. Section 82002 of the OBBB amends section 455(f) of the HEA to remove the authority for unemployment and economic hardship deferments for Direct Loans made on or after July 1, 2027.

The proposed changes would decrease burden related to the deferment processes. Updates will need to be made to the current deferment forms under OMB Control #1845-0011 Federal Student Loan Program Deferment Request Forms and its associated burden. This form update will be completed and made available for comment through a full public clearance package before being made available for use by the effective date of the regulations.

§ 685.205 Forbearance

Section 82002 of the OBBB amends Section 455(f) of the HEA to limit the use of forbearance for future borrowers with loans made on or after July 1, 2027. Proposed 685.205 would decrease burden related to the forbearance processes due to the new limitations in the use of forbearance. This would decrease burden related to forbearance processes. Updates will also need to be made to OMB #1845-0018 Federal Student Loan Program: Internship/Residency and Loan Debt Burden Forbearance Forms and its associated burden. This form update will be completed and made available for comment through a full public clearance package before being made available for use by the effective date of the regulations.

§ 685.221 Alternative repayment

Section 82001(b) of the OBBB amended Section 455(d) of the HEA to define which repayment plans are available to borrowers with loans disbursed on or after July 1, 2026, thereby limiting which loans may use the alternative repayment plan to borrowers with Direct Loans made before July 1, 2026. We do not believe this proposed regulation contains burden. The alternative repayment plan was promulgated into regulation for borrowers with extreme circumstances. The Department does not anticipate there will be enough borrowers who meet the alternative repayment plan requirements each year to have a meaningful impact on burden for servicers.

§ 685.203 Loan Limits

To conform with changes from the OBBB, proposed § 685.203 would require updates to loan limits. Additionally, due to the changes proposed in 685.203, the Department proposes to waive the requirement in § 685.303(d)(5) that prevents Direct Loans from being disbursed in any other amount other than substantially equal installments when a borrower is enrolled for less than full time enrollment. These changes will create burden on institutions. A school may need to make significant changes to implement revised disbursement requirements including the ability to accommodate uneven disbursements between periods of enrollment.

Proposed § 685.203(m) addresses when a student is enrolled in an eligible program on a less than full-time basis that would require a school to calculate and reduce a borrower's loan disbursement amount based upon less than full-time enrollment status. Schools are already required to package Title IV aid evaluating for half-time or greater enrollment and less than half-time enrollment.

The Department estimates that changes proposed in § 685.203 will take 950 hours per institution or servicer to complete creating a total of 5,350,400 additional burden hours assigned to 1845-0021.

§ 685.209 Income-Driven Repayment

Section 685.209 proposes several modifications to the administration of income-driven repayment plans. First, we propose a new repayment plan, called the Repayment Assistance Plan, be added to 685.209 of the Direct Loan Regulations. This repayment plan would be available to all Direct Loan borrowers regardless of when the borrower received their loan except for excepted Direct Loans. Legacy plans PAYE, IBR, and ICR would only be available to borrowers for direct loans made before July 1, 2026. Adjustments to burden due to these revisions to income-driven repayment regulations would require updates to the 1845-0102 Income Driven Repayment form.

Proposed 685.209 would also require loan servicers to update their systems and policies and procedures to comply with the modified regulations. This includes changes related to repayment plan eligibility and monthly payment calculations.

We estimate it will take servicers 700 hours to complete systems programming and integration; 190 hours for testing, 50 hours for edits to letters or communication material, and 600 hours for project management for a total of 1,540 burden hours. Currently there are six loan servicers creating 9,240 additional burden hours assessed to 1845-0021.

§ 685.219 Public Service Loan Forgiveness Program (PSLF)

The Department proposes to amend § 685.219 Public Service Loan Forgiveness 82004(b) (1) through (3) of the OBBB amends section 455(m)(1)(A) of the HEA to specify the qualifying

repayment plans for the purposes of PSLF. Proposed 685 expands the definition of a qualifying repayment plan for PSLF by adding two new categories: (1) income-contingent repayment plans, but only for payments made on or before June 30, 2028, and (2) the new Repayment Assistance Plan under § 685.209. This will require updates to burden assessed to 1845-0110 Application and Employment Certification for Public Service Loan Forgiveness. This form update will be completed and made available for comment through a full public clearance package before being made available for use by the effective date of the regulations.

For institutions, we used the median hourly wage for Education Administrators, Postsecondary (11-9033) from the U.S. Bureau of Labor Statistics. In 2024 this was \$49.98.

Regulation	Information Collection Requirement	Burden Hours	Costs
§ 685.211 Miscellaneous, § 674.39 Loan rehabilitation, § 682.405 Loan rehabilitation agreement	OMB Control #1845-0120 Loan Rehabilitation: Reasonable and Affordable Payments Borrowers would be permitted to seek loan rehabilitation for a second time increasing burden on servicers.	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0120. 8 burden hours X 91,700 = 733,600 additional burden hours.	\$49.98 X 733,600 burden hours = \$36,665,328 total cost.
685.102 Definitions	Institutions will be required to update internal systems and policies.	300 hours X 5,626 institutions = 1,687,800 burden hours.	\$49.98 X 1,687,800 burden hours = \$84,356,244 total cost.
682.215 Income Based Repayment	OMB Control #1845-0102 Income Driven Repayment Plan Request for the William D. Ford Federal Direct Loans and Federal Family Education Loan Programs. Partial Financial Hardship will no longer be a requirement for IBR applicants removing burden from servicers.	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0102. Decrease of 90,286 burden hours from the regulatory collection 1845-0021 William D. Ford Federal Direct Loan Program (DL) Regulation.	\$49.98 X 90,286 = \$4,512,494 decrease in cost burden.

Regulation	Information Collection Requirement	Burden Hours	Costs
685.200 Borrower Eligibility	OMB Control #1845-0129 PLUS Adverse Credit Reconsideration Loan Counseling.	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0129.	N/A
685.201 Obtaining a Loan	OMB Control #1845-0103 William D. Ford Federal Direct Loan Program, Federal Direct PLUS Loan Request for Supplemental Information OMB Control #1845-0129 PLUS Adverse Credit Reconsideration Loan Counseling. Graduate and Professional students will not be able to borrow a PLUS loan.	2,020 institutions X 620 burden hours= 1,252,400 decrease in burden hours.	\$49.98 X 1,252,400 burden hours= \$62,594,952 total decrease in cost burden.
685.203 Loan Limits	Internal system changes for updates to loan limits would increase burden on institutions and servicers.	5,626 institutions + 6 Servicers = 5,632 respondents. 950 burden hours x 5,632 institutions= 5,350,400 total burden hours	\$49.98 X 5,350,400 burden hours = \$267,412,992 total costs.
685.204 Deferment	OMB Control #1845-0011 Federal Student Loan Program Deferment Request Forms.	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0011.	N/A
685.205 Forbearance	OMB Control #1845-0018 Federal Student Loan Program: Internship/Residency and Loan Debt Burden Forbearance Forms.	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0018.	N/A
685.208 Fixed payment repayment plans	OMB Control #1845-0014 William D. Ford Federal Direct Loan Program	The Department will assess the burden hours for proposed regulations with	\$49.98 X 9,000 hours =

Regulation	Information Collection Requirement	Burden Hours	Costs
	Repayment Plan Selection Form. Servicers will be required to update their systems.	the form updates to 1845-0014 Additional 1,500 burden hours X 6 = 9,000 hours	\$44,982,000 increase in costs.
685.209 Income driven repayment	OMB Control #1845-0102 Income Driven Repayment Plan Request for the William D. Ford Federal Direct Loans and Federal Family Education Loan Programs. Servicers will be required to update systems, policies, and procedures.	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0102. 6,000 burden hours X 6 servicers = 36,000 additional burden hours.	\$49.98 X 36,000 = \$1,799,280 increase in costs.
685.210 Choice of Repayment Plan	OMB Control #1845-0014 William D. Ford Federal Direct Loan Program Repayment Plan Selection Form.	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0014.	N/A
685.220 Consolidation	OMB Control #1845-0007 William D. Ford Federal Direct Loan Program (Direct Loan Program) Promissory Notes and related forms.	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0007	N/A
685.211 Miscellaneous	OMB Control #1845-0007 William D. Ford Federal Direct Loan Program (Direct Loan Program) Promissory Notes and related forms.	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0007.	N/A
685.219 PSLF	OMB Control #1845-0102 Income Driven Repayment Plan Request for the William D. Ford Federal Direct Loans and Federal	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0102, 0110, and 0164.	N/A

Regulation	Information Collection Requirement	Burden Hours	Costs
	Family Education Loan Programs. OMB Control #1845-0110 Application and Employment Certification for Public Service Loan Forgiveness. OMB Control #Public Service Loan Forgiveness Reconsideration Request.		
685.220 Consolidation	OMB Control #1845-0007 William D. Ford Federal Direct Loan Program (Direct Loan Program) Promissory Notes and related forms.	The Department will assess the burden hours for proposed regulations with the form updates to 1845-0007.	N/A
685.303 Processing Loan Proceeds	Schools must use a new calculation for students enrolling for less-than-full-time.	Burden for this proposed regulation was accounted for in 685.102.	N/A
Total		6,474,114 hours.	\$323,576,218 costs.

These proposed rules add 7,816,800 hours of burden; other adjustments in proposed regulation reduce the burden by approximately 1,342,686 hours. This results in a net increase of 6,474,114 burden hours assessed to 1845-0021 William D. Ford Federal Direct Loan program Regulations.

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 start-up costs related to the proposed regulations.

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 from these proposed regulations.

- 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	+ 6,474,114		
Total Responses	+ 183,300		
Total Costs (if applicable)			

The OBBBA made statutory changes to the regulations referenced in item 1. This increases the total number of responses by 183,300 and total number of burden hours by 6,474,114.

- 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 information in the final rule will not be published by the Department.

- 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” of OMB Form 83-I.

The Department intends to update the several forms related to the regulatory changes with this collection following the consideration of public comment. Public comment on proposed regulation—including a potentially significant volume of comments—may affect changes required for related forms. Due to the number and scope of form changes, consolidating the revised forms for comment under this Notice of Proposed Rulemaking would limit the ability to solicit targeted public comment and accurate burden estimates. Accordingly, the Department will submit the following forms as separate information collection each under its own OMB number.

Once updates to these forms have been proposed, the Department will submit a full clearance package. Because multiple forms are being revised the Department will submit a full collection package.

These proposed rules add 7,816,800 burden hours while also removing 1,342,686. Total, the Department estimates there will be a net increase of 6,474,114 burden hours assessed to 1845-0021 and an additional 183,300 respondents. We are requesting a total of 11,703,140 responses and 7,366,938 burden hours be added to this collection.

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