Middle Grades Longitudinal Study of 2017-18 (MGLS:2017) Main Study Design Revision, Operational Field Test First Follow-up (OFT2) and Second Follow-up (OFT3), and Main Study Base Year (MS1) and Tracking for First Follow-up (MS2)

OMB# 1850-0911 v.20

Supporting Statement Part A

National Center for Education Statistics U.S. Department of Education Institute of Education Sciences Washington, DC

July 2017 revised August 2018

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Preface

The Middle Grades Longitudinal Study of 2017-18 (MGLS:2017) is the first study conducted by the National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES) of the U.S. Department of Education, to follow a nationally representative sample of students as they enter and move through the middle grades (grades 6–8). In preparation for the national data collection, referred to as the Main Study (MS), the data collection instruments and procedures were field tested.

An Item Validation Field Test (IVFT) was conducted from January through May 2016 (OMB# 1850-0911 v. 3-5,7-9) to determine the psychometric properties of assessment and survey items and the predictive potential of items so that valid, reliable, and useful assessment and survey instruments could be developed for the Main Study. The MGLS:2017 Operational Field Test (OFT) Base Year (OFT1) data collection was conducted from January through May 2017 (OMB# 1850-0911 v. 6,10-14) to test the near-final instruments and recruitment and data collection procedures and materials in preparation for the MGLS:2017 Main Study Base Year (MS1). Tracking of students and associated recruitment of schools for the OFT First Follow-up (OFT2) data collection began in August 2017. The primary purpose of OFT2 was to: (a) obtain information on recruiting, particularly for students in three focal IDEA-defined disability groups: specific learning disability, autism, and emotional disturbance; (b) obtain a tracking sample that can be used to study mobility patterns in subsequent years; and (c) test protocols, items, and administrative procedures. The MS1 district and school recruitment began in February 2017. The MS1 and OFT2 data collections took place from January to July 2018.

OMB approved the MGLS:2017 OFT1 data collection, MS1 recruitment, and OFT2 tracking materials and procedures in December 2016 with change requests approved through June 2017 (OMB# 1850-0911 v.11-15). OMB also approved the MGLS:2017 MS1 and OFT1 data collections, and MS2 tracking and recruitment in October 2017, with the latest change request approved in April 2018 (OMB# 1850-0911 v. 16-19). Originally, NCES planned for MGLS:2017 to conduct annual main study follow-up data collections first beginning in January 2019 and next beginning in January 2020, when most of the students in the sample will be in grades 7 and 8, respectively. However, due to lower than expected response rates experienced in the sixth grade data collection, this request is to: (1) schedule the MS2 data collection for January-July 2020 (when most sample students will be in the eighth grade) instead of January-July 2019 (thus dropping the originally planned seventh grade round of data collection), (2) notify participating districts and schools of this change in data collection schedule, (3) discontinue the procedures designed to oversample students in specific IDEA-defined disability groups, and (4) conduct MS2 and OFT3 tracking activities.

Due to overlap in activities at the time of the initial submission of this request in 2017, the then approved MS1 recruitment and OFT2 tracking activities were being carried over in this submission, and thus this submission includes the procedures, materials, and associated respondent burden for all activities related to MS1 and OFT2, as well as those related to MS2 tracking and recruitment.

Detail of the August 2018 Revision Request

While two annual follow-ups beginning in January 2019 and subsequently in January 2020 were planned for when most of the students in the sample would be in grades 7 and 8, respectively, participation rates in the base year were substantially short of targets. Analyses of the respondent sample sizes indicate that the number of participants is inadequate to meet the precision requirements for several key subgroups of students by the end of the study. This request, with its accompanying 30-day public comment period, is to revise the MGLS:2017 follow-up data collection plan and procedures. The requested changes are needed to meet the overall study goal, given current schedule and budgetary constraints, to obtain data on the progress of students starting in grade 6 and ending in grade 8 in general education schools. A second request will be submitted in October 2018, with another 30-day public comment period, to augment the MGLS:2017 sample by recruiting new schools and students in order to achieve sufficient sample sizes to meet precision requirements. This second request will include the final versions of the respondent materials and procedures to be used during the MS2 recruitment that will begin in January 2019.

This request is to: (1) eliminate the data collection planned for January through July 2019, when most of the MGLS:2017 sample students will be in grade 7, and conduct one follow-up collection (MS2) from January through July 2020, when most students will be in grade 8; (2) notify participating districts and schools of this change in data collection schedule; (3) discontinue further oversampling of students with Individualized Education

Programs (IEPs) by disability categories; and (4) conduct MS2 and OFT3 tracking activities with MS and OFT sample schools and parents, respectively, during the 2018-19 school year. The requested changes will reduce the overall estimated respondent burden by eliminating one round of data collection but, due to higher-than-expected costs associated with recruiting, do not reduce the total cost to the federal government. More detail for each requested change follows below.

(1) Eliminate the data collection planned for January through July 2019, when most of the MGLS:2017 sample students will be in grade 7, and conduct one follow-up collection (MS2) from January through July 2020, when most students will be in grade 8. Despite many strategies designed to maximize MS1 response rates, as described in section B.2 of the OMB# 1850-0911 v.19 Supporting Statement Part B, the MS1 school response rate fell substantially short of targets, at about 40 percent. The currently achieved sample of approximately 570 schools and about 14,000 students is not sufficient to meet precision requirements by the end of the study for the standard reporting groups typically studied with NCES longitudinal studies, including by key race/ethnicity subgroups, Census regions, and school locale. It also does not support analyses of students with specific disabilities, a feature NCES tried to add for the first time in MGLS:2017. Sample augmentation, that is, adding new schools and students to the study who did not participate in the base-year data collection, is needed to meet end-of-study sample size requirements for certain subgroups of students, including Black non-Hispanic students, students living in the Northeast, students attending schools in towns, and several others. Without sample augmentation, NCES will not be able to report national-level estimates for students in these groups. In order to have adequate time to develop a sound sample augmentation plan, recruit new schools and students into the study, and conduct this work within current budget constraints, we request approval to drop the planned grade 7 data collection and instead to conduct the first, and only, MGLS:2017 follow-up data collection during the 2019-20 school year when most students will be in grade 8.

Regarding sample augmentation, preliminary analyses indicate that in order to achieve acceptable sample sizes for MGLS:2017, approximately 200 to 250 new schools will need to be added to the study. These schools may be drawn from the existing reserve sample selected for the study. However, it may also be necessary to select an additional set of schools that educate students beginning in grade 8. Final details of this additional sample will be provided in the subsequent, October 2018 request (OMB# 1850-0911 v.21).

- (2) **Notify participating districts and schools of this change in data collection schedule.** Participating MS1 school districts and schools expect study staff to begin contacting them in the fall of 2018 to plan for a January-July 2019 data collection. Therefore, we need to communicate to districts and schools as soon as possible that MGLS will not be conducted in their school in the first half of 2019. This request provides the additional letters required for such notification (see revised Appendices A-S). All other types of communication and recruitment materials (including notification of this change to parents) will be provided in the subsequent, October 2018 request (OMB# 1850-0911 v.21).
- (3) Discontinue further oversampling of students with Individualized Education Programs (IEPs) by disability categories. MGLS:2017 was designed to include oversamples of students with IEPs in two IDEA-defined categories, Autism and Emotional Disturbance. The purpose of these oversamples was to obtain enough cases for students in these groups to generate reliable estimates for each. MGLS:2017 is the first NCES study to include this feature as part of its sample design. As is the case in some of the other NCES studies, NCES expected to provide, without oversampling, reliable estimates for students in a third disability category, Specific Learning Disability. However, the low sixth-grade school participation rate resulted in significantly smaller numbers of cases in these groups than necessary to meet precision requirements. Reliable estimates for students with emotional disturbance cannot be produced for sixth grade. In addition, given available time and budget, sample augmentation cannot be used to increase sample sizes to necessary levels in a grade 8 collection for any of these three groups.

Because information about students' specific disability was needed at the sampling stage of the study to select the oversamples, this information was requested from schools for all students in sixth grade at the time student enrollment lists were collected. This contrasted with other NCES studies, which collect disability information only for students selected for the study sample. Asking for this information for all enrolled students harmed school participation. Many schools expressed concern about the legal implications of providing this level of information about all students, even though the law allows the information to be provided for the purposes of this study. Approximately 90 schools that had initially agreed to participate

opted out after learning of this requirement, and many schools never agreed to participate in the first place for this reason. Another difficulty in recruiting a sufficient sample of students with IEPs was that the numbers of students listed as having IEPs in participating schools were far below those expected based on the information about public schools in the U.S. Department of Education's EDFacts datasets.

In sum, it is not possible to achieve the necessary sample sizes to meet study precision requirements for students in the three study focal disability groups in grade 8, and asking for specific disability information at the time of sampling depresses participation rates for schools, which could jeopardize the planned sample augmentation. For these reasons, we request approval to discontinue further oversampling of students in these groups. MGLS will continue to include information about students with IEPs as is standard in many NCES longitudinal studies. Current participants will be retained in the study and followed into grade 8 at 100%. Additional students with these specific disabilities, as well as students with an IEP for any disability, may still become part of the study through the augmentation sample planned for grade 8. The study will continue to collect information on educational experiences of all students, including of students in special education, and information will continue to be collected from sampled students' special education teachers. It is anticipated that NCES will be able to generate reliable estimates for all students with an IEP, as has been done in other NCES studies.

(4) Conduct MS2 and OFT3 tracking activities with MS and OFT sample schools and parents, respectively, during the 2018-19 school year. The period of OFT student tracking was envisioned to take place for the OFT First Follow-up (OFT2) from August 2017 through May 2018, and for the OFT Second Follow-up (OFT3) from August 2018 through May 2019. OFT tracking is important for understanding patterns in MGLS:2017 sample students' transfers from one school to another and our ability to locate sample students for the next follow-up data collection (from grade 7 to grade 8 in OFT3). Given that MGLS:2017 Main Study will not collect data in grade 7, tracking information will become even more important for designing the final materials and procedures for MS2. As with all OFT recruiting and tracking activities, the OFT dates need to mirror and precede by one year those planned for the Main Study. This request provides the additional letters required for OFT3 tracking (see revised Appendices A-S) and, due to the current clearance schedule, indicates that OFT3 tracking will take place from September 2018 through May 2019.

MS2 tracking will take place from September 2018 through May 2020 and will be carried out in multiple rounds. The final details of the MS2 tracking plan, particularly the activities to take place in 2019 and 2020, will be provided in the October 2018 submission (OMB# 1850-0911 v.21). MS2 data collection will occur from January through July of 2020.

Part A of this submission presents information on the basic design of MS1, MS2 tracking, OFT2, and OFT3 tracking. Part B discusses the statistical methods employed, and Part C provides content and item justifications for the MGLS:2017 student, parent, math teacher, special education teacher, and school administrator questionnaires, as well as the facilities observation checklist. Appendices MS1-A through S provide the MS1 communication materials; Appendices OFT2-A through L the OFT2 communication materials; Appendices MS2-A through L the MS2 tracking materials (with MS2A through B1, district and school notification letters, having been revised in August 2018, for this request); and newly added, in August 2018, Appendices OFT3-A through H which provide the OFT3 tracking materials. Appendices T-W provide the already approved MS1 and OFT2 data collection instruments and the communication materials used during the data collection window.

A. Justification

A.1 Importance of Information

As a study of the middle grades, MGLS:2017 will complement NCES's plans for implementing a multi-cohort sequence for a longitudinal studies series. By aligning the Early Childhood Longitudinal Study Kindergarten Class of 2010–11 (ECLS-K:2011), MGLS:2017, and the next High School Longitudinal Study (HSLS), NCES will be able to collect, within a 10-year span, a full range of data on students' school experiences as the students enter and then transition from elementary school into high school. Given its portfolio and experience in national longitudinal education studies, NCES is uniquely positioned to undertake this comprehensive, large-scale, longitudinal study of a nationally representative sample of middle grade youth that includes measures of known critical influences on adolescents' academic and socioemotional trajectories. NCES is authorized to conduct MGLS:2017 by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. \$9543) and to collect students' education records

from education agencies or institutions for the purposes of evaluating federally supported education programs under the Family Educational Rights and Privacy Act (FERPA, 34 CFR \$\$99.31(a)(3) and 99.35).

MGLS:2017 will rely on a set of longitudinal and complementary instruments to collect data across several types of respondents to provide information on the outcomes, experiences, and perspectives of students for grades 6 through 8; their families and home lives; their teachers, classrooms, and instruction; and the school settings, programs, and services available to them. At each wave of data collection in the main study, students' mathematics and reading skills, socioemotional development, and executive function will be assessed. Students will also complete a survey that asks about their engagement in school, out-of-school experiences, peer group relationships, and identity development. Parents will be asked about their background, family resources, and involvement with their child's education and their school. Students' mathematics teachers will complete a two-part survey. In part 1, they will be asked about their background and classroom instruction. In part 2, they will be asked to report on the academic behavior, mathematics performance, and classroom conduct of each study child in their classroom. For students receiving special education services, their special education teacher or provider will also complete a survey similar in structure to the two-part mathematics teacher instrument, consisting of a teacher-level questionnaire and a student-level questionnaire, but with questions specific to the special education experiences of and services received by the sampled student. School administrators will be asked to report on school programs and services, as well as on school climate.

With data collection occurring in two rounds beginning in the winter/spring 2018 and finishing in 2020, MGLS:2017 will provide rich descriptive data on academic experiences, development, and learning that occur during these critical, middle grade years (grades 6–8), and on the individual, social, and contextual factors that are related to development and future success, thereby allowing researchers to examine associations between various factors and student outcomes. A wealth of research highlights the importance of mathematics and literacy skills for success in high school and subsequent associations with later education and career opportunities. Thus, MGLS:2017 will focus on student achievement in these areas, along with measures of student socioemotional well-being and other outcomes. The study will also collect data on educational experiences, outcomes, and special education services of students with disabilities as a group.

Due to insufficient participation by schools, in MS1 in 2018, MGLS:2017 must undergo design changes including two significant changes – discontinuation of targeted (for oversample) recruitment of students in the autism and emotional disturbance subgroups and the elimination of the grade 7 data collection.

A key goal of the study is to provide researchers and policymakers with the information they need to better understand the school and non-school influences associated with mathematics and reading success, socioemotional health, and positive life development during the middle grade years and beyond.

To support the development of the study, MGLS:2017 has conducted two field tests: the IVFT was conducted from February through May 2016 and was followed by OFT1, which took place from January through May 2017. The goal of the IVFT was to evaluate and inform the development of reliable, valid measures, while OFT1 focused on testing MGLS:2017 Base Year materials and procedures and on refining the recruitment techniques to obtain the needed nationally representative sample and better data quality. MS1 and OFT2 were conducted from January through July 2018. OFT2 provided an opportunity to do further refinement of surveys and assessments and test out the procedures for recruiting schools, tracking students, and collecting student data in and out of the school setting.

A.2 Purposes and Uses of Data

MGLS:2017 will provide nationally representative data related to students' transitions from elementary school to the middle grades, on the preparations for transitions into high school, and their academic, social, and interpersonal growth during the middle grades. MGLS:2017 will culminate in a rich data set that can be used by researchers, educators, and policymakers to examine family and educational factors related to student achievement. In addition to studying students in the middle grades more generally, educators and policymakers will also be able to use the resulting data to examine the effectiveness of services provided to students in three focal disability groups. The longitudinal nature of the study will allow for analyses of changes in young people's lives and of how their connections with their communities, schools, teachers, families, and peers affect these changes.

The study is guided by a conceptual framework that emphasizes the complex interrelationships that help shape

students' development and learning, ultimately supporting their academic success and positive development for success in life. MGLS:2017 is designed around a framework of research questions, including:

- 1. How do students develop cognitively (with respect to executive function and academic achievement), socially, and emotionally in the middle grades? What school and nonschool factors are associated with that development?
- 2. What school and home environment factors are associated with students' cognitive development and executive function?
- 3. What school and home environment factors are associated with students' regulation and engagement, social skills and behaviors, externalizing problem behaviors, and academic performance?
- 4. What is the nature of students' identity development (including aspirations, peer relationships, and goals) across the middle grades? How does identity development influence school engagement and motivation?
- 5. What school and home environment factors are related to the academic success of students with various risk factors often associated with lower academic achievement, such as poverty and low parent education?
- 6. What are students' experiences making the transition from elementary to middle grades? How do parents, teachers, and schools support this transition, as well as the transition from middle grades to high school?
- 7. What school and home environment supports are available to middle grade students for setting education pathways and pursuing career goals?

The purpose of MGLS:2017 is to provide data that support the exploration of research interests across disciplines, which will in turn deepen the knowledge base and inform policy and practice. In addition, MGLS:2017 will provide education researchers with data that are currently unavailable: nationally representative longitudinal data focusing specifically on the middle grades.

The study design includes direct measurement of students during a student session that includes the following assessments and surveys:

Reading. The MGLS:2017 reading assessment will provide valuable information about the reading achievement of students in grades 6-8 with a focus on reading comprehension. The reading assessment will provide valuable information on the development of middle grades students' reading comprehension and ability to integrate information from different sources. It is anticipated that these skills will be essential in various content areas as students move into high school.

Mathematics. The mathematics assessment is designed to measure growth toward algebra readiness in anticipation of the demands students will encounter in high school mathematics coursework. The mathematics assessment will provide valuable information about the development of middle grades students' knowledge of mathematics and their ability to use that knowledge to solve problems, moving toward stronger reasoning, and understanding of more advanced mathematics.

Executive Function. Executive function, a set of capacities and processes originating in the prefrontal cortex of the brain, permits individuals to self-regulate, engage in purposeful and goal-directed behaviors, and conduct themselves in a socially appropriate manner. Self-regulation is needed for social success, academic and career success, and good health outcomes. Executive function includes capacities such as shifting (cognitive and attention flexibility), inhibitory control, and working memory.

Student Survey. The purpose of the student survey is to collect information on students' attitudes and behaviors, out-of-school time use, and family, school, and classroom environments. The student survey will also serve as a source for information about socioemotional outcomes having to do with social relationships and support and academic engagement. These data augment the information collected from the mathematics, reading and executive function assessments to provide a deeper understanding of the social and contextual factors related to students' academic and non-academic outcomes.

Height and Weight. Measuring students' height and weight provides data to assess body mass index as an

indicator of obesity, pubertal timing (i.e., growth spurt), and eating disorders 12.

Student data will be supplemented by data collected from students' parents, teachers, and school administrators:

Parent Survey. The purpose of the parent survey is to collect information about: 1) family involvement in their child's education and 2) family characteristics that are key predictors of academic achievement and other student outcomes.

Mathematics Teacher Survey. The purpose of the mathematics teacher survey is to gather information on the teaching and mathematics classroom context for use in understanding students' development and mathematics learning during the middle grades. Teachers also rate the sampled students on their math ability.

Special Education Teacher Survey. The purpose of the special education teacher survey is to gather information on the teaching and classroom context for students with disabilities during the middle grades and to learn more about services offered in schools.

School Administrator Survey. The purpose of the school administrator survey is to provide context for school factors that influence student development, motivation, and mathematics learning.

Facilities Observation Checklist. The facilities observation checklist for the school setting will be used to document the condition of the physical plant and the availability of resources. This information will be collected by field staff and will complement the School Administrator Survey.

Further detail on the assessment and survey content is found in Part C. For more information on the data collection from different types of respondents see Part B.

A.3 Use of Improved Information Technology (Reduction of Burden)

Where feasible, available technology will be used to reduce burden and improve efficiency and accuracy. For example, if districts can provide information linking students to their mathematics teachers or students with disabilities to their special education teachers electronically, we will use this information rather than asking for it at the school level. The burden of recruitment on districts and schools will be minimal, with most information gathered over the telephone. Districts will primarily be asked to provide confirmation of data gathered from other sources, including school universe files and district and school websites. Our collection of student lists will accommodate whatever format districts and schools find to be the least burdensome. The study will utilize the information in any format in which it is provided.

The student assessments and survey will be completed on a Chromebook, a tablet-like computer with touchscreen capability and an attached keyboard. The computerized assessment is made possible by connecting the Chromebooks to an independent local access network (LAN) housed on a laptop computer set up at the school by study field staff. All equipment is provided by the study, and neither the school's internet access nor any internet access in general is required for the computerized administration of the student session.

The parent and school staff questionnaires will be fielded as web surveys. Web surveys will also be used for MS1 students in schools that only allow an "out-of-school" data collection and for OFT2 students that require "out-of-school" data collection because they attend schools with fewer than 4 sample members. Out-of-school data collection will also be conducted with MS2 students (a) who left their MS1 school and do not attend a school with 4 or more student sample members and (b) those who missed the in-school session. Using this data collection mode will allow for automatic routing of respondents through the surveys, which contain some instances of complex question branching. The automatic routing reduces respondent burden by producing faster interviews. The respondent will not be asked inapplicable questions and will not need to spend time determining which questions to answer. Also, electronic capture of responses reduces processing time and the potential for data entry error.

The website for data collection will reside on NCES's SSL-encrypted servers. On a nightly basis, the data collection contractor, RTI, will download interview data, in batches, to its Enhanced Security Network (ESN) via a secure

¹ Le Grange, D., Doyle, P. M., Swanson, S. A., Ludwig, K., Glunz, C., & Kreipe, R. E. (2012). Calculation of Expected Body Weight in Adolescents with Eating Disorders. *Pediatrics*, 129(2), e438–e446.

² University of Chicago Medical Center. (2012-01-04). Calculating Weight in Children with Eating Disorders - Experts Urge BMI Method. Retrieved 2017-10-29, from https://www.disabled-world.com/health/eating-disorders/bmi-method.php

web service. Once in the ESN, data will be cleaned and undergo quality analysis.

A computer-based data management system will be used to manage the sample. The sample management system uses encrypted data transmission and networking technology to maintain timely information on respondents in the sample, including contact, tracking, and case completion data. This system will be particularly important as students move from one school to another over the course of the study. The use of technology for sample management will maximize tracking efforts, which should have a positive effect on the study's ability to locate movers and achieve acceptable response rates.

A.4 Efforts to Identify Duplication

MGLS:2017 will not be duplicative of other studies. While NCES longitudinal studies have contributed to our understanding of the factors that influence student success and failure in school, no NCES study has yet collected data across the middle grades (grades 6–8). A majority of nationally representative longitudinal studies have focused on high school students and on the transition from secondary to postsecondary education: e.g., the High School and Beyond Longitudinal Study (HS&B) and the Education Longitudinal Study of 2002 (ELS:2002). The Early Childhood Longitudinal Study, Kindergarten Class of 1998–99 (ECLS-K) and the National Education Longitudinal Study of 1988 (NELS:88) collected data on students in grade 8, but neither included a data collection in grades 6 and 7. The ECLS-K:2011 does not plan to follow students beyond grade 5, and the High School Longitudinal Study of 2009 (HSLS:09) began with a national sample of students in grade 9. Thus, there is little information at the national level about the learning that occurs during grades 6–8 and about the rates of learning for different groups of students who may experience diverse school environments and opportunities.

MGLS:2017 is unique in that it will assess students' mathematics and reading achievement, as well as other student outcomes (e.g., executive function and socioemotional development), for the same group of students over a 3-year period. In addition to ECLS-K and NELS:88, other national studies have assessed some of these outcomes for students in grade 8, including the National Assessment of Educational Progress (NAEP) and the Trends in International Mathematics and Science Study (TIMSS). These studies, however, are cross-sectional and do not include repeated measures of achievement or assess multiple subjects and areas of development for the same sample of students. Therefore, they cannot answer questions about students' growth in mathematics and reading over the middle grade years, about differences in the rates of growth for different populations (e.g., differences by sex, by race/ethnicity, and for students attending public and private schools), and about the school and nonschool factors that may facilitate or hinder this growth. Nor can they explore questions about the relationships between student achievement and other school outcomes and executive functions (e.g., working memory, attention, and inhibitory control) that work to regulate and orchestrate cognition, emotion, and behavior to enable a student to learn in the classroom. MGLS:2017 will also be unique in its inclusion of oversamples of students on the autism spectrum or who have emotional disturbance. These oversamples will allow those students, as well as students in the largest IDEA-defined category, specific learning disability, to be studied as separate groups and be compared to general education students over the three middle level years.

Other adolescent development studies have been conducted, but they often do not include a grade 6 sample. For example, the youngest children in the National Longitudinal Study of Adolescent Health (Add Health) and the Maryland Adolescent Development in Context Study (MADICS) were in grade 7 at baseline. Many of these studies collected data on local samples, had a primary focus on family and child processes, and were started in the 1990s: e.g., MADICS and the Michigan Study of Adolescent and Adult Life Transitions (MSALT). As such, they do not provide a contemporary picture of U.S. students in grades 6–8.

A.5 Minimizing Burden for Small Entities

Burden will be minimized wherever possible. During district and school recruitment, we will minimize burden by training recruitment staff to make their contacts as straightforward and concise as possible. The recruitment letters and materials (e.g., the study description and FAQs) are designed to be clear, brief, and informative. In addition, contractor staff will conduct all test administration and will assist with parental notification, sampling, and other study tasks as much as possible within each school.

A.6 Frequency of Data Collection

The MGLS:2017 MS1 data collection will take place from January through July of 2018. Tracking activities for OFT2 will occur from August 2017 through May 2018, and data collection from January through July of 2018. Tracking activities for OFT3 will occur from September 2018 through May 2019. MS2 tracking will take place

from September 2018 through May 2020 and will be carried out in multiple rounds. The final details of the MS2 tracking plan, particularly the activities to take place in 2019 and 2020, will be provided in the October 2018 submission (OMB# 1850-0911 v.21). MS2 data collection will occur from January through July of 2020.

A.7 Special Circumstances

There are no special circumstances involved with this study.

A.8 Consultations outside NCES

Content experts have been consulted in the development of the assessments and questionnaires. These experts are listed by name, affiliation, and expertise in table 1.

Table 1. Members of the MGLS:2017 Content Review Panels

Name	Affiliation	Expertise
Mathematics	Assessment Content Revie	ew Panel (June 18-19, 2013)
Tom Loveless	Brookings Institution	Policy, mathematics curriculum
Linda Wilson	Formerly with Project 2061	Mathematics education, mathematics assessment, middle school assessment, author of NCTM Assessment Standards for School Mathematics and NAEP math framework, teacher
Kathleen Heid	University of Florida	Mathematics education, use of technology, teacher knowledge, NAEP Grade 8 Mathematics Standing Committee member
Edward Nolan	Montgomery County Schools, Maryland	Mathematics curriculum and standards, large-scale assessment of middle grade students
Lisa Keller	University of Massachusetts, Amherst	Psychometrics, former mathematics teacher
Paul Sally	University of Chicago	Mathematics education, mathematics reasoning, mathematically talented adolescents
Margie Hill	University of Kansas	Co-author of Kansas mathematics standards, former NAEP Mathematics Standing Committee member, former district math supervisor
Executive Fur	nction Content Review Pane	el (July 18, 2013)
Lisa Jacobson	1	Development of executive functioning skills, attention, neurodevelopmental disorders, and parent and teacher scaffolding
Dan Romer	University of Pennsylvania	Adolescent risk taking
James Byrnes	Temple University	Self-regulation, decision making, cognitive processes in mathematics learning
Socioemotion	nal-Student-Family Content	Review Panel (July 25–26, 2013)
James Byrnes	Temple University	Self-regulation, decision making, cognitive processes in mathematics learning
Russell Rumberger	University of California, Santa Barbara	School dropouts, ethnic and language minority student achievement
Tama Leventhal	Tufts University	Family context, adolescence, social policy, community and neighborhood indicators
Susan Dauber	Bluestocking Research	School organization, educational transitions, urban education, parent involvement and family processes
Scott Gest	Pennsylvania State University	Social networking, social skills, longitudinal assessment of at-risk populations
Kathryn Wentzel	University of Maryland	Social and academic motivation, self-regulation, school adjustment, peer relationships, teacher-student relationships, family-school linkages
Richard Lerner	Tufts University	Adolescent development and relationships with peers, families, schools, and communities
School Admin	nistrator Content Review Pa	anel (August 16, 2013)
Susan Dauber	Bluestocking Research	School organization, educational transitions, urban education, parent involvement and family processes
George Farkas	University of California, Irvine	Schooling equity and human resources
Jeremy Finn	State University of New York at Buffalo	School organization, school dropouts

Name	Affiliation	Expertise
Edward	Montgomery County	Large urban school system administrator
Nolan	Schools, Maryland	Large urbarr school system aurilinistrator
	Brookings Institution	Policy, math curriculum
	ssment Content Review Pa	
Donna Alvermann	University of Georgia	Adolescent literacy, online literacy, codirector of the National Reading Research Center (funded by the U.S. Department of Education)
Joseph Magliano	Northern Illinois University	Cognitive processes that support comprehension, the nature of memory representations for events depicted in text and film, strategies to detect and help struggling readers
Sheryl Lazarus	University of Minnesota	Education policy issues related to the inclusion of students with disabilities in assessments used for accountability purposes, student participation and accommodations, alternate assessments, technology-enhanced assessments, teacher effectiveness, large-scale assessments, school accountability, research design (including cost analyses), data-driven decision making, rural education, the economics of education
Disabilities Co	ontent Review Panel (April	29, 2014)
Jose Blackorby	SRI International	Autism, specific learning disabilities, special education, curriculum design, alternate student assessment, large-scale studies of students with disabilities, codirector of the Special Education Elementary Longitudinal Study (SEELS)
Lynn Fuchs	Vanderbilt University	Specific learning disabilities, student assessment, mathematics curriculum, psychometric models
Mitchell L. Yell	University of South Carolina	Autism, emotional and behavior disorders, specific learning disabilities, pre-K-12 instruction and curriculum, special education, evidence-based intervention
Sheryl Lazarus	University of Minnesota	Special education policy, inclusion of students with disabilities in assessments, accommodations, alternate assessments, technology-enhanced assessments, large-scale assessments, school accountability, research design (including cost analyses)
Martha Thurlow	University of Minnesota	Specific learning disabilities, reading assessment, alternate student assessment, early childhood education, special education, curriculum, large-scale studies
Diane Pedrotty Bryant	University of Texas, Austin	Educational interventions for improving the mathematics and reading performance of students with learning disabilities, the use of assistive technology for individuals with disabilities, interventions for students with learning disabilities and who are at risk for educational difficulties
Technical Rev	iew Panel (May 10, 2016; I	May 16, 2017)
Grace Kao	University of Pennsylvania	Dr. Kao's research interests center on the explanation of immigrant, racial, and ethnic disparities in education outcomes. Her work has used quantitative analyses of nationally representative data on students and parents (including NCES data sets as well as AddHealth).
Margaret McLaughlin	University of Maryland	Dr. McLaughlin's research focuses on special education policy, particularly use of large-scale data in policy research including investigation of the impact of education reform on students with disabilities and special education programs.
Lisa Jacobson	Kennedy Krieger Institute	Dr. Jacobson specializes in clinical pediatric neuropsychology. Her research interests include cognitive and behavioral aspects of disorders related to attention and executive functions. She is interested in how children's developing executive functions interact with developmental contexts both at home and school.
Brian Rowan	University of Michigan	Dr. Rowan's research has focused on the organization and management of schooling, paying special attention to the measurement and improvement of teaching quality. His current research includes a randomized field trial of an early grades reading intervention, an evaluation of a high school instructional improvement program, and a study of online high schools in Florida.
Oscar Barbarin	University of Maryland	Dr. Barbarin's research has focused on the social and familial determinants of ethnic and gender achievement gaps beginning in early childhood. An additional focus is Dr. Barbarin's concern with socioemotional and academic development, particularly of boys of color.
James P. Byrnes	Temple University	Dr. Byrnes interests include the modeling of academic achievement, decision-making and risk-taking, development of mathematical expertise, gender differences in achievement, and critical thinking about neuroscientific research.

Name	Affiliation	Expertise
Dan Romer	Appenhera Public Policy	Dr. Romer has studied social influences on adolescent health with particular attention to the social transmission of risky behavior. He is currently studying a cohort of adolescents in Philadelphia to understand the risk factors that underlie early use of drugs and other threats to healthy development. His interests include the relationship between risk behavior and Executive Function.
Jeremy Finn	University at Buffalo	Dr. Finn's research interests include school organization and class size, student engagement, disengagement, and dropping out, students at risk, and using quantitative methods to study policy issues.
Lynn Newman	SRI International	Dr. Newman has experience in education and social science research in disability policy and human services. She has expertise in quantitative and qualitative methodologies and large-scale, longitudinal studies, particularly with respect to school experiences and transitions of youth with disabilities.

A.9 Payments or Gifts to Respondents

High levels of school participation are critical to the success of each phase of the study. School administrator, mathematics teacher, special education teacher, parent, and student data collection activities are contingent on school cooperation. NCES recognizes that the burden level of the study is one of the factors that school administrators will consider when deciding whether to participate. To offset the perceived burden of participation, NCES intends to continue to use strategies that have worked successfully in other NCES studies (e.g., ECLS-K, ECLS-K:2011, HS&B, NELS:88, and ELS:2002), including offering both monetary and non-monetary incentives to be given to respondents after they participate in the data collection activities, for example upon completion of a survey. Table 2 summarizes the proposed incentive amount for each instrument and activity along with their estimated administration times. A brief justification for each incentive amount follows table 2. Incentive information is provided for MS1 and OFT2 data collection activities.

Table 2. MS1 and OFT2 Instruments and Incentive Amounts

Instrument/Activity	Administration Time*	MS1 and OFT2** Incentives		
MS1 Data Collection				
Student return of parent consent forms (explicit consent schools only)	10 minutes	Food event at school (e.g., pizza, bagels, etc.) sponsored by the study		
Student Assessments and Survey – Inschool administration (Mathematics, Reading, Executive Function, Height, Weight, & Survey)	90 minutes	Earbuds used during assessment, plus choice of		
Student Assessments and Survey – Out-of-school administration (Mathematics, Reading, & Survey)	55 minutes	\$20		
Parent Survey	\$30 to \$40 for responding parents of with emotional disturbance (one per student) \$20 to \$30 for responding parents of students (one parent per student)			
Mathematics Teacher Teacher Survey	20 minutes	\$20		
Mathematics Teacher Teacher Student Report	10 minutes per student	\$7 per student		
Special Education Teacher Teacher Survey	10 minutes	\$20		
Special Education Teacher Teacher Student Report	25 minutes per student	\$7 per student		

Instrument/Activity	Administration Time*	MS1 and OFT2** Incentives	
School Administrator Survey	40 minutes	No monetary incentive	
School Participation School Coordinator	6 hours for consent assistance 2 hours to schedule assessments 2 hours to coordinate session	\$400 or \$600 in check or material or services for school (Main Study Base Year)	
(logistics, on-site visit, consent forms, administrative records, etc.)	logistics 6 hours to provide administrative records	\$150 for coordinator	
OFT2 Data Collection			
Student return of parent consent forms (explicit consent schools only)	10 minutes	Food event at school (e.g., pizza, bagels, etc.) sponsored by the study	
Student Assessments and Survey (Mathematics, Reading, Executive Function & Survey)		Earbuds used during assessment (no additional	
In-school administration (grade 7 & 8)		token incentive)	
Out-of-school administration (grade 7 only)	75 minutes 75 minutes	\$20	
School Administrator Survey	40 minutes	No monetary incentive	
School Participation	6 hours for consent assistance 2 hours to schedule assessments	\$200 in check or material or services for school	
School Coordinator (logistics, on-site visit, consent forms, administrative records, etc.)	2 hours to coordinate session logistics6 hours to provide administrative records	\$150 for coordinator	
MS2 Data Collection			
Student return of parent consent forms (explicit consent schools only)	10 minutes	Food event at school (e.g., pizza, bagels, etc.) sponsored by the study	
Student Assessments and Survey (Mathematics, Reading, Executive Function, Height, Weight, and Student Survey) In-school administration	90 minutes	Earbuds used during assessment (no additional token incentive)	
	3 3 11111111111111111111111111111111111	·	
Out-of-school administration School Administrator Survey	90 minutes	\$20	
School Participation	40 minutes 6 hours for consent assistance 2 hours to schedule assessments	No monetary incentive \$200 in check or material or services for school	
School Coordinator (logistics, on-site visit, consent forms, administrative records, etc.) *Note that the assessment administration time m	2 hours to coordinate session logistics6 hours to provide administrative records	\$150 for coordinator	

^{*}Note that the assessment administration time may be longer for students with disabilities.

Students

Main Study Base Year (MS1): A choice of up to four token incentive items will be offered to students participating in the Main Study data collection in school. In addition, students will be allowed to keep the earbuds used during the assessment. For students at schools where explicit parental permission is required (i.e., return of parental consent form), students who return the form by a set date will be offered a food event sponsored by the study (e.g., pizza, bagels, etc.).

To increase response rates, schools that cannot permit an in-school session will be offered the option of providing student roster information and having the students participate outside of school. As was approved for OFT2 (OMB# 1850-0911 v.15), students participating in MGLS:2017 MS1 outside of school will be offered \$20 to encourage their participation in the study on their own time.

 $[\]ensuremath{^{**}}$ Final incentive amounts were determined based on the outcome of the field tests.

Operational Field Test Follow-Up (OFT2) and Main Study First Follow-up (MS2): Students in the OFT1 sample who are participating in school for OFT2 (most of whom will be in grade 7) will be allowed to keep the earbuds used during the assessment. Students who have left their Base Year school and are unable to participate in school (e.g., if the number of MGLS:2017 sampled students at the new school in which they are enrolled, meaning the school to which they transferred, is less than 4, see Part B.2 for additional detail) will be invited to participate via web outside of school. These students will not receive earbuds but instead will be offered \$20 for their participation. The out-of-school data collection is planned to minimize sample attrition for the longitudinal study so that students in the base-year sample may still participate regardless of their educational situation in subsequent rounds. These students are critical as they may be different from students who participate in school. The monetary incentive offered to these students is designed to encourage them to incur the burden of participating in the study on their out-of-school time. A \$20 incentive is less than that offered for out-of-school data collection for HSLS (which offered an incentive between \$25 and \$50 in the First Follow-up). We will assess whether this incentive amount is effective to gain participation from students in the middle grades before determining the incentives for MS2. (Additional information is provided in Part B.3).

To calibrate items for the Main Study Second Follow-up in eighth grade, without conducting an additional costly field test, the OFT2 data collection will include about 400 students in grade 8 to test more challenging items on the math and reading assessments than were available in the prior field tests. These students will not be part of the longitudinal sample, will only be eligible to participate in school, and will be allowed to keep their earbuds.

Parents

Parent survey response rates have declined over the past decade. The ECLS-K:2011 baseline (fall 2010) parent survey response rate was more than 10 percentage points lower (74 percent)³ than the parent survey rate in the corresponding 1998 wave of the ECLS-K (85 percent).⁴ Additionally, the ninth-grade parent survey response rate for the HSLS:09 baseline was 68 percent.⁵ The MGLS:2017 parent survey is a key component of the data being collected.

To improve the chances of obtaining higher parent participation rates in a school-based design, we will work with school personnel to recruit sample students' parents for MGLS:2017. In MS1, although we had originally planned to use a responsive design approach to identify cases for nonresponse follow-up interventions, responsive design methods are not practical to implement for Base Year parent data collection as discussed in more detail in Part B.3. Instead, based on the OFT1 results, optimal baseline incentive values and incentive boosts have been determined as well as more intensive efforts for parents of students with Emotional Disturbance (EMN).

Teachers, Schools, and School Coordinators

Table 5 provides information on incentive amounts for teachers, schools, and school coordinators in the Main Study Base Year and the OFT First Follow-up (OFT2). "Schools" refers to all Base Year schools and any new schools with four or more sample members enrolled.

Table 5. Main Study Base Year (MS1) and OFT First Follow-up (OFT2) Teacher, School, and School Coordinator Incentive Levels

Respondent	Main Study Base Year (MS1)	OFT First Follow-up (OFT2)
Teachers	\$20 per teacher survey	Not asked to complete a survey in OFT2
reactions	\$7 per teacher student report	The dished to complete a sarrey in or 12
Schools	\$400-\$600 or	\$200 or
SCHOOIS	\$400-\$600 non-monetary equivalent	\$200 non-monetary equivalent
School Coordinators	\$150	\$150

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³ Tourangeau, K., Nord, C., Lê, T., Sorongon, A.G., Hagedorn, M.C., Daly, P., and Najarian, M. (2012). *Early Childhood Longitudinal Study, Kindergarten Class of 2010–11 (ECLS-K:2011), User's Manual for the ECLS-K:2011 Kindergarten Data File and Electronic Codebook* (NCES 2013-061). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

⁴ Tourangeau, K., Nord, C., Lê, T., Sorongon, A.G., Hagedorn, M.C., Daly, P., and Najarian, M. (2001). *Early Childhood Longitudinal Study, Kindergarten Class of 1998–99 (ECLS-K), User's Manual for the ECLS-K Base Year Public-Use Data Files and Electronic Codebook* (NCES 2001-029). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

⁵ Ingels, S.J., Pratt, D.J., Herget, D.R., Burns, L.J., Dever, J.A., Ottem, R., Rogers, J.E., Jin, Y., and Leinwand, S. (2011). *High School Longitudinal Study of 2009 (HSLS:09)*. *Base Year Data File Documentation* (NCES 2011-328). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

Teachers

Main Study Base Year (MS1): The incentive proposed for students' teachers is \$20 per teacher survey, plus \$7 per teacher student report (TSR). These amounts are consistent with the amounts used in current NCES studies, such as the ECLS-K:2011. For the mathematics teacher, it is estimated that the teacher survey will take 20 minutes to complete, and the teacher student report will take 10 minutes per student to complete. For the special education teacher, it is estimated that the teacher survey will take 10 minutes to complete, and the teacher student report will take 25 minutes per student to complete. The teacher student report is expected to take longer for the special education teacher because it includes an additional indirect assessment of student's skills that is not included in the mathematic teacher's teacher student report. We are proposing to use the same incentive structure for all teachers, regardless of the specific questionnaires they are being asked to complete, to protect against any perception of unfairness that might result if teachers within a school talk to one another about the amount they have received for a specific questionnaire.

OFT First Follow-up (OFT2): Teachers will not be asked to complete a survey in OFT2.

Schools

Main Study Base Year (MS1): A school-level incentive for the Main Study of \$400 or non-monetary equivalent to \$400 in materials or services was approved in April 2017 (1850-0911 v.13) based on the results of the IVFT and OFT. An additional \$200 (for a total of \$600) to schools associated with districts that initially decline to participate and that have one or more schools that are designated as having "higher" counts of students in the focal disability groups was approved in June 2017 (1850-0911 v.15) based on the results of OFT.

OFT First Follow-up (OFT2): OFT2 consists of a shorter student session than in OFT1 and includes an administrator survey but no other staff surveys. However, there is still considerable burden for the school to provide tracking information and to coordinate student sessions. We will offer schools \$200 in cash or cash equivalent to encourage their participation in OFT2.

School Coordinators

Main Study Base Year (MS1) and OFT First Follow-up (OFT2): School coordinators will be offered a \$150 monetary incentive. They play an especially important role in the study and are critical to its success. The coordinator in each participating school will coordinate logistics with the data collection contractor; compile and supply to the data collection contractor a list of eligible students for sampling for the Main Study and enrollment status update information for OFT2; communicate with teachers, students, and parents about the study to encourage their participation; distribute and collect parental consent forms; and assist the test administrator in ensuring that the sampled students attend the testing sessions.

A.10 Assurance of Confidentiality

NCES is authorized to conduct this study by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. \$9543). By law, the data provided by schools, staff, parents, and students may be used only for statistical purposes and may not be disclosed or used in identifiable form for any other purpose except as required by law (20 U.S.C. \$9573 and 6 U.S.C. \$151). The laws pertaining to the collection and use of personally identifiable information will be clearly communicated in correspondence with states, districts, schools, teachers, students, and parents. Letters and informational materials will be sent to parents and school administrators describing the study, its voluntary nature, and the extent to which respondents and their responses will be kept confidential. This information will also be included in any research application required by school districts. A list of sixthgrade students with IEPs will be requested from school districts and/or schools under the FERPA exception to the general consent requirement that permits disclosures to authorized representatives of the Secretary for the purpose of evaluating Federally supported education programs (34 CFR \$\$ 99.31(a)(3)(iii) and 99.35). In turn, for the follow-ups, schools will be asked to confirm the enrollment of student sample members. This information will be securely destroyed when no longer needed for the purposes specified in 34 CFR \$99.35. Both the sixth grade enrollment list and the enrollment update lists will be securely destroyed when no longer needed for the purposes specified in 34 CFR \$99.35.

The confidentiality pledge was updated during the course of OFT, as reflected in the submission documents (Appendices MS1-C through MS1-T, Appendices OFT2-A through OFT2-L, and note for Appendices OFT1-T through OFT1-W) to reflect the addition of the Cybersecurity Enhancement Act of 2015 provision. The revised

pledge reads: "All of the information you provide may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. \$9573 and 6 U.S.C. \$151)." The OFT1 materials and MS1 Endorsement Request Letter and State Letter and Sample Endorsement Letter were not updated because they have already been used, given that OFT1 and MS1 endorsement and state letters became operational prior to the implementation of the revised pledge. All other aspects of MS1 and recruitment for OFT2 now include the revised pledge, as do all materials for MS2 and OFT3.

Data security and confidentiality protection procedures have been put in place for MGLS:2017 to ensure that RTI International and its subcontractors comply with all privacy requirements, including:

- 1. The Statement of Work of this contract (ED-IES-15-0-5016);
- 2. Family Educational and Privacy Act (FERPA) of 1974 (20 U.S.C. §1232(g));
- 3. *Privacy Act of 1974* (5 U.S.C. \$552a);
- 4. Privacy Act Regulations (34 CFR Part 5b);
- 5. Computer Security Act of 1987;
- 6. U.S.A. Patriot Act of 2001 (P.L. 107-56);
- 7. Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. \$9573);
- 8. Confidential Information Protect and Statistical Efficiency Act of 2002;
- 9. E-Government Act of 2002, Title V, Subtitle A;
- 10. Cybersecurity Enhancement Act of 2015 (6 U.S.C. \$151);
- 11. The U.S. Department of Education General Handbook for Information Technology Security General Support Systems and Major Applications Inventory Procedures (March 2005);
- 12. The U.S. Department of Education Incident Handling Procedures (February 2009);
- 13. The U.S. Department of Education, ACS Directive OM: 5-101, Contractor Employee Personnel Security Screenings;
- 14. NCES Statistical Standards; and
- 15. All new legislation that impacts the data collected through the contract for this study.

Furthermore, RTI International will comply with the Department's IT security policy requirements as set forth in the Handbook for Information Assurance Security Policy and related procedures and guidance, as well as IT security requirements in the Federal Information Security Management Act (FISMA), Federal Information Processing Standards (FIPS) publications, Office of Management and Budget (OMB) Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance. All data products and publications will also adhere to the revised NCES Statistical Standards, as described at the website: http://nces.ed.gov/statprog/2012/.

The MGLS:2017 procedures for maintaining confidentiality include notarized nondisclosure affidavits obtained from all personnel who will have access to individual identifiers; personnel training regarding the meaning of confidentiality; controlled and protected access to computer files; built-in safeguards concerning status monitoring and receipt control systems; and a secure, staffed, in-house computing facility. MGLS:2017 follows detailed guidelines for securing sensitive project data, including, but not limited to: physical/environment protections, building access controls, system access controls, system login restrictions, user identification and authorization procedures, encryption, and project file storage/archiving/destruction.

MGLS:2017 will use additional security measures to protect the web Parent Survey from unauthorized access in the form of security questions based on data previously collected on the participants. These questions will take a form commonly associated with credit check "pick lists." A survey entrant will be asked (a) to select their child's name from a list of otherwise fictitious names and (b) to identify their child's school from a list. If they answer correctly, they will move onto the Parent Survey. If their answer does not match the MGLS:2017 record, they will be asked to contact the study for further assistance. The web survey will also be programmed to prevent backtracking to areas of the survey with personally identifiable information (PII). This measure is intended to prevent unauthorized access to PII within in-progress surveys.

NCES has a secure data transfer system, which uses Secure Socket Layer (SSL) technology, allowing the transfer of encrypted data over the Internet. The NCES secure server will be used for all administrative data sources. All

data transfers will be encrypted.

The Department has established a policy regarding the personnel security screening requirements for all contractor employees and their subcontractors. The contractor must comply with these personnel security screening requirements throughout the life of the contract. There are several requirements that the contractor must meet for each employee working on the contract for 30 days or more. Among these requirements are that each person working on the contract must be assigned a position risk level. The risk levels are high, moderate, and low based upon the level of harm that a person in the position can cause to the Department's interests. Each person working on the contract must complete the requirements for a "Contractor Security Screening." Depending on the risk level assigned to each person's position, a follow-up background investigation by the Department will occur.

The Family Educational Rights and Privacy Act (FERPA) (34 CFR Part 99) allows the disclosure of personally identifiable information from students' education records without prior consent for the purposes of MGLS:2017 according to the following excerpts: 34 CFR \$99.31 asks, "Under what conditions is prior consent not required to disclose information?" and explains in 34 CFR \$99.31(a) that "An educational agency or institution may disclose personally identifiable information from an education record of a student without the consent required by \$99.30 if the disclosure meets one or more" of several conditions. These conditions include, at 34 CFR \$99.31(a)(3):

The disclosure is, subject to the requirements of \$99.35, to authorized representatives of-

- (i) The Comptroller General of the United States;
- (ii) The Attorney General of the United States;
- (iii) The Secretary; or
- (iv) State and local educational authorities.

MGLS:2017 is collecting data under the Secretary's authority. Specifically, NCES, as an authorized representative of the Secretary of Education, is collecting this information for the purpose of evaluating a federally supported education program. Any personally identifiable information is collected with adherence to the security protocol detailed in 34 CFR \$99.35:

- (a)(1) Authorized representatives of the officials or agencies headed by officials listed in \$99.31(a)(3) may have access to education records in connection with an audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs.
 - (2) The State or local educational authority or agency headed by an official listed in \$99.31(a)(3) is responsible for using reasonable methods to ensure to the greatest extent practicable that any entity or individual designated as its authorized representative—
 - (i) Uses personally identifiable information only to carry out an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements related to these programs;
 - (ii) Protects the personally identifiable information from further disclosures or other uses, except as authorized in paragraph (b)(1) of this section; and
 - (iii) Destroys the personally identifiable information in accordance with the requirements of paragraphs (b) and (c) of this section.
- (b) Information that is collected under paragraph (a) of this section must—
 - (1) Be protected in a manner that does not permit personal identification of individuals by anyone other than the State or local educational authority or agency headed by an official listed in \$99.31(a)(3) and their authorized representatives, except that the State or local educational authority or agency headed by an official listed in \$99.31(a)(3) may make further disclosures of personally identifiable information from education records on behalf of the educational agency or institution in accordance with the requirements of \$99.33(b); and
 - (2) Be destroyed when no longer needed for the purposes listed in paragraph (a) of this section.

- (c) Paragraph (b) of this section does not apply if:
 - (1) The parent or eligible student has given written consent for the disclosure under \$99.30; or
 - (2) The collection of personally identifiable information is specifically authorized by Federal law.

Additionally, the study qualifies for a 45 CFR Part 46 waiver of consent based on the following factors:

There is minimal risk to the participants. There is no physical risk and only minimal risk associated with linkage of data to sample members. Data will undergo disclosure avoidance analysis and disclosure treatment steps to further reduce the risk.

The waiver will not affect the rights and welfare of the subjects. The voluntary nature of the study is emphasized to sample members. Public-use and restricted-use data are only used for research purposes and lack direct individually-identifying information. The data are further protected through disclosure avoidance procedures approved by the NCES Disclosure Review Board.

Whenever appropriate, subjects will be provided with additional pertinent information after they have participated. For each round of the study, information about prior rounds and the nature of the study is made available to sample members.

The study cannot be conducted practicably without the waiver. To obtain written consent from sample members, multiple forms would have to be sent to the sample members with multiple follow-up telephone and in-person visits. This process would add weeks to the data collection process and is not feasible from a time standpoint. Additionally, the value of these data would be jeopardized from a nonresponse bias perspective.

The potential knowledge from the study is important enough to justify the waiver. MGLS:2017 will provide invaluable data to researchers and education policy makers about the progress and experiences of middle-grade students, when there is currently no other comprehensive data source regarding this population.

A.11 Sensitive Questions

MGLS:2017 is a voluntary study, and no persons are required to respond to the questionnaires or to participate in the assessments. In addition, respondents may decline to answer any question they are asked. This voluntary aspect of the survey is clearly stated in the advance letter mailed to adult respondents, other study materials such as the Frequently Asked Questions, and the instructions on web and hardcopy questionnaires. It is also stressed by field staff and telephone interviewers in any question they ask. This voluntary aspect of the survey is clearly stated in the training to ensure that all data collection staff are both communicating the voluntary aspect to participants and following the guidelines. Additionally, students may refuse to participate during the assessments and study field staff are trained to respect students' wishes. The following describes the topics for each instrument that may be sensitive for some respondents.

Schools. In MS1, a roster of all students in grade 6 will be requested from each school or its school district, including the collection of IEP and disability information. In the OFT2, the OFT1 schools will be asked to verify the enrollment status of each student sampled for OFT1 and provide new school information for those no longer enrolled (see Part B.2 and Appendices OFT2-C and OFT2-D). The same procedure will be used in the OFT3 with the OFT2 schools (OFT3-A and OFT3-B). Similar procedures will be proposed for MS2 in the October 2018 submission (OMB# 1850-0911 v.21). Schools may have concerns about providing this information without first obtaining permission from the parents to do so. The disclosure is permitted under FERPA's exception to the general consent requirement that permits disclosures to authorized representatives of the Secretary for purposes of evaluating Federally supported education programs (34 CFR \$\$ 99.31(a)(3)(iii) and 99.35). This information will be securely destroyed when no longer needed for the purposes specified in 34 CFR \$99.35. All district and school personnel facilitating the conduct of the study and developing the sampling frame will be informed of the privacy and confidentiality protocols required for the study, including those having to do with the sample lists of schools and students.

School Administrator. The items in the School Administrator Questionnaire are not of a sensitive nature and should not pose sensitivity concerns to respondents.

⁶ The collection of these data in MS1 is necessary to facilitate the oversampling of students in two of the three focal disability groups: autism and emotional disturbance. Schools that opt not to provide IEP and disability information may still participate and disability information will be requested as part of the parent and teacher surveys.

Math Teacher. The information collected in the teacher student report could be regarded as sensitive because the teacher is asked to provide information about a student's academic skills, social skills (including classroom behavior and peer relationships), problem behavior (including anger, manipulation, and disobedience), and experience with peer victimization, both as a victim and as an aggressor.

Special Education Teacher. As with the math teacher survey, information collected in the teacher student report may be regarded as sensitive. Each special education teacher is asked to provide information on a student's special education status, IEP goals, and services received. The survey also includes questions on the teacher's expectations for the student, and the student's academic and life skills.

Parent. To achieve the study's primary goal of describing the development, academic outcomes, and characteristics of middle grades students, we will be asking parents some questions that could be viewed as sensitive in nature by some respondents. Questions about family income, disciplinary practices, neighborhood safety, their child's disabilities, and problems their child may be having at school, including experience with peer victimization, are included in the parent survey. Additionally, parents are asked if their child ever: got involved with the wrong kinds of people; used drugs or alcohol; got in trouble with the police; beat up others; were beaten up by others; and ran away.

The types of questions included in the staff and parent surveys have been asked in many large-scale studies of school-age children including the ECLS-K, ECLS-K:2011, and HSLS:09. These questions are central to describing the middle grades population and to examining the variability in students' development, mathematics and reading achievement, and other student outcomes.

Student. The student questionnaire includes a few questions that could be sensitive for some students. Questions about internalizing attitudes or behaviors, perceptions of competencies in mathematics, and school and class attendance are included in this self-report survey. Students are asked about negative behaviors of their peers, about being pressured to engage in negative behaviors, and about their relationship with their parents. Students are also asked to self-report their race/ethnicity and sex, which could be sensitive questions for students at this age. The questions that are included in the student survey have been asked in other studies of adolescents and the responses to these questions have been found to help explain why some students do better than others in school and are more engaged in learning.

The in-school session for MS1 and MS2 will also include a height/weight measurement of participating students. Care will be taken to ensure the privacy of this information, and as with all components of the study, participation in the height/weight measurement is voluntary.

A.12 Estimates of Burden

Burden estimates for all activities associated with MS1 and OFT2 and tracking and recruitment activities for MS2 are shown in this section.

<u>Main Study:</u> The <u>MS1 Recruitment</u> portion of table 6 shows the expected burden for districts, schools, and parents during MS1 recruitment activities. We anticipate collecting data within 900 schools for MS1. As described in Part B, we expect overall school participation of 60 percent, and thus the school sampling process will include a reserve sample. Assuming a 60 percent school participation rate, we will need to contact approximately 1,500 schools to get to a yield of 900.

The student sampling process is designed to achieve approximately 20,322 grade 6 participants (Part B, Table 4). To obtain 20,322 participants, we plan to sample approximately 26,100 students (Part B, Table 4).

At the district level, we estimate that it will take 20 minutes on average for district personnel to review the materials and either agree or decline to participate, including debriefing on reasons why schools or districts chose to participate or not to participate in MS1. For those districts participating, we estimate an additional 4 hours for the provision of student rosters, including information about students for sampling, contact information for their parents, and their math and special education teachers (see Appendices MS1-S and MS1-T). The total response burden estimate for district IRB approvals (in the special handling districts that require completion of a research application before they will allow schools under their jurisdiction to participate in a study) is based on an estimated 120 minutes for IRB staff approval and 120 minutes per panelist for approval by the district's IRB panel, which is estimated to average 5 panelists.

At the school level, we also estimate that it will take 20 minutes on average for school administrators to review the materials and either agree or decline to participate, and we estimate an additional 4 hours for schools that decide to participate.

For students' parents, we estimate that it will take up to 10 minutes to review the recruitment materials and either consent or refuse to participate (on behalf of their student and themselves). The provision of student rosters and the parents' consent forms will serve as sources for parents' contact information, which during the data collection period can be used for nonresponse follow-up.

<u>MS1 Data Collection</u> portion of table 6 shows the expected burden for the MS1 data collection. The burden time estimates are based on the maximum reasonable expected burden per respondent:

- The in-school student session, which includes the survey and student assessments, will be approximately 90 minutes, 20 of which will be for the student survey portion. The out-of-school student session, which will include the survey and a subset of the assessments, will take approximately 55 minutes, 20 of which will be for the student survey portion.
- The parent survey will take approximately 40 minutes and will be offered in both English and Spanish.
- The mathematics teacher will complete a teacher survey that includes three levels of information: teacher level, class level, and student level. The teacher-level and class-level questions are expected to take on average approximately 20 minutes to complete. The teacher will be asked to complete a teacher student record for each sampled student in their class, which is expected to take approximately 10 minutes per student to complete. The teacher-level survey burden estimates (including class-level information) assume on average 4 sixth-grade math teachers per school (with an average of approximately 8 students per teacher). With an estimated 900 schools in MS1, this means approximately 3,600 mathematics teachers.
- The special education teacher/service-provider will complete a teacher survey that includes two levels of information: teacher level and student level. The teacher-level portion is expected to take approximately 10 minutes to complete. The special education teacher/service-provider will also be asked to complete a teacher student record for each sampled student in their class, which is expected to take approximately 25 minutes per student to complete. The special education teacher-level survey burden estimates assume on average 2.25 special education teachers per school (with an average of roughly 5 students per teacher). With an estimated 900 schools in MS1, this means approximately 2,025 special education teachers.
- The school administrator survey will take approximately 40 minutes to complete.
- The school coordinator will spend, on average, up to 4 hours per day, per assessment day, supporting study activities. The burden estimates assume one assessment day.

The MS2 Tracking/Recruitment portion of table 6 shows the expected burden for MS2 enrollment status and tracking activities. The estimates of response burden for these proposed activities are based on tracking experiences in HSLS:09. As discussed in Part B, we anticipate contacting —

- All of the (approximately 900) MS1 participating schools.
- The parents of the MS1 eligible students (estimated 25,317, which assumes 97 percent eligibility among the 26,100 sampled, table B.4).
- An estimated 450 schools to which students have moved ("mover schools") for enrollment status update activities.

We estimate that it will take 20 minutes on average for school staff to provide enrollment status of sampled students, and 5 minutes on average for parents to provide updated contact information. We project that approximately 95 percent of schools will provide enrollment status, and 20 percent of parents will provide updated contact information.

<u>Operational Field Test First Follow-up (OFT2):</u> The <u>OFT2 Tracking/Recruitment</u> portion of table 6 shows the expected burden for the OFT2 enrollment status and tracking/recruitment activities. The estimates of response burden for these proposed activities are based on tracking experiences in HSLS:09. As discussed in Part B, we anticipate contacting –

- All of the 45 OFT1 participating schools.
- The parents of approximately 1,120 of the OFT1 participating students (1,294 students participated in OFT1

but for cost reasons some will not be followed; thus a subset of the OFT1 participating students that move to new schools will be included in OFT2.)

• An estimated 30 schools to which students have moved ("mover schools") for OFT2 enrollment status update activities.

We estimate that it will take 20 minutes on average for school staff to provide enrollment status of sampled students and 5 minutes on average for parents to provide updated contact information. We project that approximately 95 percent of schools will provide enrollment status and 20 percent of parents will provide updated contact information.

The <u>OFT2 Data Collection</u> portion of table 6 shows the expected burden for the OFT2 data collection. The burden time estimates are based on the maximum reasonable expected burden per respondent:

- The student session, which includes student assessments and a brief survey for students in both grades 7 and 8, will be approximately 75 minutes. Within the 75 minutes, the student survey portion will take approximately 5 minutes.
- The school administrator survey will take approximately 40 minutes to complete.
- The school coordinator will spend, on average, up to 4 hours per day, per assessment day, supporting study activities. The burden estimates assume one assessment day.

<u>Operational Field Test Second Follow-up (OFT3):</u> The <u>OFT3 Tracking</u> portion of table 6 shows the expected burden for the OFT3 tracking activities. We estimate that it will take 20 minutes on average for school staff to provide enrollment status of sampled students, and 5 minutes on average for parents to provide updated contact information. We project that approximately 95 percent of schools will provide enrollment status, and 20 percent of parents will provide updated contact information. The purpose of the OFT3 is to test tracking procedures. No other data collection will be conducted.

Table 6. MS1, MS2, OFT2, and OFT3 Burden Estimates¹

MGLS:2017 Activity	Sample Size	Expected Response Rate	Number of Respondents	Number of Response s	Median Burden Time (minutes)	Total Burden (hours)	Estimated Respondent Average Hourly Wage ¹	Estimated Respondent Burden Time Cost
MS1 Recruitment								
Nonparticipating districts	1,050	30%	315	315	20	105	\$45.86	\$4,815
Participating districts	1,050	70%	735	735	260	3,185	\$45.86	\$146,064
District IRB staff study approval	263	100%	263	263	120	526	\$45.86	\$24,122
District IRB panel study approval	1,315	100%	1,315	1,315	120	2,630	\$45.86	\$120,612
Nonparticipating eligible schools	1,500	40%	600	600	20	200	\$45.86	\$9,172
Participating schools	1,500	60%	900	900	260	3,900	\$45.86	\$178,854
Students' parents	26,100	95%	24,795	24,795	10	4,133	\$23.86	\$98,613
Total for MS1 Recruitment ²	-	-	28,923	28,923	-	14,679	-	\$582,252
MS1 Data Collection								
Students and Parents								
Student Survey	26,100	85%	22,185	22,185	20	7,395	\$7.25	\$53,614
Student Assessment (in-school) ³	25,520	85%	21,692	21,692	70	25,307	_	_
Student Assessment (out-of- school) ³	580	85%	493	493	35	288	-	_
Students' parents	26,100 ⁴	85%	22,185*	22,185	40	14,790	\$23.86	\$352,889
Students' mathematics teacher	,	•						
Teacher survey	3,600	85%	3,060	3,060	20	1,020	\$28.75	\$29,325
Teacher student report	26,100	85%	3,060*	22,185 ⁵	10	3,698	\$28.75	\$106,318
Students' special education teache	r							
Teacher survey	2,025	85%	1,721	1,721	10	287	\$29.76	\$8,541
Teacher student report	9,460*	85%	1,721*	8,041 ⁶	25	3,350	\$29.76	\$99,696
School administrators and coordinators								
Students' school administrators	900	95%	855	855	40	570	\$45.86	\$26,140
School coordinator	900	100%	900	900	720	10,800	\$27.70	\$299,160
School administrators at non- participating schools	600	60%	360	360	20	120	\$45.86	\$5,503

MGLS:2017 Activity	Sample Size	Expected Response Rate	Number of Respondents	Number of Response s	Median Burden Time (minutes)	Total Burden (hours)	Estimated Respondent Average Hourly Wage ¹	Estimated Respondent Burden Time Cost
MS2 Tracking/Recruitment	MS2 Tracking/Recruitment							
Tracking/Recruitment: Enrollment	Status Up	date						
Base Year districts	735	100%	735*	735	30	368	\$45.86	\$16,876
Mover districts	368	100%	368	368	120	736	\$45.86	\$33,753
District IRB staff study approval	132	100%	132	132	120	264	\$45.86	\$12,107
District IRB panel study approval	660	100%	660	660	120	1,320	\$45.86	\$60,535
School staff at Base Year schools	900	95%	855*	855	20	285	\$45.86	\$13,070
School staff at mover schools	450 ⁷	95%	428	428	20	143	\$45.86	\$6,558
Tracking: Locating Update								
Parents ⁴	25,317 ⁴	20%	5,063*	5,063	5	422	\$23.86	\$10,069
MS1 & Tracking/Recruitment for MS2 Total	-	-	59,592	118,656	-	60,247	-	\$1,716,406
OFT2 Tracking/Recruitment		•						
Tracking: Enrollment Status Updat	e							
School staff at OFT1 schools	45	95%	43	43	20	14	\$45.86	\$642
School staff at mover schools	30 ⁷	95%	29	29	20	10	\$45.86	\$459
Tracking: Locating Update								
Parents	1,120	20%	224	224	5	19	\$23.86	\$453
Total for OFT2 Tracking ²	-	-	296	296	-	43	-	\$ 1,554
OFT2 Data Collection	•	•						
Students (Grade 7)								
Student Survey	1,120	64%	717	717	5	60	\$7.25	\$435
Student Assessment ³	1,120	64%	717	717	70	837	7 -	-
Students (Grade 8)							•	
Student Survey	625	64%	400	400	5	33	\$7.25	\$239
Student Assessment ³	625	64%	400	400	70	467	7 -	-
School administrators and coordin	ators						•	
Students' school administrators	72	80%	58	58	40	39	\$45.86	\$1,789
School coordinator	72	100%	72	72	720	864	\$27.70	\$23,933
OFT2 Total	-	-	1,543	1,543	-	1,039	-	\$27,950
OFT3 Tracking: Enrollment Status	Jpdate							
School staff at OFT2	45	95%	43	43	20	14	\$45.86	\$ 642
School staff at mover schools	44	95%	42	42	20	14	\$45.86	\$ 642
Tracking: Locating Update								
Parents	1,500	20%	300	300	5	25	\$23.86	\$ 597
OFT3 Total	-	-	385	385	-	53	-	\$ 1,881
MS 2 School Notification								
Participating districts	400 ⁸	100%	400	400	10	67	\$45.86	\$3,073
Participating schools	570	100%	570	570	10	95	\$45.86	\$4,357
MS2 Total	-	-	970	970	-	162	-	\$7,430
Total Requested	-	-	62,190	121,554	-	61,501	-	\$1,753,667

¹ The average hourly earnings of parents derived from May 2016 Bureau of Labor Statistics (BLS) Occupation Employment Statistics is \$23.86, of middle school teachers is \$28.75, of middle school special education teachers is \$29.76, of education administrators is \$45.86, and of educational guidance counselors is \$27.70. If mean hourly wage was not provided, it was computed assuming 2,080 hours per year. The exception is the student wage, which is based on the federal minimum wage. Source: BLS Occupation Employment Statistics, http://data.bls.gov/oes/ datatype: Occupation codes: All employees (00-0000); Middle school teachers (25-2022); Middle school special education teachers (25-2053); Education Administrators (11-9032); and Educational guidance counselors (21-1012); accessed on July 6, 2017.

² Recruitment activities for the MS1 and OFT2 tracking activities were not completed at the time this request was initially approved, and thus the approved burden affiliated with the MS1 recruitment and OFT2 tracking is being carried over and is included in the total requested in this submission.

³ Burden associated with student assessments is shown here for informational purposes. It is not included in the total burden calculations because, unlike the other burden presented here, it is not subject to the Paperwork Reduction Act (PRA).

⁴ The number of parent respondents is already included in the recruitment number of respondents. The number of parents included in the MS2 locating update is based on an estimated 97 percent Base Year student-eligibility rate.

⁵ Teachers will be asked to complete student-level reports regardless of the students' participation, so this estimate accounts for 85% of the sampled

⁶ The number of student-level reports estimates approximately 10.5 students with IEPs per school.

⁷ This estimate includes schools that students left after grade 6 because the schools end in grade 6, and other schools from which students moved since their participation in MGLS 2017 Base Year (when they were in grade 6).

⁸ This is a conservative estimate of district count; actual number may be slightly less, subject to further analysis.

^{*} The same respondent group as above, not double counted in the total number of respondents.

A.13 Total Annual Cost Burden

There are no respondent costs other than the cost associated with response time burden.

A.14 Annualized Cost to Federal Government

As shown in table 7, the estimated cost to the federal government for contractor and subcontractor work to conduct all aspects of MS1, OFT2, OFT3 Tracking, and MS2 tracking and recruitment is \$13,371,989. These figures include costs for planning, instrument development, recruitment, data collection, data analysis, and reporting. The total cost for the activities requested in this submission is \$11,753,041 (not including the previously approved MS1 Sampling and Recruitment and OFT2 Tracking and Recruitment).

Table 7. Contract Costs for OFT2 and MS1, and for Tracking and Recruitment for MS21

Main Study Base Year (MS1)	\$ 10,865,667
Main Study Base Year – Sampling and Recruitment	\$ 1,302,292
Main Study Base Year - Other Costs (Data Collection, Reporting)	\$ 9,563,375
Main Study First Follow-up – Tracking and Recruitment (MS2)	\$397,437
Main Study First Follow-up Notification	\$30,000
Operational Field Test First Follow-up (OFT2)	\$ 1,978,885
Operational Field Test First Follow-up – Tracking and Recruitment	316,656
Operational Field Test First Follow-up – Other Costs (Data Collection, Reporting)	\$1,662,229
Operational Field Test Second Follow-up – Tracking	100,000
Total	\$ 13,371,989

¹ Contract costs include 2/5 of cost of management task in MS1; and 1/5 of cost of management task for OFT2 and MS2.

A.15 Program Changes or Adjustments

The increase in burden from the last approved package is due to the fact that the total burden requested in this submission is a sum of burden estimates for MS1 recruitment, MS1 data collection, MS2 tracking/recruitment, OFT2 tracking/recruitment, and OFT2 data collection, while the last approved burden was for OFT1 recruitment, OFT1 data collection, OFT2 tracking, and MS1 recruitment only. The August 2018 update to this submission further increases the total burden time by 215 hours due to the addition of MS2 district and school notification and OFT3 tracking.

A.16 Plans for Tabulation and Publication

The results from OFT2 will be presented in a field test report that will be prepared approximately 6 months after the completion of the field test and subsequently made available in 2019 as an appendix in the MGLS:2017 methodology report. The field test report will include an overview of the study, purposes of the IVFT and OFT1, sample design and methodologies employed, recruitment and data collection results, and recommendations for MS1. The MGLS:2017 methodology report will provide a description of the study design, sample design, training and data collection approaches, and data collection results. The MGLS:2017 psychometric report will provide a detailed accounting of the design and framework for all of the assessments, the item development process and results, and analyses related to the assessment implementation and results. The MGLS:2017 descriptive report will provide a limited set of statistical analyses. All MGLS:2017 results from the national data collections and all reports related to field tests and national data collections will be made available on the NCES website. A schedule for OFT1, MS1, OFT2, and MS2 is provided in table 8.

Table 8. Schedule for OFT1, MS1, OFT2, OFT3, and MS2

Activity	Start date	End date
OFT1 recruitment of schools and districts	April 2016	March 2017
OFT1 recruitment of students and parents through requesting parent consent	January 2017	May 2017
OFT1 Data Collection	January 2017	May 2017
OFT1 & IVFT Report	June 2017	December 2017
MS1 recruitment of schools and districts	February 2017	April 2018
MS1 recruitment of students and parents through requesting parent consent	January 2018	May 2018
MS1 Data Collection	January 2018	July 2018

Activity	Start date	End date
OFT2 tracking and recruitment	August 2017	May 2018
OFT2 Data Collection	January 2018	May 2018
OFT3 tracking and recruitment	September 2018	May 2019
MS2 District and School Notification	September 2018	November 2018
MS2 tracking	September 2018	May 2020
MS2 recruitment	January 2019	May 2020
MS2 Data Collection	January 2020	July 2020

A.17 Display OMB Expiration Date

The OMB expiration date will be displayed on all materials.

A.18 Exceptions to Certification Statement

No exceptions to the certification statement are requested or required.