

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Application to Participate in Federal Student Financial Aid Programs

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Department of Education (the Department) seeks to amend the Approval to Participate in the Federal Student Financial Aid Programs, OMB #1845-0012 in order to add Eligible Workforce Programs.

The One Big Beautiful Bill Act (OBBBA), signed into law on July 4, 2025, made statutory changes to Federal Pell Grants that impact regulatory requirements proposed in this information collection. Section 83002(b) of the OBBB established a new academic program in which eligible students can receive Pell Grants. Programs must meet several criteria to become eligible workforce programs which the Department must obtain, review and maintain as outlined in the law and regulations.

This is a request for a revision of 1845-0012 to add Eligible Workforce Programs to the Application. There have been no other changes to the collection since the last ICR approved by OMB on 03/31/2026. All additional burden currently assessed to this collection remains the same.

For context and statutory background, Section 487(c) of the Higher Education Act (HEA) of 1965, as amended, requires that the Secretary of Education prescribe regulations to ensure that any funds postsecondary institutions receive under the HEA are used solely for the purposes specified in and in accordance with the provision of the applicable programs.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The School Eligibility and Oversight Service Branch (SEOSB) of Federal Student Aid (FSA) at the Department reviews and analyzes the information submitted through this collection. SEOSB staff use this information to make determinations regarding an institution's eligibility and/or certification to participate in Title IV federal student aid programs. The information collected has been, and continues to be, used for the following purposes:

- Designating an institution as eligible,
- Certifying or recertifying participation in Title IV programs,
- Approving expansions (such as new locations or programs) for Title IV purposes,
- Updating records for changes (e.g., name, address),
- Approving continued certification after changes in institutional ownership, or
- Denying eligibility, certification, or approval for expansion.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The Department collects and stores institutional data electronically through Partner Connect, its information management system. Institutions access and submit applications via fsapartners.ed.gov, where many responses are pre-populated to reduce burden. The Application uses smart logic to skip non-applicable questions, provides alerts for missing or incorrect information, and includes help text and contact features. Upon submission, institutions receive immediate electronic confirmation, and application data is automatically saved, reducing manual entry and increasing accuracy. These electronic processes and features are designed to minimize burden and streamline the collection and review of information.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

Institutions are not required to maintain duplicate records. The Application provides the initial contact of an institution seeking to participate in Federal programs administered by FSA. A new institution will not have provided similar information to any other office in the Department.

While a continuing institution may have provided some similar information as part of the Integrated Postsecondary Education Data System (IPEDS) survey, schools are statutorily required to report changes and new information within 10 days (per 34 CFR 600.21), so the data annually reported to IPEDS cannot be relied upon for establishing Title IV eligibility.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The information collection does not impact small businesses or other small entities.

- 6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Section 498(g) of the HEA requires the Department to recertify all institutions participating in Title IV programs, with a maximum approval period of six years. The Secretary may provisionally certify new institutions, those changing ownership, or those with financial or administrative weaknesses for one to three years, enabling increased monitoring. If information were collected less frequently or not at all, the Department would violate statutory requirements and lose essential gatekeeping tools. New institutions could not participate, and current institutions could not continue beyond their approval or expand eligibility, ultimately preventing students from accessing federal aid. Regular collection also helps detect institutions that may attempt to abuse Title IV funding, protecting both program integrity and student interests.

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 collection of information does not meet any of the special circumstances described above.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, 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 April 10, 2026, the Department published a Federal Register notice (91 FR 18446) inviting public comment on this collection. We received one anonymous comment during the 60-day comment period, outlining an approach for collecting data relevant to Workforce Programs. We appreciate this input and affirm that the Department will continue to collect all data required by applicable regulations. This is now the request for the 30-day public comment notice be published in the Federal Register.

The Application has been in use since September 1996 and was designed based on input from a focus group of industry professionals to improve clarity, reduce burden, and enhance gatekeeping. The Department regularly consults with the higher education community, including at annual Title IV administration conferences, where feedback has been consistently positive.

Department staff also attend state, regional, and professional meetings to gather input on policies, procedures, and the Application, and receive feedback via phone and email. In response to community suggestions, the Department has made improvements such as removing obsolete questions, clarifying items, and adding questions to reduce follow-up.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.

No payments or gifts will be provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

The Application includes a Privacy Act Notice that informs institutions of the statutory authority for collecting the information, explains that disclosure is voluntary but required for Title IV eligibility, and identifies third parties to whom information may be disclosed. The collection is covered by the System of Records Notice (SORN) for Federal Student Aid Partner Connect (18-11-24), effective 7/15/25. All information is handled in accordance with applicable statutes, regulations, and agency privacy policies.

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.

This collection does not ask questions of a 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.

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.

The Department has determined that the additional burden imposed by the proposed changes is negligible. The revisions to the Application consist primarily of adding a small number of data fields related to Eligible Workforce Programs (see attached *Application Questions* document). These changes do not materially increase the time required for institutions to complete the application; most institutions will be able to respond using information they already collect.

The burden for schools is reported below, divided by institution type. The figures are averages based on 2017–2024 application numbers and have not changed since the most recently approved ICR.

Table 1: Estimated Annual Burden and Respondent Costs

Institution Type	Respondents	Responses	Burden Hours / Response	Annual Burden Hours	Average Hourly Wage	Total Annual Costs
Public	1329	1511	3.9	5,892	\$54	\$318,164
Non-Profit	1303	1465	4.1	6,008	\$59	\$354,444
Proprietary	1094	1272	3.3	4,197	\$67	\$281,212
<i>Total</i>	<i>3726</i>	<i>4248</i>		<i>16,097</i>		<i>\$953,819</i>

Table 2: Supporting details - Estimated Responses by Application Type

Institution Type	Change in Ownership	Designated Eligible	Initial	Merger	Recertification	Reinstate	Update
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Public	1	1	3	4	377	3	1121
Non-Profit	9	6	22	3	427	4	994
Proprietary	75	1	45	2	395	4	750
<i>Total</i>	<i>85</i>	<i>9</i>	<i>69</i>	<i>9</i>	<i>1200</i>	<i>11</i>	<i>2865</i>

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 is no cost burden to respondents or record-keepers resulting from the information collection other than that shown in items 12 and 14. The total government expense for capital and startup costs for this Information Collection is zero.

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.

The Department has determined that the additional costs associated with the proposed changes are negligible. Any costs incurred are limited to minor system updates required to add the new data fields and clarify instructions in Partner Connect. These updates do not require substantial investment in technology or staff time, and are incorporated as part of the Department's ongoing system maintenance and improvement activities.

The following table identifies the costs associated with reviewing applications and maintaining Partner Connect, the electronic system that stores Application data:

Table 3: Annualized Cost to the Federal Government

Application Type	Responses	Review Hours	Total Hours	Average Hourly Wage	Cost per Application Type
Merger / Change in Ownership	94	4	377	\$44	\$16,566
Initial / Designated as Eligible	78	1	78	\$44	\$3,432
Recertification / Reinstatement	1210	1	1,210	\$44	\$53,257
Update	2579 ¹	0.4	1,032	\$44	\$45,388
Cost to review Application information:					\$118,642
Cost to maintain system and improve electronic Application:					\$11,800,000
Total Annualized Cost to the Federal government:					\$11,918,642

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

¹ Approximately 10% of these update applications are automatically reviewed. The cost and hours figures for this line reflect that savings.

Total Burden	0	0	0
Total Responses	0	0	0
Total Costs (if applicable)			

The Application is only receiving minor updates since the most recent OMB approval of this collection on 03/31/2026. The minor updates entail negligible changes in data entry burden for schools. The Department continues to estimate 4,248 responses and 16,097 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.**

Application information is not analyzed and no results are 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 approval to omit the display of the OMB expiration date.

- 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 statement.