SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
Accreditation Requirements in 668.43

1. **Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

On April 23, 2025, President Trump issued Executive Order (EO) 14279, titled *Reforming Accreditation to Strengthen Higher Education*. The EO directs the Secretary to take several actions related to the recognition of accrediting agencies or associations by the Department. Some of these actions require changes to existing regulations.

Negotiated Rulemaking was held by the Department, the Accreditation, Innovation, and Modernization (AIM) Committee, on April 13-17, 2026, and May 18-22, 2026. Negotiators consisted of representatives for significantly affected parties. Consensus was reached.

To comply with the EO, the Department proposes amending §668.43 by revising certain credit transfer requirements institutions must comply with. Burden for section 668 is covered under 1845-0022 and therefore a revision to that collection is required.

Currently, 1845-0022 is in the process of being revised based on separate rulemaking. On July 1, 2026, the Department published a Final Rule titled Accountability in Higher Education and Access Through Demand-Driven Workforce Pell: Student Tuition and Transparency System (STATS) and Earnings Accountability (91 FR 40136) revising 34 CFR Part 668. Specifically, amendments were made to new requirements under §668.43: institutional and programmatic information.

Due to the timing of the accountability regulatory package and the EO, the Department is requesting approval of a *new* collection to track the requirements and burden of §668.43 during the rulemaking processes. Once all regulations are final and all collections are approved by OMB, the Department will merge 1845-NEW with 1845-0022 Student Assistance General Provisions. This allows the burden for §668.43 to stay within one information collection without compromising the public's review of any proposed rules in the interim.

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

This information will be used to inform prospective students of the institution's credit transfer policies and more specifically how many transfer credits the institution will accept for the specific student and the reasons why if transfer credits are not accepted. We propose that the student will receive extensive information about the institution's transfer of credit policies as long as the student submits his or her transcript to the institution prior to the student making a nonrefundable financial commitment, enrollment, or registration.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g. using an electronic form, system or website from paper), please explain in number 12.**

   There are no prohibitions when it comes to the use of technology in this collection.

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

   No other collections exist that contain the requirements of this regulation for institutions. A student who receives the disclosures with the transcript deadline may have already, at one point or another, submitted their transcript to their institution. In this situation, a student would not be required to submit their transcript again in order for an institution to consider transfer credit so long as the institution has what it needs prior to the date they prescribe. The regulations would not require a second submission specifically for transfer credit consideration.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.**

   This collection does not impact small businesses.

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

   The Department would not be able to provide the public with a complete Notice of Proposed Rulemaking for the expanded accrediting requirements without including an ICR reflecting burden changes for all proposed regulations. §668.43 is currently being updated with the Accountability Final Rule. Without this temporary collection the public would not be able to comment on burden for all proposed regulations.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

   - **requiring respondents to report information to the agency more often than quarterly;**
   - **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
   - **requiring respondents to submit more than an original and two copies of any document;**
   - **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
   - **in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**
   - **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
   - **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
   - **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

   None of the special circumstances listed apply to this collection.

8. **As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.**

   Include a citation for the 60 day comment period (e.g. Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60 day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30 day notice, indicate that a notice will be published.
Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The Department developed proposed regulations after conducting Negotiated Rulemaking sessions with affected entities. These sessions took place April 13-17, 2026, and May 18-22, 2026. Consensus was reached. The comment period for this new collection 1845-0193 Accreditation Requirements in §668.43 ran concurrently with the Notice of Proposed Rulemaking (91 FR 53940). Comments received related to the Paperwork Reduction Act were addressed in the Final Rule (91 FR 68626).

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

No payments or gifts will be provided to respondents.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.[1] If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.**

The Department makes no assurances of confidentiality with this collection.

[1] Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature in this collection.

12. Provide estimates of the hour burden for this current information collection request. The statement should:

- **Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- **Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**
- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. Use this site to research the appropriate wage rate. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

§ 668.43 Institutional and Programmatic Information Requirements

The final rule in § 668.43(a)(11) will add an additional requirement to the information that institutions participating in the Federal student aid programs are required to provide to enrolled and prospective students. Specifically, the final rule will add an additional student consumer disclosure that requires institutions to inform students and prospective students of the timeline by which a transcript must be submitted for timely review for transfer of credit. This timeline must conclude prior to the student's enrollment, registration, or making a nonrefundable financial

commitment, so that a prospective student will know how many credits that they have earned at other institutions will transfer to a new institution before he or she incurs cost and time at that institution.

Before the final rule, institutions were only required under this section to provide a description of the transfer of credit policies established by the institution, including a statement of the institution's current transfer of credit policies that included: any established criteria the institution uses regarding the transfer of credit earned at another institution and any types of institutions or sources from which the institution will not accept credits; a list of institutions with which the institution has established an articulation agreement; and written criteria used to evaluate and award credit for prior learning experience including, but not limited to, service in the armed forces, paid or unpaid employment, or other demonstrated competency or learning.

The final rule in § 668.43(c) will also require that if an institution declines to award credit under its transfer of credit policy, the institution must provide a written rationale to the student as to why the transfer credit was not accepted and provide information on each course that did not result in transfer credit.

Burden Calculation
The final rule in § 668.43(a)(11) will require institutions to update their transfer of credit disclosure to include a timeline for submission of transcripts that meets the requirements of the new regulations. The Department notes that all institutions already have policies and procedures for submission of transcripts under their current transfer of credit policy. However, while this is not a new requirement, the Department acknowledges that some institutions may need to revise their timelines to comply with the new requirements. In calculating administrative burden with the new requirements, the Department assumes institutions will continue their current practices to receive transcripts and send their required disclosures and communications to students electronically.

In the NPRM, the Department estimated that this new requirement would take approximately 470 hours per institution to initially implement. After reviewing its prior analysis in response to the comments, the Department found that its analysis in the NPRM included burden associated with complying with existing requirements in addition to the new requirements in the final rule.

The Department has revised its estimates, as explained below.

Institutions will be required to review the requirements and scope of the new regulations (5 hours), identify the scope of the new requirements (10 hours), and amend policies and procedures (25 hours). The Department estimates that this will take approximately 40 hours per institution one time.

The Department also reassessed its estimates for student reporting burden from its estimate in the NPRM. The analysis in the NPRM improperly identified the regulation as a new reporting requirement. Students seeking transfer of credits already submit transcripts from other institutions to new institutions and the new regulations do not change this practice or impose a new requirement on students. In fact, the new regulations will likely benefit students by ensuring

that they do not unwittingly enroll at a new institution under the false presumption that the credits they earned at other institutions will be accepted toward a certificate or degree at that institution.

Estimated Annual Burden and Respondent Costs Table

For institutions, we used the median hourly wage for Education Administrators, Postsecondary (11-9033) from the U.S. Bureau of Labor Statistics. In 2025 this was $50.29. To account for overhead costs and benefits, the Department has multiplied by this wage by two, resulting in hourly costs of $100.58.

Entity	Responses	Hours	Burden Hours	Hourly Wage	Costs
Public	1,806	40	72,240	$100.58	$7,265,899
Private	1,649	40	65,960	$100.58	$6,634,256
For Profit	1,546	40	61,840	$100.58	$6,219,867
Total	**5,001**	**40**	**200,040**		**$20,120,023**

Please ensure the annual total burden, respondents and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.**

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact**

analysis associated with the rulemaking containing the information collection, as appropriate.

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12.**

Total Annualized Capital/Startup Cost :
Total Annual Costs (O&M) :
Total Annualized Costs Requested :

There are no annual/capital startup costs to respondents.

14. **Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

There are no additional costs to the Federal government as a result of the regulations.

15. **Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).**

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden			**+200,040**
Total Responses			**+5,001**

Total Costs (if applicable)			

The Department is requesting 200,040 burden hours and 5,001 responses for *1845-0193 Accreditation Requirements in §668.43*. This is a temporary collection to assess burden for §668.43 as it applies to this rulemaking (1840-AE06). Once the regulations are final and all collections have been approved, 1845-0193 will be transferred back to OMB control number 1845-0022 Student Assistance General Provisions which is the appropriate collection for regulations under 34 CFR Part 668 Subpart D.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The results of this information collection will not be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Department is not seeking this approval.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

The Department is not requesting any exceptions to the Certification of Paperwork Reduction Act.