Shaping the Future of Loan Repayment: Participation and Repayment Progress in Federal Student Loan Plans

Supporting Statement, Part A

March 9, 2026

REVISED: June 30, 2026

Contents

Exhibits

Part A. Justification

Introduction

The Institute of Education Sciences (IES) within the U.S. Department of Education (ED) requests clearance from the Office of Management and Budget (OMB) to conduct new data collection activities for the *Shaping the Future of Loan Repayment: Participation and Repayment Progress in Federal Student Loan Plans* study. This request covers telephone/virtual interviews with federal student loan borrowers in repayment. This is the first and only request for the collection of data for this study.

A.1. Circumstances Making Collection of Information Necessary

To continue to solve the student loan debt crisis and make college affordable, the U.S. Department of Education (ED) needs to learn how many and what types of borrowers are enrolling in income-driven repayment (IDR) plans, and why. ED seeks to understand which borrowers do and do not enroll in IDR plans, why they do so, how long they stay in their plans, their repayment behaviors, and other household finance and life course outcomes, as feasible. ED also seeks to understand the feasibility of rigorous investigation with potential to expand knowledge about student loan repayment plans.

Little information exists on what borrowers understand about how plan features such as longer repayment period, forgiveness, a payment cap, an interest subsidy, or income-driven monthly payment, affect aspects of repayment and how borrowers may prioritize these different plan features. Improving the borrower repayment experience requires understanding how borrowers choose repayment plans, including their understanding of available options, comprehension of plan features and how those features affect their ability to pay back their loans, and the priorities that guide their decisions. The data collected for this study will update what is known about borrowers' repayment plan knowledge and decision making.

A.2. Purposes and Uses of the Data

ED's IES has contracted with Abt Global, the American Institutes for Research® (AIR®) and its partners Activate Research, Inc. (Activate), and a subject matter expert Professor Daniel Collier —collectively referred to hereafter as the study team—to address the study's research question and subresearch questions shown in **Exhibit A.1.**

The information collected for this study will generate information about borrowers' choice of federal student loan repayment plans that will be disseminated in a report and a brief. The report will describe borrowers' understanding and awareness of repayment plans and features as well as the reasons driving their plan choice. The brief will summarize key findings from the report.

Exhibit A.1. Research Question

Research question

To what extent do borrowers understand the available repayment plans and their features, and what information do borrowers report considering when selecting or switching repayment plans?[a]
• How aware of the different repayment plans and their features are borrowers with different characteristics? To what extent do borrowers understand how different repayment plans or their features will affect their monthly payments, the total amount they will repay, and the length of their repayment period? How does borrowers' understanding of the effects of different plan features vary based on differences in borrower and institutional characteristics?
• Which repayment plan features do borrowers of different characteristics prioritize when initially selecting a plan or switching plans?
• Why do borrowers select specific repayment plans or decide to switch plans?

[a] Other study research questions using data not covered in this clearance package are excluded from this table.

The study team will answer these research questions by collecting information from 60 federal student loan borrowers through semistructured, 30-minute telephone or virtual interviews between October 2026 and February 2027 (the interview protocol is included as Appendix A).

Borrowers' level data, such as audio/video recordings and transcripts with identifiable information, collected under this clearance will not be published or otherwise made available.

Tabulations, estimates, or other findings arising from data collected for this study that are included in public memos or reports will have clear caveats to indicate their exploratory nature.

A.3. Use of Technology to Reduce Burden

To minimize burden on respondents, the study team will use successful strategies from past studies with other adult populations.

Experienced interviewers will schedule interviews using an online booking tool that will be referenced in email invitations. These interviewers will conduct their interviews by video conference or telephone using a standardized interview protocol. To ensure accurate capture of responses and to support efficient coding, the study team may digitally record the interviews with respondents' permission.

Interviewers will ask most questions in an open-ended manner but interviewers will code responses into prespecified categories to the extent possible, using an online database. This approach provides for both standardization across types of borrowers and adequate opportunity for respondents to provide additional details. In addition, the use of an online coding platform and digital recording technology minimizes manual data entry and reduces the need for follow-up clarification, thereby lowering respondent burden. Automated prompts and real-time data validation within the system will help interviewers quickly categorize responses, while integrated transcription tools will streamline coding and analysis.

The study team will use AI applications to produce transcriptions of audio and video files, as well as for deductive coding of open-ended responses from the interviews. Interview data will be stored within AIR's project specific, segregated Azure environment that is isolated from other AIR projects using AIR's restricted-use infrastructure. Files uploaded for transcription or AI assisted qualitative coding are stored temporarily in user session specific folders within this dedicated project workspace, are not accessible to other AIR project teams or systems, will be encrypted in transit and at rest, and will be deleted within 24 hours of processing completion. AI outputs are returned only to the project team through the secure application interface or as downloadable files to be downloaded directly to the project workspace. The Azure AI Speech and Azure OpenAI services used operate entirely within AIR's private tenant, and project data are not used to train, fine tune, or improve any enterprise level or external AI models. Microsoft Azure OpenAI does not retain or use customer data for model training, and AIR does not permit cross project reuse of data for AI development or learning. These controls ensure that ESRA protected data remain isolated to this study and are not disclosed or incorporated into broader AI systems.

These technology-enabled features allow the study team to maintain data quality and completeness without requiring additional time or effort from respondents.

A.4. Efforts to Avoid Duplication

The study will identify borrowers for interviews using information from the Federal Student Aid (FSA) at the time of sample selection. To avoid collecting duplicate information from borrowers, these data will include details about each interviewee's postsecondary institution(s), federal student loans, their selected repayment plan(s), and repayment histories. These data are not covered in this clearance package. The ED program office will provide these items to the study team so there is no associated burden on outside respondents.

Before each interview, the interviewer will review the data collected from FSA.

A.5. Methods to Minimize Burden in Small Businesses

There is no anticipated impact on small businesses or other small entities.

A.6. Consequences of Not Collecting Data

The data collection described in this submission will be used to measure borrower's knowledge of repayment plans, awareness of repayment plans and features, and the reasons driving plan choice. If the study team does not collect these data, ED will be unable to provide policy makers and other stakeholders with new information to guide changes to existing repayment plans or development of new plans. Without the borrower's interviews, ED would be unable to describe the extent to which borrowers understand their repayment options and what plan features they value.

A.7. Special Circumstances Relating to the Guidelines of 5 C.F.R. 1320.5

No special circumstances apply to this study.

A.8. Consultations Beyond the Agency

A.8.a. Federal Register Announcement

The 60-day Federal Register notice was published on March 19, 2026, Vol. 91., No. 53 page 13297. Four comments were received on the study's recruitment and proposed data collection plan. No comments expressed opposition to or concerns about the proposed data collection.

Broadly, commenters emphasized the importance of acknowledging broader factors in the framing for the study and highlighted the need to account for the diversity of borrowers and their complex repayment experiences in sampling, recruitment, and interview methods.

After reviewing the public comments, the study team revised selected measures of household financial circumstances in the interview protocol. No changes are recommended to the IDR sampling plan, recruitment strategy, data collection plan, or the analytic focus.

A.8.b. Consultants Beyond the Agency

To inform the study design, a subject matter expert, Daniel Collier, and an external Technical Working Group (TWG) provided input at key points in the study. The subject matter expert and TWG members have expertise in the following areas relevant to this study:

- student decision making about student loans and repayment plans
- federal financial aid policy
- data collection through administrative and interview methods

Members of the TWG met on November 18, 2025, to discuss the study design and data collection plans. There will be two additional meetings of the TWG to inform the study's interpretation of preliminary findings and ensure that findings are relevant to policy makers and stakeholders.

Exhibit A.2 includes TWG members and their affiliations, listed alphabetically.

Exhibit A.2. Technical Working Group Members

Name	Organization
Dr. Dominique Baker	School of Education, University of Delaware
Dr. Nicholas Hillman	School of Education, University of Wisconsin-Madison
Dubravka Ritter	Federal Reserve Bank of Philadelphia's Consumer Finance Institute
Dr. Judith E. Scott-Clayton	Teachers College, Columbia University
Dr. Christina Tangalakis	Antelope Valley College
Dr. Sarah Turner	University of Virginia
Dr. Lesley Turner	University of Chicago Harris School of Public Policy
Dr. Basit Zafar	University of Michigan

A.8.c. Unresolved issues

There are no unresolved issues.

A.9. Payment or Gifts to Respondents

Providing incentives is important in federal studies, given the recognized burden and need for high response rates (Berry et al., 2008; Singer & Kulka, 2002; Singer & Ye, 2013). To encourage study participation, participants will receive a $45 e-gift card upon completion of the interview. This incentive amount is consistent with National Center for Education Evaluation (NCEE) guidelines for evaluation studies and has been adjusted for current dollars (National Center for Education Evaluation, 2005).[1]

A.10. Assurances of Confidentiality Provided to Respondents

The study team will conduct all data collection activities in full compliance with ED regulations and requirements to maintain the confidentiality of data obtained on private persons and to protect the rights and welfare of human research subjects, per the Education Science Reform Act of 2002 (Title 1, Part E, Section 183). Data collection activities will also be conducted in compliance with other Federal regulations, including the Privacy Act of 1974, P.L. 93-579, 5 U.S.C. 552 a; the Family Educational Rights and Privacy Act of 1974, 20 U.S.C. 1232g, 34 C.F.R. Part 99; and related regulations, including but not limited to: 41 C.F.R. Part 1-1 and 45 C.F.R. Part 5b.

The study team will protect the full privacy and confidentiality of all data collected for the study and will use it for research purposes only. The AIR project director will ensure that all Personally Identifiable Information (PII) about respondents remains confidential. When reporting the results, the study team will present data only in aggregate form, so that individual participants are not identified. The study team will also take the following steps to protect confidentiality:

- All data collection staff at AIR and Activate will complete required background clearances from ED (i.e., Electronic Questionnaires for Investigations Processing [e-QIP]), which requires completing personnel security forms, providing fingerprints, and undergoing a background check. All data collection staff will sign agreements that emphasize the importance of confidentiality and specify employees' obligations to maintain it.
- All members of the study team with access to the data will be trained and certified in the importance of confidentiality and data security. Staff will receive training regarding the meaning of confidentiality, particularly as it relates to providing assurance to participants about the protection of their responses. Measures to maintain confidentiality will include built-in safeguards concerning status monitoring.
- The study team will establish a data governance and security plan for all information collected as part of the study. The data governance/security plan will specify procedures for managing these data, including external requirements related to security (e.g., applicable regulations); roles and responsibilities of study team members, including processes for

[1] The adjustment to current dollars (from March 2005 to September 2025) was made using the U.S. Bureau of Labor Staistics's online tool: CPI Inflation Calculator.

onboarding new staff, monitoring and granting access to data, and managing subcontractor compliance; processes for information security, including accessing, storing, and transferring data; and processes for data quality control and data disposition. AIR's Information Security Office will review the appropriateness of all elements of the data governance/security plan.

- PII will be linked to other study data, using study-specific identification numbers. Access to PII, or a crosswalk file linking study-specific identification numbers to PII and contact information, will be limited to a few designated study team staff who need to know this information. All study staff with access to these data will go through required background clearances (i.e., e-QIP) and will receive training about confidentiality.
- All identifiers will be destroyed as soon as they are no longer required. Access to electronic files will be protected by secure usernames and passwords that will be available only to approved users. All data collected will virtually (i.e., audio/video recordings) will immediately be moved to a cloud-based server system that meets ED's security requirements.
- To ensure that study participants are properly protected, AIR's Institutional Review Board will review the study's design protocols, informed consent process, data governance/security plan, and all data collection instruments and procedures.

All voluntary requests for information will be accompanied by statements indicating the following:

- Information collected for this study comes under the confidentiality and data protection requirements of ED's IES, as required by the Education Science Reform Act of 2002, Title 1, Part E, Section 183.
- The information will be used only for the purposes of research approved by ED.
- The study team will hold in strict confidence all collected information and only disclose it for routine use purposes (per 5 U.S.C. 552a(e)3).

A system of records notice has been prepared for this study. ED published the notice by March2026.

A.11. Justification of Sensitive Questions

The purpose of the study is to understand borrowers' decision-making process when choosing a federal student loan repayment plan. Questions included in data collection are not intended to be sensitive and should not pose a problem to participants. However, it is possible that sensitive questions are included in the instrument tested under this clearance. Feedback as part of instrument testing will refine questions deemed sensitive.

A.12. Estimates of Respondent Burden

Exhibit A.3 summarizes reporting burden on respondents for data collections. The estimated hour burden for the study data collection is 30 hours.

Exhibit A.3. Estimated Respondent Time Burden for the Current Information Collection Request

Type of data	Number of respondents	Number of responses	Average time per response (hours)	Total time burden (hours)	Estimated average hourly wage [a]	Total cost burden
Borrower interviews	60	60	0.5	30	$35.49	$1,064.70
Total for study	**60**	**60**		**30**		**$1,064.70**

[a] Wage estimates are based a weighted average of median weekly earnings for full-time wage and salary workers with some college or an associate degree (24 individuals at $1,056/week), with a bachelor's degree (24 individuals at $1,543/week), or an advanced degree (12 individuals at $1,901/week) in 2024 based on the Labor Force Statistics from the Current Population Survey maintained by the U.S. Bureau of Labor Statistics (CPS Tables : U.S. Bureau of Labor Statistics).

A.13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no costs to respondents for participating in the research covered by the current clearance request, except for their time to participate in the interview.

A.14. Estimates of Annualized Costs to the Federal Government

The estimated cost to the federal government of this study, including its data collection activities and reporting as described above, is $2,463,016 over four years, or an annual cost to the federal government for this study of approximately $615,754.

A.15. Explanation for Program Changes or Adjustments to Burden

[NOT APPLICABLE]

A.16. Plans For Analyses, Publication, and Schedule

A.16.a. Analysis Plan

To address the research questions, the study team will conduct descriptive analyses. Specifically, the study will produce tabulations such as counts and percentages (for categorical variables).

The study team expects the analysis and reporting to focus on the following topics of interest:

- borrower awareness and knowledge of repayment plans and the features of repayment plans
- borrower understanding of the effects of plan features on repayment progress
- repayment plan features borrowers prioritize when choosing a plan
- other reasons why borrowers chose their repayment plan

The study team will categorize respondents' answers to interview questions and then quantify and tabulate these responses. Response options shown in the data collection instrument (see Appendix A) will serve as preliminary categories for analysis. For many questions, responses across borrower characteristics will be compared.[2]

A.16.b. Publication Plan and Schedule

The study team will conduct two rounds of analysis and one round of reporting for IES, using the data detailed in this clearance request and the methods described in the previous subsection:

- **Final report**. The final report, expected to be released in early 2028, will present in-depth findings from the study's final quantitative and qualitative analyses, and will be written and organized so that it is accessible to policy makers and practitioner. This report will include a set of detailed technical appendices.

The report will be publicly available on IES's website and will follow guidance provided in the *NCES Statistical Standards* (National Center for Education Statistics, 2014) and the *IES Style Guide* (Institute for Education Sciences, 2005). In addition, the final report will be accompanied by a one-page highlights document that succinctly summarizes key findings for the public.

A.17. Approval to Not Display OMB Expiration Date

No exemption is requested. All data collection instruments will include the OMB expiration date.

A.18. Explanation of Exceptions to the Paperwork Reduction Act

No exceptions are needed for this data collection.

[2] Borrower characteristics include highest level of degree attempted, level and control of institution attended, Pell-grant eligibility status, and degree completion status.

References

Berry, S. H., Pevar, J., & Zander-Cotugno, M. (2008). *The use of incentives in surveys supported by federal grants*. RAND. https://www.rand.org/content/dam/rand/pubs/working_papers/2008/RAND_WR590.pdf

Braun, V., & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology*, *3*(2), 77–101. https://doi.org/10.1191/1478088706qp063oa

Braun, V., & Clarke, V. (2012). Thematic analysis. In H. Cooper, P. M. Camic, D. L. Long, A. T. Panter, D. Rindskopf, & K. J. Sher (Eds.), *APA handbook of research methods in psychology: Research designs: Quantitative, qualitative, neuropsychological, and biological* (Vol. 2, pp. 57–71). American Psychological Association. https://doi.org/10.1037/13620-004

Institute of Education Sciences. (2005). *IES style guide.* U.S. Department of Education. https://nces.ed.gov/statprog/styleguide/pdf/styleguide.pdf

National Center for Education Evaluation. (2005, March). *Guidelines for incentives for NCEE evaluation studies.*

National Center for Education Statistics. (2014). *NCES statistical standards.* https://nces.ed.gov/use-work/resource-library/resource/handbook/nces-statistical-standards-0?pubid=2014097

Singer, E., & Kulka, R. A. (2002). Paying respondents for survey participation. In M. Vander Ploeg, R. R. Moffitt, & C. F. Citro (Eds.), *Studies of welfare populations: Data collection and research issues* (pp. 105–128). National Academy Press.

Singer, E., & Ye, C. (2013). The use and effectives of incentives in surveys. *Annals of the American Academy of Political and Social Science*, *645*(1), 112–141. https://doi.org/10.1177/0002716212458082

About the American Institutes for Research®

Established in 1946, the American Institutes for Research® (AIR®) is a nonpartisan, not-for-profit institution that conducts behavioral and social science research and delivers technical assistance both domestically and internationally in the areas of health, education, and the workforce. With headquarters in Arlington, Virginia, AIR has offices across the U.S. and abroad. For more information, visit AIR.ORG.

AIR Headquarters
1400 Crystal Drive, 10th Floor
Arlington, VA 22202-3289
+1.202.403.5000 | **AIR.ORG**

29425_12/25