

OMB Clearance Request: Part A—Justification

Study of Higher Education Articulation Agreements Covering the Early Care and Education Workforce

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Study Overview

Study Purpose

The purpose of this study is to identify elements that states have in place to enable successful articulation as early care and education (ECE) workers progress from an associate's degree to a bachelor's degree and describe states' successes and challenges in implementing the elements. Specifically, the study will use telephone interviews, focus groups, and review of extant documents to examine ECE articulation policies and their implementation in six focal states — California, Florida, Indiana, Massachusetts, New Mexico, and Pennsylvania — that have statewide articulation policies addressing degrees or coursework in early childhood education.

Policy Context

Given the importance of early childhood experiences for building critical foundations for children's future success in life (Institute of Medicine and National Research Council of the National Academies 2015; National Scientific Council on the Developing Child 2007), there is growing interest in ensuring that educators who work with young children have the knowledge, skills, and abilities needed to leverage the developmental opportunities possible in the early years. The National Academies of Sciences recently recommended that early childhood educators working with children from birth through age 8 should be required to hold a bachelor's degree and that comprehensive pathways at the individual, institutional, and policy levels are needed to help transition to this requirement (Institute of Medicine and National Research Council of the National Academies 2015).

At this time, however, the education level of the early childhood workforce is quite low compared with the K-12 workforce. Less than half of teachers or child care providers working with preschool-aged children hold a bachelor's degree or above (Bureau of Labor Statistics 2015; National Survey of Early Care Education 2013). Similarly, less than one in five home-based and infant-toddler caregivers has a bachelor's degree.

One barrier faced by ECE workers in their attempts to advance their education level is a scarcity of articulation agreements to facilitate transfer of credits and coursework between degree programs (Limardo, Sweeney, and Taylor 2016). Early childhood educators who pursue additional education may experience a loss of course credit and a disruption of degree progress as they transfer between two- and four-year colleges and universities (Jenkins and Fink 2015), which can add substantial time and cost to pursuing a bachelor's degree.

As federal and local governments seek to improve the qualifications of early childhood educators and develop more seamless pathways to the baccalaureate, policymakers may wish to strengthen systems of articulation that govern transfer of course credits between public two- and four-year colleges and universities. To inform such efforts, this study is examining a variety of approaches that states have taken to implement ECE articulation and to help students transfer and complete ECE degrees. The study also will discuss successes, challenges, and lessons learned in implementation of those policies.

Study Design

The study will examine ECE articulation policies and their implementation in six focal states — California, Florida, Indiana, Massachusetts, New Mexico, and Pennsylvania — and will address three study questions:

1. What policies have focal states adopted to enable successful ECE articulation?
2. What ECE policies and practices— including aspects of policy, practice, and state and institutional context — support a framework for successful statewide articulation of ECE coursework?

3. In focal states, what successes and challenges have states and institutions encountered in creating and implementing articulation agreements and supports? How have they addressed these challenges?

This analysis will rely on three types of data sources:

- **Telephone interviews.** One-on-one phone interviews will be conducted with 76 individuals including: faculty and college administrators from states’ two-year and four-year institutions of higher education; state higher education administrators; representatives from higher education governing bodies and ECE licensure bodies; and other individuals who are knowledgeable about development, implementation, and monitoring of ECE articulation policies and the ECE workforce.
- **Focus groups.** Virtual focus groups will be held in each of the six states, including student focus groups (with 24 students total) and focus groups of institutional support staff (with 20 staff total).
- **Review of extant documents.** These documents will include articulation policies, legislation, and governing body meeting notes.

Elements of Successful Articulation

To provide a framework for examining articulation policies and practices in the six focal states, the study convened a Technical Working Group (TWG) comprised of 12 technical experts who were responsible for defining elements of successful statewide articulation for higher education programs in early childhood education. Experts were chosen based on their experience with articulation policies and represented a variety of stakeholders, including two-year college faculty, four-year college faculty, policy representatives, higher education administrators, and early childhood representatives. The group met on April 3, 2017 at the Department headquarters in Washington, D.C., for a full-day meeting.

Based on input from the TWG, the study team created a framework for successful ECE articulation, including four core elements: 1) governance, 2) academic policy, 3) articulation agreements provisions, 4) articulation and transfer supports—each with between two to four sub-elements that describe practices and considerations from the field. Additionally, the TWG noted that it was important for states to consider their own policy contexts and the need for evaluation.

Exhibit 1. Elements of Successful Statewide Articulation and Statewide Considerations Identified by Technical Working Group

Governance	A governance structure that develops and then actively maintains articulation; components of governance include oversight, administration, and stakeholder involvement and coordination.
Academic policy	Consideration of a variety of academic policy and practice issues in both 2-year and 4-year institutions; components of academic policy include degree pathways, teacher licensure, faculty and curricular alignment, and accreditation.
Articulation agreement provisions	Specific provisions that facilitate credit transfer within articulation agreements; such provisions address the portability of credits, data sharing, and other issues.
Articulation and transfer supports	Providing students with transparent information, accessible resources and supports, and considers the costs of degree attainment.
State considerations	State policy contexts can influence the success of articulation efforts, and states’ investment in gathering data to evaluate the effectiveness of articulation can support refinement of articulation systems.

The section below further describes each of these elements.

Governance

Oversight and Administration

- Types of administrative bodies. Higher education governance structures at the state-level have an important influence on articulation, and the type of administrative body determines its ability to establish and enforce articulation policy. Examples of administrative bodies overseeing articulation include coordinating boards, governing boards, and higher education agencies.
- Monitoring implementation. Administrative bodies may monitor whether institutions of higher education are implementing articulation policies as intended.
- Updating policies. Administrative bodies may update articulation policies and processes regularly in response to changes in legislation and higher education policy.
- Enforcement and appeals process. Administrative bodies may oversee the appeals process for students who claim that the terms of the articulation agreement have been violated or who would like to appeal decisions about credit transfer at receiving institutions.
- Funding for administration. Dedicated, ongoing funding supports the work of the administrative body. This funding may cover the cost of staff support and pay members for the expense involved in attending committee meetings.

Stakeholder Involvement and Coordination

- Involvement of multiple sectors. Articulation policies are strengthened when stakeholders from a variety of sectors are involved in their development.
- Stakeholder types. Stakeholders for ECE articulation include internal stakeholders, such as higher education administrators, faculty, and students, and external stakeholders, such as ECE employers, ECE teachers, teacher licensing agencies, nonprofit organizations, and state government and policy representatives.
- Role of faculty. As content area experts, two- and four-year faculty can play an especially important role in the development of articulation agreements.

Academic Policy

Degree Pathways

- Multiple degree pathways. Students may follow a variety of degree pathways to a career in ECE. Articulation policies should be inclusive of these multiple pathways.
- Types of associate's degrees. Articulation policies may acknowledge these pathways by including various types of associates' degrees, such as associate of arts, associate of science, associate of applied science, and associate of arts in teaching. Additionally, some degrees may focus on training preschool teachers, while other degrees focus on training elementary school teachers.
- Stackable credentials. Stackable credentials can streamline the path to a degree. Some students begin with a certificate and then choose to pursue a degree. When courses associated with certificates are embedded in degree programs, students who choose to enroll for the degree are given full credit within the same institution.
- Dual enrollment programs. Articulation policies that allow credits earned in dual-enrollment programs (i.e., college credit earned while in high school) to count toward a degree can benefit transfer students. For example, high schools may form partnerships with community colleges that allow

students to acquire a CDA credential during high school and transfer the credits into a two-year program.

Teacher Licensure

- Degrees that lead to licensure. States and institutions should be transparent with students about which degrees lead to licensure and which do not, while taking into account that some ECE teaching positions do not require licensure.
- Multiple licensure options. In some states, there are multiple licensure options for an ECE career. Two- and four-year institutions should work together to ensure they are consistently applying standards for licensure in their courses.
- Competing demands. Two-year colleges may have competing demands, with some students pursuing ECE-related training, certificates, or associate degrees without teacher licensure and others earning credits with the hope of transferring into a four-year college in order to complete a bachelor's degree and additional certifications required for teaching. To the extent that the requirements of two-year ECE-related programs and bachelor's degree programs are not aligned, it may be difficult for two-year colleges to offer accessible and transparent pathways that serve the needs of all students. Misalignment could in turn also present challenges for allowing students to transfer credits from four-year to two-year institutions through reverse transfer.

Faculty and Curricular Alignment

- Curriculum and learning standards. Alignment of curriculum and learning standards between two- and four-year institutions helps facilitate seamless student transfer among institutions of higher education.
- Course competencies and numbering. Common course competencies and common course numbering are helpful for articulation between two- and four-year institutions.
- General education common core. The existence of a general education common core curriculum supports articulation.
- Faculty qualifications. When two-year faculty have similar academic qualifications as four-year faculty, the faculties may be more willing to enter into articulation agreements, due to a perception that courses at two-year institutions are equivalent to courses at four-year institutions.

Accreditation

- A symbol of quality. Accreditation of ECE programs may reduce barriers to articulation by validating the quality and rigor of ECE associate's degree programs.
- Encouragement for articulation. Institutional and programmatic accreditors, such as the National Association for the Education of Young Children, can encourage institutions to develop student-focused articulation policies.
- Mandate from licensing. When state educator licensing provisions require preparation programs at and beyond the baccalaureate level to receive both institutional and programmatic accreditation, those requirements may serve to reinforce specific articulation practices.

Articulation Agreement Provisions

Portability of Credits

- Block transfer. Transfer student degree progress is facilitated when articulation agreements specify that all lower division coursework, including general education and early childhood credits, will transfer into the four-year degree program as a block.

- Course-by-course transfer. Articulation agreements that require course-by-course review of prior coursework based on course equivalencies or allow only a limited number of credits to transfer from the sending institution can hinder student degree progress.
- Transfer without an associate's degree. Articulation agreements should allow students who choose to transfer from a two-year program to a four-year program before earning their associate's degree to earn transfer credit for their prior coursework.
- Reverse transfer. Reverse transfer provisions ensure that students who transfer from a two-year to a four-year institution, and then back into a two-year institution do not lose credit. Reverse transfer provisions could include the opportunity for two-year to four-year transfer students to complete an associate or certificate degree, even if they do not complete their bachelor's degree.

Data Sharing

- Electronic record sharing. In order to streamline articulation, transcripts should be shared electronically and systematically between two- and four-year institutions.
- Oversight of data sharing. The administrative body that oversees articulation also may oversee a shared data system between two-year and four-year institutions.

Other Provisions

- Guaranteed admission. Guaranteed admission into ECE programs at four-year institutions for students who complete associate's degrees can be a feature of successful articulation agreements.
- Private institutions. Inclusion of private institutions of higher education in articulation agreements increases the number of students who benefit from articulation agreements.

Articulation and Transfer Supports

Transparency and Accessibility

- Transparent information. Students require transparent, accessible information regarding transfer requirements, career pathways, and licensure options.
- Web-based transfer resources. Transfer guides and other Web-based resources such as online course catalogs and degree progress tools are important supports for students, advisors, and faculty.
- Accommodations for non-traditional students. Because many ECE students may also be working, institutions should consider the convenience and accessibility of courses and academic and student services.

Student Supports

- Transfer advising services. Transfer advising service centers at both sending and receiving institutions can promote student success and retention.
- Well-informed and resourced advisors. Before and during the articulation process, students can benefit from the support of well-informed faculty advisors and guidance counselors with reasonable caseloads. Such advisors can help students determine which degree pathways are best aligned to their personal and professional goals.

Completion and Affordability

- Importance of affordability. Statewide articulation policy should consider the affordability of earning a bachelor's degree.

- Cost of degree versus earning potential. The affordability of a bachelor's degree is particularly important for students in ECE programs because of the low wages that early childhood teachers earn.
- Dimensions of affordability. Affordability is determined by the total cost of earning a credential, including the cost of attendance, the cost of student debt, and opportunity cost of foregoing work while acquiring a degree.
- Stackable credentials. Stackable credentials may be an opportunity to help students increase their salaries as they acquire credentials.
- Dual-credit programs. Affordability in articulation agreements may be addressed by providing pathways for high school students to enter into dual-credit college courses as soon as possible to save money.

State Considerations

Policy Context

- Policy mandate. Successful statewide articulation is enabled by policies that mandate or facilitate articulation.
- Compulsory articulation agreements. State legislative or executive branch action can compel institutions of higher education to create articulation agreements when they might not have otherwise.
- Licensing policy. State policies for teacher licensing can make the pathways into an ECE career more or less flexible.

Economic Context

- Availability of funding. The economic context and availability of funding within a state influences articulation policy.
- Workforce needs. Articulation policy should take into account the state's ECE workforce needs and the demographics of the existing teaching workforce.

Evaluation and Evidence

- Purpose. Evaluation of articulation efforts may serve multiple purposes: (1) monitoring transfer student outcomes, (2) informing policy-makers about adjustments needed to articulation systems, (3) gathering data to make the case that articulation is needed.
- Data. Statewide longitudinal data systems that contain information about student transfer and course-taking behavior, along with information about credit transfer, help support evaluation of articulation policy.
- Transparency. The results of evaluations should be made publicly available.

One of the goals of this study is to highlight successful ECE articulation practices to inform the work of state and higher education leaders who are developing, revising, or implementing ECE articulation policies. The final report will highlight promising practices and the specific approaches, such as the sub-elements identified by the TWG, states have taken to successfully implement articulation policy, drawing on the experiences of stakeholders, including state higher education administrators and senior administrators, faculty, staff, and students in both two-year and four-year institutions of higher education in six focal states.

Supporting Statement for Paperwork Reduction Act Submission

Justification

1. Circumstances Making Collection of Information Necessary

As discussed in the Study Overview section, the purpose of this study is to identify elements that states have in place to enable successful articulation as early care and education (ECE) workers progress from an associate's degree to a bachelor's degree and describe states' successes and challenges in implementing the elements. Specifically, the study will use telephone interviews, virtual focus groups, and review of extant documents to examine ECE articulation policies and their implementation in six focal states (California, Florida, Indiana, Massachusetts, New Mexico, and Pennsylvania) that have statewide articulation policies addressing degrees or coursework in early childhood education. American Institutes for Research (AIR) is conducting this study on behalf of the Policy and Program Studies Service of the U.S. Department of Education (ED).

2. Use of Information

The data collected through this study will be used to prepare a report that highlights successful ECE articulation practices in six states in order to inform the work of state and higher education leaders who are developing, revising, or implementing ECE articulation policies. This final report will highlight promising practices and the specific approaches states have taken to successfully implement articulation policy, drawing on the experiences of stakeholders, including state higher education administrators and senior administrators, faculty, staff, and students in both two-year and four-year institutions of higher education in the six focal states. The report will be written in a manner suitable for distribution to a broad audience of policymakers and educators and will be accompanied by a two-page Results in Brief. ED will publicly disseminate the report via its website.

3. Use of Improved Technology to Reduce Burden

We will collect the interview data by phone. All materials and data will be securely stored electronically and clearly labeled with the date and time of the interview as well as with identifiers to indicate the specific grantee and interviewee and maintain confidentiality. With the permission of the participants, the interviews will be audio recorded and transcribed.

We will use GoToMeeting, a user-friendly system, as the platform for focus groups. To use this technology, all participants (including the interviewer) will log into the platform and enable their webcam. Students can use either their computer's audio or call in by telephone. To aid the discussion, the interviewer also will share his or her screen, displaying the discussion questions, so that participants can follow along. The facilitator will set norms and expectations before starting the focus groups, including allowing all participants to speak, not using the speakerphone, and muting yourself when not speaking. In addition, the interviewer will remind participants to state their name before speaking. GoToMeeting is capable of recording the session.

4. Efforts to Avoid Duplication of Effort

The U.S. Department of Education and the U.S. Department of Health and Human Services are coordinating to inform this study and there is no similar work happening in either agency. The study team will avoid duplication of effort by using extant data to guide the selection of focal states and institutions of higher education. In addition, the study team will avoid selecting sites for which case studies have already been conducted, except in cases where the extant case study does not go into the detail needed to address the

study's research questions or was completed so long ago that it would be useful to learn updated information about the site's work.

5. Efforts to Minimize Burden on Small Businesses and Other Small Entities

No small businesses or other small entities will be involved in this project.

6. Consequences of Not Collecting the Data

Failure to collect the data proposed through this study would prevent ED from providing information to assist state administrators, institutions of higher education, educators, and policymakers, and educators in improving the qualifications of early childhood educators and developing more seamless pathways to the baccalaureate. This study will enable state and institutional leaders interested in developing and strengthening their systems of articulation for governing transfer of course credits between public two- and four-year colleges and universities, by providing detailed information on how other states have approached this as well as their successes, challenges, and lessons learned in implementation of those policies.

7. Special Circumstances Causing Particular Anomalies in Data Collection

None of the special circumstances listed apply to this data collection.

8. Federal Register Announcement and Consultation

a. Federal Register Announcement

The Department will solicit public comments through a notice concerning this study to be published in the Federal Register. Any comments that are received will be shared with OMB.

b. Consultations Outside the Agency

To provide a framework for examining articulation policies and practices in the six focal states, the study convened a Technical Working Group (TWG) comprised of 12 technical experts. While serving on the TWG, the experts were responsible for defining elements of successful statewide articulation for higher education programs in early childhood education. Experts were chosen based on their experience with articulation policies and represented a variety of stakeholders, including two-year college faculty, four-year college faculty, policy representatives, higher education administrators, and early childhood representatives. The 12 technical experts and their affiliations are shown in Exhibit 2.

Exhibit 2. Members of Technical Working Group

Name	Title	Affiliation
David Atencio	Associate Professor, Individual, Family, and Community Education	University of New Mexico; New Mexico Early Childhood Higher Education Task Force
Dawn Braa	Instructor	Dakota County Technical College
Kathleen Bryan	Assistant Professor; Education Program Coordinator ECE Online	University of Cincinnati
Rebecca Carothers	Endowed Chair; Early Childhood Education Director	Ivy Tech Community College Northeast
Steve Handel	Associate Vice President for Undergraduate Admissions	University of California, Office of the President
Mary Harrill	Senior Director of Higher Education Accreditation and Program Support	National Association for the Education of Young Children
Jan Ignash	Vice Chancellor of Academic and Student Affairs	The State University System of Florida
Gail Joseph	Associate Professor, Educational Psychology; Director of the Early Childhood and Family Studies Program	University of Washington
Antoinette Mitchell	Assistant Superintendent, Postsecondary and Career Education	Office of the State Superintendent of Education, District of Columbia
Elena Quiroz-Livanis	Director of Academic Policy and Student Success	Massachusetts Department of Higher Education
Sue Russell	Executive Director	T.E.A.C.H. Early Childhood National Center
Tracye Strichik	Director, Office of Early Learning	Alabama Department of Early Childhood Education

The Technical Working Group met on April 3, 2017 at the Department headquarters in Washington, D.C., for a full-day meeting, at which the group identified elements of successful statewide articulation that provide a framework for this study's examination of articulation policies and practices in the six focal states.

9. Payment or Gift to Respondents

College students who participate in the focus groups will receive a \$75 gift card as a token of appreciation for their time and effort. Based on the literature, these incentives are expected to increase response rates and reduce the need for more costly survey follow-up (Singer & Ye, 2012). No additional funds will be sought for these incentives; other slight adjustments to the allocation of contract funding will be made in order to free up the funds for the incentive payments.

10. Assurance of Confidentiality

The study team is concerned with maintaining the confidentiality and security of its records. The project staff have extensive experience collecting information and maintaining the confidentiality, security, and integrity of survey data. All members of the study team have obtained their certification on the use of human subjects in research. This training addresses the importance of the confidentiality assurances given to respondents and

the sensitive nature of handling data. The team also has worked with the contractor's Institutional Review Board (IRB) to seek and receive approval of this study, thereby ensuring that the data collection complies with professional standards and government regulations designed to safeguard research participants.

The following data protection procedures will be in place:

- The study team will protect the identity of individuals from whom we will collect data for the study and use the data for research purposes only. Respondents' names will be used for data collection purposes only and will be disassociated from the data prior to analysis.
- Although this study does not include the collection of sensitive information (the only data to be collected directly from respondents is focused on state policies and practices within institutions of higher education), a member of the research team will explain to participants what will be discussed, how the data will be used and stored, and how their confidentiality will be maintained. Participants will be informed that they may stop participating at any time. The study's goals, data collection activities, participation risks and benefits, and uses for the data are detailed in an informed consent form that all participants will read and prior to beginning any data collection activities. At the beginning of the interview, respondents will be asked to consent to study participation based on the terms and conditions outlined in the written consent form.
- All electronic data will be protected using several methods. The contractors' internal networks are protected from unauthorized access, including firewalls and intrusion detection and prevention systems. Access to computer systems is password protected, and network passwords must be changed on a regular basis and conform to the contractors' strong password policies. The networks also are configured so that each user has a tailored set of rights, granted by the network administrator, to files approved for access and stored on the local area network. Access to all electronic data files and workbooks associated with this study is limited to researchers on the case study data collection and analysis team.
- The data collected will be used to summarize findings in an aggregate manner (across groups or sites), or to provide examples of program implementation. The study team will not use participants' names in any reports, although states, agencies, institutions of higher education, and/or job roles or titles may be named in some sections of the report.
- Because the focus of the study is on state and institutional policies that are public and not sensitive in any way, the study team expects this study poses minimal risk to participants.

11. Sensitive Questions

No questions of a sensitive nature are included in this study.

12. Estimated Response Burden

The total number of respondent burden hours for this study is estimated as 305 hours, including gaining the cooperation from states, higher education institutions, and other study participants, as well as participating in the telephone interviews and focus groups. This amounts to an estimated cost of \$10,562.83 and is based on the estimated average hourly wages of participants (see Exhibit 3).

Exhibit 3. Summary of Estimated Response Burden

Activity	Sample Size	Expected Response Rate	Number of Respondents	Average Burden Time (minutes)	Total Burden (hours)	Estimated Respondent Average Hourly Wage ¹	Estimated Respondent Burden Time Cost
Recruitment							
State Administrators responsible for transfer policy	15	100%	15	15	3.75	\$ 65.23	\$ 244.62
State policy staff involved in ECE articulation	4	100%	4	15	1	\$ 65.23	\$ 65.23
State Governing body members	7	100%	7	15	1.75	\$ 65.23	\$ 114.15
IHE Faculty	20	100%	20	15	5	\$ 34.95	\$ 174.75
IHE Administrators	20	100%	20	15	5	\$ 58.88	\$ 294.40
IHE Support Staff	60	100%	60	60	60	\$ 20.12	\$ 1207.20
ECE workforce industry representative	6	100%	6	15	1.5	\$ 20.12	\$ 30.18
ECE workforce teacher licensing agency representative	4	100%	4	15	1	\$ 20.12	\$ 20.12
IHE students	24	100%	24	15	6	\$ 7.25	\$ 43.50
IHE IRB study staff approval	20	100%	20	480	160	\$ 34.95	\$ 5,592.00
Total for Recruitment	140	-	140	-	205	-	\$ 6,981.35
Data Collection							
State Administrator responsible for transfer policy interview	15	100%	15	45	11.25	\$ 65.23	\$ 733.84
State policy staff involved in ECE articulation interview	4	100%	4	45	3	\$ 65.23	\$ 195.69
State Governing body members interview	7	100%	7	45	5.25	\$ 65.23	\$ 342.46
IHE Faculty interview	20	100%	20	60	20	\$ 34.95	\$ 699.00
IHE Administrator interview	20	100%	20	45	15	\$ 58.88	\$ 883.20
IHE Support Staff focus group	60	100%	60	60	60	\$ 20.12	\$ 1207.20
ECE workforce industry representative interview	6	100%	6	45	4.5	\$ 20.12	\$ 90.54
ECE workforce teacher licensing agency representative interview	4	100%	4	45	3	\$ 20.12	\$ 60.36
IHE students focus group	24	100%	24	60	24	\$ 7.25	\$ 174.00
Total for Data Collection	120	-	120	-	106	-	\$ 3,581.49
TOTAL	140	-	140	-	311	-	\$10,562.83
TOTAL ANNUALIZED BURDEN	46.7	-	46.7	-	103.7	-	\$3,520.94

¹The average hourly earnings were provided using national, unleveled estimates provided in the 2016 Modeled Wage Estimates sponsored by the Bureau of Labor Statistics (BLS). The exception is the IHE student wage, which is based on the federal minimum wage. Source: BLS Modeled Wage Estimates, <https://www.bls.gov/mwe/#data>; accessed on September 6, 2017.

13. Estimate of Annualized Cost for Data Collection Activities

No additional annualized costs for data collection activities are associated with this data collection beyond the hour burden estimated in item 12.

14. Estimate of Annualized Cost to Federal Government

The estimated cost to the federal government for this study, including development of the data collection plan and data collection instruments, sample selection and recruitment, as well as data collection, analysis, and report preparation, is \$550,000 over 25 months (annualized at \$264,000).

15. Reasons for Changes in Estimated Burden

This is a new collection so all burden hours are considered program changes.

16. Plans for Tabulation and Publication

Findings from the study will be published in a final report. The final report is expected to be cleared for released in Winter 2019 and will be made publicly available on ED's website as well as the contractor's website. It will also be disseminated through ED's public communication channels and through the contractor's external contacts (newsletter and web logs) and directly to all participants in the study.

17. Display of Expiration Date for OMB Approval

All data collection instruments will display the OMB approval expiration date.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I are requested.

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