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

## Supporting Statement, Part B

**March 9, 2026**

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# Part B. Collection of Information Employing Statistical Methods

## 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 the 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.

IES has contracted with Abt Global, the American Institutes for Research® (AIR®) and its partners Activate Research, Inc. (Activate), and subject matter expert Professor Daniel Collier—collectively referred to hereafter as the study team—to collect data to address the study's research questions. The interviews will generate information on borrowers' choice of federal student loan repayment plans, including:

- Borrowers' awareness of the repayment plans available when they entered loan repayment,
- Borrowers' understanding of how differences in plan features affect monthly payment amount, changes in their outstanding loan balances, and other aspects of their repayment progress, and
- Borrowers' reasons for selecting specific repayment plans or switching plans.

Qualitative analyses of interview data will examine how borrowers' awareness, understanding, and selection of repayment plans vary by borrower characteristics such as highest degree attempted (undergraduate or graduate), level and control of institution attended (public, private nonprofit, private for-profit, two-year, four-year), Pell Grant eligibility, and whether the borrower completed the intended degree.

See Exhibit A.1 in Part A for additional details.

While these interviews aim to capture borrowers' knowledge of repayment plans and their reasons for choosing them, the data are intended for exploratory analysis rather than to produce findings that are representative of the entire borrower population.

## B.1. Respondent Universe and Sampling Methods

### *B.1.1 Respondent Universe*

The universe includes all 42.7 million federal student loan borrowers (Federal Student Aid [FSA], 2025). From this universe, the study will select a 5% random sample of unique federal student borrowers, using the last three digits of social security numbers, who meet the following eligibility criteria:

1. **Loan Type:** Borrowers with any of the following federal student loan types: Direct Subsidized Loans, Direct Unsubsidized Loans, Grad PLUS Loans, Direct Consolidation Loans, and Perkins Loans. Borrowers with *only* FFEL loans and Parent PLUS Loans will be *excluded* from the sample.
2. **Time period:** Borrowers who entered loan repayment between September 2013 and December 2025.[1]

From this initial study sample[2] (Sample 1), the study team will select a second implicitly stratified random sample (Sample 2)[3] of 600 borrowers for interview recruitment. Borrowers in Sample 2 must meet one of the following conditions:

1. entered repayment for the first time on a federal student loan between July 2025 and December 2025; **OR**
2. switched their federal student loan repayment plan between July 2025 and December 2025.[4]

### *B.1.2 Sampling Methods*

As described in the previous section, the broader study sample (Sample 1) consists of borrowers drawn from a 5% random sample of all unique federal student borrowers who meet the study's eligibility conditions. From this 5% sample, the study team will use implicit stratified random sampling to select 20 borrowers from each of the 30 distinct borrower "strata" (Sample 2), which are defined by the characteristics outlined in Section B.2.

### *B.1.3 Expected Response Rates*

The study team anticipates a 10% response rate for this data collection activity because borrowers are not obligated to participate in interviews conducted by ED (see Exhibit B.1). This

[1] The date the student-entered repayment is often called the disclosure date because the servicer typically provides the borrower with information about their new repayment plan on this date. We will use the data field for the disclosure date to measure when a student enters repayment.

[2] This sample is not covered in this clearance package. The ED program office will provide administrative data for this sample directly to the study team, resulting in no associated burden on borrowers.

[3] In contrast to explicit stratification, which divides the sample frame into distinct strata, implicit stratification sorts the population units by key characteristics (e.g., degree completion status, Pell-grant eligibility) and then selects every kth unit after a random start. When the sort variables are strongly correlated with the outcomes of interest, implicit stratification can improve the precision of estimates. However, because the method does not create separate strata, it provides less direct information for estimating sampling variance, which can reduce the accuracy of variance estimates.

[4] Setting August 2024 as the earliest point at which a borrower entered repayment for the first time or switched repayment plans is designed to ensure that borrowers can recall circumstances that influenced their choice of a repayment plan. This date will limit the amount of time that has elapsed between the time when the borrower enrolled in a (new) repayment plan and the time of the interview to no more than 24 months.

expected response rate reflects that the sample comprises of borrowers selected at random who are not participating in any specific program and have no prior notice or reason to expect study contact. Similar sampling approaches, such as random digit dialing (RDD) surveys, typically achieve response rates in this range (Pew, 2012; Keeter et al., 2017; Kennedy & Hartig, 2019; UCLA Center for Health Policy Research, 2025). This anticipated response rate informs the study's recruitment strategy. Because the interviews are exploratory and not designed to produce information that is representative of the broader population of borrowers, the study does not plan to conduct non-response bias analyses.

**Exhibit B.1. Respondent Universe, Sample, and Expected Response Rate for Data Sources**

| Data Source | Respondent | Respondent Universe | Sample | Expected Response Rate |
|---|---|---|---|---|
| FSA[a] | Federal student loan borrowers | 600 | Implicit stratified random sampling | 10% |

[a] The FSA data is not covered in this clearance package. The ED program office will provide administrative data directly to the study team, resulting in no associated burden on borrowers.

## B.2. Statistical Methods for Sample Selection and Degree of Accuracy Needed

### *B.2.1. Sample Selection*

The study team will use an implicit stratified random sampling method. Borrowers will be ordered (implicitly stratified) based on four characteristics associated with borrowers' ability to repay their student loans (Chakrabarti, 2017; Lee & Looney, 2018; Pew Charitable Trusts, 2024). These characteristics, measured at the time of sample selection using FSA administrative data, include:

1. Highest degree level attempted: undergraduate or graduate
2. Institution level and control, with priority assigned as follows for borrowers who attended multiple institutions:
    a. 4-year private for-profit
    b. 4-year private nonprofit
    c. 4-year public
    d. 2-year private for-profit
    e. 2-year private nonprofit
    f. 2-year public
3. Most recent Pell grant-eligibility: eligible or not eligible

4. Degree completion status: completed or not completed

Sample 1 will be sorted by these characteristics, generating 30 borrower “strata” (see Exhibit B.2). Students seeking a graduate degree are not eligible for Pell Grants and they do not attend two-year institutions. After sorting Sample 1, the study will draw a systematic sample using a random start and fixed sampling interval to select cases for recruitment. This implicit stratification procedure ensures that the sample reflects the diversity of borrower characteristics. Within each “stratum,” 20 borrowers will be randomly selected, and the study will recruit borrowers until completing two interviews per “stratum”, yielding 60 completed interviews for analysis.

The study will not apply weighting and will not produce population-level estimates. Results are not intended to be statistically representative. Instead, the sampling approach is designed to ensure breadth across borrower characteristics that prior research has shown to be related to repayment progress. The goal is to capture a range of perspectives from borrowers whose educational pathways, institutional contexts, and financial backgrounds vary across “strata”. This approach also enables exploratory analyses that compare borrower perspectives across subgroups, as shown in Exhibit B.3. Because the interviews are exploratory and are not designed to estimate population parameters, no nonresponse bias analyses are planned.

**Exhibit B.2. Respondent Sampling Methods**

| Undergraduate | | | | | | | | | | | | | | | | | | | | | | | | Graduate | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 2-year private for-profit | | | | 2-year private nonprofit | | | | 2-year public | | | | 4-year private for-profit | | | | 4-year private nonprofit | | | | 4-year public | | | | 4-year private for-profit | | 4-year private nonprofit | | 4-year private for-profit | |
| Pell Eligible | | Not Pell Eligible | | Pell Eligible | | Not Pell Eligible | | Pell Eligible | | Not Pell Eligible | | Pell Eligible | | Not Pell Eligible | | Pell Eligible | | Not Pell Eligible | | Pell Eligible | | Not Pell Eligible | | Not Pell Eligible | | | | | |
| Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed | Degree completed | Degree not completed |
| **Target number of completed interviews** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| **Initial number of borrowers identified** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 |

*Note*. The first row refers to the highest degree the borrower ever pursued. The second row refers to the type (2- or 4-year) and control (public, private for-profit, private nonprofit) of institution attended. Pell-eligibility status will be determined using the most recently available information at the time of sample selection. This status typically reflects the status at the time of the most recent submission of the FAFSA. Degree completion refers to the highest degree the borrower ever pursued.

**Exhibit B.3. Number of Borrowers by Borrower Characteristic**

| Borrower Characteristic | Number of Borrower Interviews |
|---|---|
| **Degree pursued** | |
| Undergraduate | 48 |
| Graduate | 12 |
| **Level of institution attended** | |
| 2-year | 24 |
| 4-year | 36 |
| **Control of institution attended** | |
| Public | 20 |
| Private non-profit | 20 |
| Private for profit | 20 |
| **Pell grant eligibility** | |
| Eligible | 24 |
| Not eligible | 36 |
| **Degree completion status** | |
| Completed degree pursued | 30 |
| Did not complete degree | 30 |

### *B.2.2. Estimation Procedures*

To address the research questions, the study team will conduct descriptive analyses. Specifically, for items with fixed response options, such as "What you the borrower's marital status (single, married, divorced, separated, widowed)?", the study team will code responses from borrowers, in real time, into a form. The study team will then use these responses to produce summary statistics such as counts and percentages for each response category.

For open-ended questions, such as why borrowers chose to enroll in their repayment plan, the study team will use Braun and Clarke's (2006, 2012) thematic analysis approach. The team will organize, code and analyze data to identify patterns and themes aligned to the study's conceptual framework.[5]

Before interviews begin, the study team will develop an initial, deductive (top-down) codebook based on the study's conceptual framework. After the data collection, the team will add

[5] For open-ended responses, the study team may also incorporate the use AI tools for deductive coding that use Large Language Models (LLMs), such as GPT-3.5. This approach known as LLM-assisted content analysis (LACA) , supports deductive coding of unstructured text documents. Although not a replacement for qualitative researchers, LLMs can significantly assist the deductive coding process.

inductive (bottom-up) codes that emerge from the interview data. Coding will be conducted using qualitative analysis software.

To support reliability, coders will jointly code three transcripts at the start of each coding round and assess interrater agreement. The study team will then code all assigned transcripts, conducting multiple rounds of coding to refine deductive and inductive insights. Coders will meet after each round to discuss their coding decisions, reconcile differences, and agree on final codes. Using frequency reports generated in the qualitative software, the study team will group codes into categories and themes that reflect the most common response patterns across participants. At least two study team members will review all codes, categories, and themes to ensure reliability and analytic consistency.

### *B.2.3. Degree of Accuracy Needed*

Because this study is exploratory, it does not aim to estimate population parameters or characterize those estimates with a specified level of precision. Although the sample is selected using systematic sampling with implicit stratification, findings from borrower interviews are **not** intended to generalize to the broader population of federal student loan borrowers. Instead, the purpose is to capture perspectives from borrowers with characteristics that prior research identifies as related to repayment progress.

The 60 interviews will be distributed across borrower subgroups ranging in size from 12 to 48 borrowers (see Exhibit B.3). These subgroup sizes are sufficient to achieve qualitative saturation, the point at which additional interviews no longer yield new themes or insights (Guest et al., 2006; Creswell & Poth, 2018, Hennick & Kaiser, 2022). Achieving saturation, a widely accepted benchmark in qualitative research, ensures that the data collected adequately reflects the range of borrower perspectives relevant to the study objectives, while minimizing redundancy and maintaining analytic rigor.[6]

### *B.2.4. Unusual Problems Requiring Specialized Sampling Procedures*

No unusual problems requiring specialized sampling procedures are anticipated.

### *B.2.5. Use of Periodic Data Collection to Reduce Burden*

To minimize respondent burden, the study team will collect data from each borrower once.

## B.3. Methods to Maximize Response Rates and Address Nonresponse

### *B.3.1. Methods to Maximize Response*

The study will recruit interview participants over a field period of approximately 18 weeks, or until we obtain 60 completed interviews, distributed as shown in Exhibit B.2, across the

[6] See Hennick & Kaiser, 2022, for a systematic review of the relationship between qualitative sample sizes and saturation.

borrower "strata," two in each of the 30 borrower "strata." Once this quota is met for a "strata," no new borrowers in the "strata" will be recruited.

During the data collection period, the study team will release batches of information on 120 borrowers at a time for recruitment, with up to five rounds of additional batches released every 1 to 2 weeks or until the 60 interviews have been completed. This strategy will allow the study team to (a) align the number of borrowers identified for recruitment to the capacity of interviewers during the course of the field period, and (b) minimize burden by limiting recruitment to the minimum number of borrowers needed to complete a quota of 60 interviews, distributed equally across the 30 borrower "strata."

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 ED's National Center for Educational Evaluation and Regional Assistance (NCEE) guidelines for evaluation studies and has been adjusted for current dollars (NCEE, 2005).[7] Study recruitment materials will (a) note the value of participant feedback for improving the student loan repayment plan process for future borrowers, (b) feature the $45 e-gift card for completing an interview, and (c) highlight the fact that only a select group of borrowers were invited to participate. To view the study outreach materials, see Appendix B.

### Initial Mailing

For each batch of 120 borrowers released for recruitment, the study team will mail an initial outreach packet via regular mail to each identified borrower (See Appendix B). This packet will consist of a letter that invites the recipient to participate in the study and a frequently asked questions (FAQ) document. The letter will include information about the purpose of the study, the duration of the interview and types of questions it will include, and the offer of a $45 e-gift card for completion of the interview. The letter will include a QR code and a URL, either of which the borrower can use to connect to the interview scheduling software. The FAQs document will provide additional information about the study, participants' rights, and how the study team will protect participants' privacy. The FAQs will also include a study email address and telephone number.

### Initial Study Email Invitation

Approximately 7 days after the initial mailing, the study team will email borrowers an invitation to the study from a study-branded email address (see Appendix B). This email invitation will

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

include an overview of the study, an invitation to participate, details on how to sign up using the online scheduler, and the offer of a $45 e-gift card upon completion of an interview.

Upon notification that the study email invitation could not be delivered to an email address, the study team will continue nonresponse follow-up by text and telephone, if a telephone number is available.

**Methods to Deal with Issues of Nonresponse**

The study team will send borrowers follow-up emails and texts, and will call them until we secure a scheduled interview or have reached the maximum number of follow-up attempts (see Exhibit B.4). Designated study team members will check the study's email account and telephone voicemail daily. Throughout the recruitment period, the team will send up to a total of six emails and six text reminders, and will place up to two follow-up telephone calls per borrower. The study team will keep tallies on the number of nonrespondents to study recruitment activities.

**Exhibit B.4. Recruitment Outreach Activity, by Data Collection Week and Batch Round**

| Week | Batch Release Round | | | | | |
|---|---|---|---|---|---|---|
| | 1 | 2 | 3 | 4 | 5 | 6 |
| -2 | Initial mailing | | | | | |
| -1 | | | | | | |
| 0 | Initial email | | | | | |
| 1 | Follow up 1: email, text | | | | | |
| 2 | Follow up 2: email, text | | | | | |
| 3 | Follow up 3: email, text, phone call | Initial mailing | | | | |
| 4 | Follow up 4: email, text | | | | | |
| 5 | Follow up 5: email, text, phone call | Initial email | Initial mailing | | | |
| 6 | Follow up 6: email, text | Follow up 1: email, text | | | | |
| 7 | | Follow up 2: email, text | Initial email | Initial mailing | | |
| 8 | | Follow up 3: email, text, phone call | Follow up 1: email, text | | | |
| 9 | | Follow up 4: email, text | Follow up 2: email, text | Initial email | Initial mailing | |
| 10 | | Follow up 5: email, text, phone call | Follow up 3: email, text, phone call | Follow up 1: email, text | | |
| 11 | | Follow up 6: email, text | Follow up 4: email, text | Follow up 2: email, text | Initial email | Initial mailing |
| 12 | | | Follow up 5: email, text, phone call | Follow up 3: email, text, phone call | Follow up 1: email, text | |
| 13 | | | Follow up 6: email, text | Follow up 4: email, text | Follow up 2: email, text | Initial study email |
| 14 | | | | Follow up 5: email, text, phone call | Follow up 3: email, text, phone call | Follow up 1: email, text |
| 15 | | | | Follow up 6: email, text | Follow up 4: email, text | Follow up 2: email, text |
| 16 | | | | | Follow up 5: email, text, phone call | Follow up 3: email, text, phone call |
| 17 | | | | | Follow up 6: email, text | Follow up 4: email, text |
| 18 | | | | | | Follow up 5: email, text, phone call |

## B.4. Tests of Procedures

During the 60-day public comment period, the study team will conduct cognitive interviews using the borrower interview instrument with nine individuals to ensure that the questions are clear to respondents. The study team will recruit individuals who reflect multiple subgroup populations as part of the sampling approach.

During the interview, the study team will note any questions that interview respondents find difficult to understand or answer. After the interview, the study team will gather additional feedback on the interview's length, content, and clarity. On the basis of this feedback, the study team will revise the interview protocol to ensure that respondents can understand and complete the interview accurately and as intended. If necessary, the study team will update the burden estimates in Part A of this supporting statement, using the average interview duration.

## B.5. Individuals Consulted on Statistical Aspects of the Design and Leading Data Collection/Analysis

The study team members listed in Exhibits B.5 and B.6 provided primary consultation for ED about the design of the study and data collection plan and/or will lead the data collection and analysis.

### Exhibit B.5. Key Consultants on Statistical and Qualitative Design

| Name | Title and Affiliation | Telephone Number |
|---|---|---|
| Dan Collier | Assistant Professor of Higher and Adult Education, The University of Memphis | 901-678-1234 |
| Amanda Parsad | Managing Director | 202-403-5000 |
| Robert Nathenson | Principal Researcher | 202-403-5000 |

The following individuals will be responsible for the Data Collection and Analysis:

### Exhibit B.6. Leads for Data Collection and Analysis

| Name | Title and Affiliation | Telephone Number |
|---|---|---|
| Tamara Linkow | Senior Director | 202-403-5000 |
| Carter Epstein | Principal Researcher | 202-403-5000 |
| Vanessa Coca | Senior Researcher | 202-403-5000 |

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