

2004/09 Beginning Postsecondary Students
Longitudinal Study (BPS:04/09)
Undergraduate Transcript Collection

Supporting Statement
Request for OMB Review (SF83i)

Submitted by
National Center for Education Statistics
U.S. Department of Education
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Preface

This document has been prepared to support the clearance of study procedures for a transcript collection, under the *Paperwork Reduction Act of 1995* and *5 CFR 1320*, for the *2004/09 Beginning Postsecondary Students Longitudinal Study (BPS:04/09)*. BPS:04/09 is being conducted through the exercise of Option 2 of the 2004 National Study of Faculty and Students (NSOFAS:04) for the U.S. Department of Education's National Center for Education Statistics (NCES) by RTI International¹(RTI), with its subcontractor MPR Associates, Inc. (MPR), under contract number ED-02-CO-0011.

This submission requests revision of the previously obtained clearance for the 2004/09 Beginning Postsecondary Students Longitudinal Study, (BPS:04/09; OMB No. 1850-0631) to conduct a collection of undergraduate transcripts from all institutions attended by the full-scale study sample. This work is in addition to the work described in the currently approved submission. This package describes procedures planned for the collection.

The base year for the BPS:04/09 longitudinal study was conducted as part of the 2004 *National Postsecondary Student Aid Study (NPSAS:04)* in which sample members were identified for membership in the BPS:04 longitudinal cohort. The first follow-up interview with the cohort, BPS:04/06, was conducted in 2005 (field test) and 2006 (full-scale). Data collection for the second follow-up, BPS:04/09, will be conducted in 2008 (field test) and 2009 (full-scale). The transcript collection will only be conducted for the full-scale sample. It will be the first time any such collection has been done for a BPS cohort, but a similar transcript collection has been approved for the 2008/09 Baccalaureate and Beyond Longitudinal Study (B&B:08/09) cohort, as well as for previous high school cohort studies when the sample has completed postsecondary education.

Subsequent sections of this document respond to the Office of Management and Budget (OMB) instructions for preparing supporting statements to Standard Form (SF) 83-I, as follows:

- Section A Justification (Part A)
- Section B Collection of Information Employing Statistical Methods (Part B)
- Section C Overview of Analysis Topics and Survey Items

Additional documentation is provided in the accompanying appendices:

- Appendix A Bibliography for the Beginning Postsecondary Students Longitudinal Study
- Appendix B Technical Review Panel
- Appendix C Confidentiality Agreements

¹ RTI International is a trade name for Research Triangle Institute.

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A. Justification

1. Circumstances Making Collection of Information Necessary

a. Purpose of this Submission

The Beginning Postsecondary Students (BPS) longitudinal study series represents a departure from previous longitudinal studies of college-age cohorts in that it starts with a cohort of individuals beginning their postsecondary studies, regardless of when they completed high school. Consequently, information will be available from BPS about *nontraditional* postsecondary students who have delayed continuation of their education after high school because of military service, family responsibilities, or other reasons. Nontraditional students continue to represent a growing segment of the postsecondary student population.

The BPS study series also makes it possible to trace the paths of first-time beginning (FTB) students throughout the entire system of postsecondary education over a number of years, capturing transfers, coenrollment, and periods of nonenrollment (stopouts). Unlike the typical retention and attainment studies of entering freshmen at a single institution, BPS allows for the study of student persistence and attainment anywhere. About one-half of all beginning students attend more than one institution in the 6 years after they began their postsecondary education, so the information about student progress and degree completion available from a single institution provides an incomplete picture of the student experience.

BPS is one of several studies sponsored by the U.S. Department of Education to respond to the need for a national, comprehensive database concerning significant issues in access, choice, enrollment, persistence, progress, and attainment in undergraduate postsecondary education, in graduate and professional school access, and in consequent rates of return to society. The base for this information system is the National Postsecondary Student Aid Study (NPSAS), a recurring survey of a nationally representative, cross-sectional sample of postsecondary students. The NPSAS surveys have been implemented every 3 or 4 years since 1986–87.

First-time beginning students are identified as part of the NPSAS and are then followed from initial entry into postsecondary education through completion of their education and entry into the workforce. NPSAS:90 was the base year for the first BPS study, which included two follow-up interviews over 5 academic years (BPS:90/92 and BPS:90/94). NPSAS:96 was the base year for the second BPS study, which included two follow-up interviews over 6 academic years (BPS:96/98 and BPS:96/01). The current BPS study began with the cohort of beginning students identified in NPSAS:04. The first follow-up occurred 2 years later, in 2006 (BPS:04/06), and the second and final interview will describe the cohort 5 years (also 6 academic years) after the start of postsecondary education (BPS:04/09). This submission concerns the final follow-up with the BPS:04 cohort, BPS:04/09, which will be conducted 6 academic years since the sample first entered postsecondary education. Clearance has already been obtained for the field test student interview (with a waiver of the 60-day Federal Register Notice period for the full-scale data collection when it is submitted for review). Clearance is now requested for an

additional activity to be associated with the full-scale data collection, the collection of postsecondary transcripts for the full-scale student sample.

This package requests clearance for the collection of undergraduate transcripts for all members of the BPS:04/09 full-scale cohort (n=18,644) for each institution attended since sample members first enrolled in postsecondary education during the 2003-04 academic year. A field test collection for this transcript study will not be made. The field test transcript collection for the 2008/09 Baccalaureate and Beyond Longitudinal Study (B&B:08/09), a sister study to BPS, being conducted currently by RTI will serve as an adequate pretest of collection methods and procedures.

b. Legislative Authorization

BPS:04/09 is conducted by NCES within the Institute of Education Sciences, in close consultation with other offices and organizations within and outside the U.S. Department of Education. BPS is authorized under Section 153 of the Education Sciences Reform Act of 2002 (Public Law [P.L.] 107-279, Title 1 Part C), which requires NCES to:

“collect, report, analyze, and disseminate statistical data related to education in the United States and in other nations, including:

(1) collecting, acquiring, compiling... and disseminating full and complete statistics on the condition and progress of education, at the preschool, elementary, secondary, and postsecondary levels in the United States, including data on—

(E) educational access to and opportunity for postsecondary education, including data on financial aid to postsecondary students;”

Section 153 of the Education Sciences Reform Act of 2002 further states that:

“all collection, maintenance, use, and wide dissemination of data by the Institute, including each office, board, committee, and Center of the Institute, shall conform with the requirements of section 552A of title 5, United States Code [which protects the confidentiality rights of individual respondents with regard to the data collected, reported, and published under this title].” (Section 153)

c. Prior and Concurrent Related Studies

The full longitudinal studies program of the NCES, of which BPS is one longitudinal series, has been designed to address the following six topics:

- Undergraduate Access and Choice of Institution,
- Persistence,
- Progress,
- Attainment,

- Graduate/Professional School Access, and
- Rates of Return to Individuals and Society

A prior and continuing approach by NCES has involved the High School Cohort Studies (HSCS). This approach is coordinated with elementary and secondary education, and involves following a particular high school cohort over a long period. *High School and Beyond* (HS&B) and the *National Longitudinal Study of the High School Class of 1972* (NLS:72) provided some information on these six issue topics. In addition, the *National Education Longitudinal Study of 1988* (NELS:88) and the *Education Longitudinal Study of 2002* (ELS:2002) provide additional information on choice and access to postsecondary education. The High School Cohort Studies, while accurately reflecting educational and employment outcomes for a particular age group, do not accurately reflect *all* postsecondary students because of the actual diversity in age and background of these students at any one point in time. For this reason, NCES started the Postsecondary Longitudinal and Sample Survey Studies (PLSSS) program, which involves cross-sections of students attending postsecondary education at specific points in time, regardless of age. This program incorporates base-year data from the cross-sectional NPSAS and extends it through two longitudinal components: BPS and *Baccalaureate and Beyond* (B&B). The chronology of the previous administrations of NPSAS and its associated longitudinal components is presented in table 1.

Table 1. Chronology of NPSAS and its longitudinal components

Base year	First follow-up	Second follow-up	Third follow-up
NPSAS:90	BPS:90/92	BPS:90/94	—
NPSAS:93	B&B:93/94 ¹	B&B:93/97	B&B:93/03
NPSAS:96	BPS:96/98	BPS:96/01	—
NPSAS:2000	B&B:2000/01	—	—
NPSAS:04	BPS:04/06	BPS:04/09	—
NPSAS:08	B&B:08/09	B&B:08/12	—

— Not applicable.

¹ Includes transcript study.

NOTE: NPSAS = National Postsecondary Student Aid Study; BPS = Beginning Postsecondary Students; B&B = Baccalaureate and Beyond.

Undergraduate access and choice of institution. The issues associated with undergraduate access and choice of institution involve how, when, and why students enroll in postsecondary institutions. *Waiting to Attend College: Undergraduates Who Delay Their Postsecondary Enrollment* (Horn, Cataldi, and Sikora 2005) looks at students who delay enrollment into postsecondary institutions. Their characteristics and outcomes are discussed and compared to students who do not delay enrollment. The data used in this report were gathered from multiple datasets such as NPSAS, NELS, and BPS. The *Profile of Undergraduates in U.S. Postsecondary Institutions: 2003-04* (Horn and Nevill 2006) presents data on institution choice, attendance status, and degree program. Analyses of access and choice frequently focus on timing of the decision to enroll, application rates, timing of enrollment, enrollment status (by institution type), and field of study. The areas of interest with regard to these decisions include basic demographic characteristics, the influence of family and peers, high school preparation, participation in special programs in high school, postsecondary characteristics, and financial aid offers.

Of special interest at the postsecondary level is high school preparation. The NPSAS and the BPS datasets provide information on many of these issues. *Bridging the Gap: Academic Preparation and Postsecondary Success of First-Generation Students* (Warburton, Bugarin, and Nunez 2001) uses BPS to examine high school preparation among first-generation students (those students whose parents had no college education) as it relates to enrollment, persistence, and attainment after 6 years. *Mapping the Road to College: First-Generation Students' Math Track, Planning Strategies, and Context of Support* (Horn and Nunez 2000) also focuses on first-generation students, but uses NELS to examine academic preparation as well as parental support and other factors related to attending and persisting in postsecondary education. Drawing on findings derived from a number of datasets including NELS, BPS, and B&B, *Access & Persistence: Findings from 10 Years of Longitudinal Research on Students* (Choy 2002) provides a snapshot view of research in postsecondary education. The report covers factors associated with persistence and attainment such as parent's education and academic preparation. Finally, *Community College Students: Goals, Academic Preparation, and Outcomes* (Hoachlander, Sikora, and Horn 2003) draws from a number of data sources and focuses on students who choose to attend community colleges and examines their degree goals, persistence, and attainment.

Persistence. The issues related to persistence include how and why students continue their enrollment in postsecondary education. Topics included in this area are related to periods of enrollment, transfer, attendance intensity (full or part time), and field of study. Analyses of NCES data concerning postsecondary persistence have been presented in a number of reports, including the following that, using NELS, follow a cohort of traditional students from high school through postsecondary education: *Entry and Persistence of Women and Minorities in College Science and Engineering Education* (Huang, Taddese, and Walter 2000) and *Postsecondary Attainment, Attendance, Curriculum, and Performance: Selected Results From the NELS:88/2000 Postsecondary Education Transcript Study (PETS), 2000* (Adelman, Daniel, and Berkovitz 2003).

The BPS study series allows similar investigations based on all students within a postsecondary education (PSE) cohort (who vary in terms of both age and experience) rather than on a high school cohort (which is homogeneous with regard to age); the *Descriptive Summary of 1995–96 Beginning Postsecondary Students: Three Years Later, With an Essay on Students Who Started at Less-Than-4-Year Institutions* (Berkner, Horn, and Clune 2000) and the *Descriptive Summary of 1995–96 Beginning Postsecondary Students: Six Years Later* (Berkner, He, and Forrest-Cataldi 2002) present comprehensive analyses of persistence among members of the 1995–96 BPS student cohort 3 and 6 years, respectively, following initial entry into postsecondary education. *High School Academic Curriculum and the Persistence Path Through College* uses BPS to examine persistence as it relates to high school preparation. Two cohorts of students who first enrolled in postsecondary education in academic year 1989-90 or 1995-96 are discussed and compared in *College Persistence on the Rise? Changes in 5-Year Degree Completion and Postsecondary Persistence Rates Between 1994 and 2000* (Horn and Berger 2004). This report examines, compares, and tracks the differences in student characteristics and rates at which students in the two cohorts either persisted or completed a degree within 5 years from when they first enrolled.

Progress. Issues of progress in postsecondary education are related to field of study, grades, length of study, transfer between colleges, and timing of college leaving. Topics related to major field of study are of special interest, particularly for education, mathematics, and science majors. Students who attended multiple institutions during their postsecondary education are discussed in *The Road Less Traveled? Students Who Enroll in Multiple Institutions* (Peter and Cataldi 2005). This report profiles students who were co-enrolled, transferred, or attended 2-year institutions and tracks their persistence, attainment, and time-to-degree. Reports such as *Short-Term Enrollment in Postsecondary Education: Student Background and Institutional Differences in Reasons for Early Departure, 1996–98* (Bradburn 2002) focus on students who left postsecondary education before completing a certificate or degree and provides an analysis of the factors associated with attrition, while reports such as *Community College Transfer Rates to 4-Year Institutions Using Alternative Definitions of Transfer* (Bradburn, Hurst, and Peng 2001) focus on attendance patterns and, specifically, students who transfer between institutions. *Moving into Town--and Moving On: The Community College in the Lives of Traditional-Age Students* (Adelman 2005) uses data from several different datasets including NELS, NLS, and BPS to develop transcript-based portraits of traditional-age community college students.

Attainment. Attainment issues involve rates of program completion, degree attainment, and receipt of licenses and certificates. NCES analyses focusing on a cohort of students who graduated high school together and entered postsecondary education within a few years include: *Entry and Persistence of Women and Minorities in College Science and Engineering Education* (Huang, Taddese, and Walter 2000) and *Postsecondary Attainment, Attendance, Curriculum, and Performance: Selected Results From the NELS:88/2000 Postsecondary Education Transcript Study (PETS), 2000* (Adelman, Daniel, and Berkovitz 2003). Both of these reports use NELS data to follow a cohort of high school students. Following the cohorts longitudinally, as through the BPS and B&B series, provides analysts an opportunity to focus on a cohort of beginning students (as in BPS) or bachelor's degree recipients (B&B) rather than a group of traditional students that are homogenous with respect to age. The *Descriptive Summary of 1995-96 Beginning Postsecondary Students: Six Years Later* (Berkner, He, and Forrest-Cataldi 2002) describes postsecondary persistence and attainment within 6 years of initial enrollment in postsecondary education of students who began their postsecondary study in the 1995–96 academic year. *Placing College Graduation Rates in Context: How 4-Year College Graduation Rates Vary With Selectivity* (Horn 2006) highlights how graduation rates of comparable 4-year institutions vary with institution selectivity and size of the low-income population enrolled.

The B&B series, which follows a cohort of bachelor's degree recipients, provides information on time-to-degree. The most recent cohort attained their baccalaureate degrees in the 1999–2000 academic year, and *A Descriptive Summary of 1999–2000 Bachelor's Degree Recipients 1 Year Later, With an Analysis of Time to Degree* (Bradburn, Berger, Li, Peter, and Rooney 2003) provides an overview of time-to-degree and other factors related to bachelor's degree attainment. *Gender Differences in Participation and Completion of Undergraduate Education and How They Have Changed Over Time* (Peter and Horn 2005) examines the rates and differences of undergraduate participation and completion among the different genders of undergraduate students. This report provides an analysis of student demographics, enrollment characteristics, and early employment outcomes of bachelor's degree recipients.

Rates of return. Rates of return refers to the relative payoff of postsecondary education to individuals and society. This issue may involve analyses of earnings streams in the case of individuals, such as *Credits and Attainment: Returns to Postsecondary Education Ten Years After High School* (Zucker and Dawson 2001), which examines the economic and social impact of college course taking. *From Bachelor's Degree to Work: Major Field of Study and Employment Outcomes of 1992–93 Bachelor's Degree Recipients Who Did Not Enroll in Graduate Education by 1997* (Horn and Zahn 2001) examines rates of return in terms of employment outcomes for bachelor's degree recipients in various academic fields. *Students Entering and Leaving Postsecondary Occupational Education* (Hudson, Kienzl, and Diehl 2007) examines who enters postsecondary occupational education, the extent that occupational students persist in postsecondary occupational education and attain their credential goals, and the labor market outcomes for occupational students who earn credentials. Rate of return to society may be addressed through analyses of special benefits to society as through employment in public service professions such as teaching and voluntary participation in community service. The longitudinal studies will allow sufficient time for rate of return issues to be addressed with the BPS and B&B cohorts as they enter the workforce.

d. Prior and Related Transcript Studies

As indicated above, the full-scale data collection for BPS:04/09 will include a transcript study in which postsecondary undergraduate transcripts will be requested from all institutions attended by members of the full-scale BPS:04 cohort. As official institutional records, transcripts are consistently much more reliable sources of academic records and performance—such as grades, coursework by subject area, degree or program completion status, and major—than students' self-reports. This will be the first transcript collection conducted for the BPS sample. Two entities have recommended the addition of an undergraduate transcript collection for BPS – the BPS:04/09 Technical Review Panel (TRP) at their September 2007 meeting and the AERA Think Tank at a November 2, 2007 meeting. BPS TRP and Think Tank members felt that the addition of undergraduate transcripts to BPS would build a richer and more complete picture of the educational experiences of students.

Within the postsecondary studies, B&B has most recently conducted a transcript collection as part of the first follow-up with the B&B:93 cohort, B&B:93/94. A transcript collection is being conducted again as part of B&B:08/09; currently the field test transcript collection is underway. In addition, in 2000, the *National Education Longitudinal Study of 1988* (NELS:88/2000) collected college transcripts for members of the cohort who had pursued any level of postsecondary education. The transcript collection for BPS:04/09 will provide a much-needed information on the course of study of today's beginning postsecondary students. The combination of college transcripts and other study data collected through interviews, file matching, and record abstraction will provide researchers with an important link between academic performance, coursetaking patterns, and outcomes.

e. Study Design

The BPS:04/09 full-scale sample will consist of students eligible to participate in the NPSAS:04 full-scale study who first began postsecondary education during the 2003–04

academic year at U.S. institutions. In addition to the data collection from students, as discussed in the first clearance package for BPS:04/09, some data for the BPS:04/09 full-scale student sample will be obtained from a variety of extant data sources. Student financial aid data will come from the Central Processing System (CPS), which houses and processes data contained in the Free Application for Federal Student Aid (FAFSA) forms; these data will be obtained through file matching/ downloading with this system. Data will also be obtained from the National Student Loan Data System (NSLDS), Pell loan and grant files, and the National Student Clearinghouse (NSC). As part of data collection, these files will be used to assist the process for eligibility determination. The files will also be included directly or as derived variables in producing the final study data file.

Finally, the transcript collection, for which clearance is now requested, will collect postsecondary transcripts from each of the undergraduate institutions attended by full-scale sample members. To facilitate subsequent course coding, institution catalogues will be collected for the academic years 2003–04 through 2008–09, the academic years during which sample members would have been enrolled. Expert coders at RTI will key and code data provided by the transcripts.

2. Purposes and Uses of the Data

The BPS study series is the only nationally representative sample of all students beginning postsecondary education for the first time, including nontraditional students who do not enter postsecondary education immediately after high school, and students in short-term vocational programs as well as those in academic ones. It is also the only study that makes it possible to trace the paths of these students throughout the entire system of postsecondary education over a number of years, rather than focusing only on their experience at the first institution attended.

BPS:04/09 will be the third data collection with students who first entered postsecondary education in 2003–04. The NPSAS:04 survey served as the first, base-year data collection in which the BPS:04/09 sample was identified and initially interviewed. In addition to the usual information about student background, enrollment, and educational financing gathered for all students in NPSAS:04, the BPS cohort members were asked about the reasons for their college choice, satisfaction with the institution, participation in activities, and academic experiences during the first year. This survey data was augmented with self-reported information about their high school curriculum and grades by matching records with the admissions test files from the College Board (SAT) and ACT. The BPS:04 study series, therefore, includes a great deal of data about the high school performance of college freshmen that may be analyzed in relation to their later experiences.

The second data collection with the BPS cohort was conducted in 2006, the third academic year after the sample began postsecondary education. The BPS:04/06 interview was designed to update information on postsecondary enrollment since the base year, as well as demographic characteristics, finances, debts, income, and goals. In addition, the interview collected information on students' experiences while enrolled and as they transitioned to employment. The public use data files from the BPS:04/06 survey were released in June 2007.

BPS:04/09, the second follow-up interview, will be conducted in the sixth academic year since the cohort entered postsecondary education. At the time of the first follow-up (2006), about 15 percent of the BPS sample members had completed programs (primarily vocational certificates and associate's degrees), about 50 percent were still enrolled, and about 35 percent had left without a degree. Assuming that patterns for this cohort are similar to those of BPS:96/01, the majority of those who completed a vocational program, transferred between institutions, and left postsecondary education without a degree did so during the first 2 years.

As official institutional records, transcripts are more reliable sources of academic records and performance than are students' self-reports. The transcript collection for BPS:04/09 will provide much-needed information on the course of study of today's college students as they begin, leave, and re-enter postsecondary study, transfer between institutions, and complete programs at all levels of institutions. The transcript component of the BPS:04 series of studies will afford the opportunity to summarize the undergraduate paths taken by the sample members. The combination of transcripts and other study data collected through interviews, file matching, and record abstraction will provide researchers with an important link between academic performance and outcomes.

Specific questions that can be addressed by the transcript collection include:

- In what types of academic and occupational courses did students enroll? What is the relationship between course taking and persistence in undergraduate enrollment? To what extent does course taking affect postsecondary outcomes, such as degree attainment, additional education, and employment?
- How does course taking among students at public, nonprofit private, and for-profit 4-year, 2-year, and less-than-2-year institutions differ, and are there differential outcomes associated with differences in the patterns of course taking observed?
- How long do first time beginners (FTBs) take from first entering postsecondary education to completing a degree or other postsecondary certificate or diploma?
- What events in the undergraduate enrollment histories of FTBS have taken place, such as transfers, part-time attendance, and stopout periods? What type of institution was first attended? How does time to degree/certificate relate to undergraduate enrollment history?
- How is time to degree related to academic preparation as measured by college entrance examination scores, advanced placement tests, and remedial courses in college?

Answers to these and other questions are vital if policymakers at the local, state, and national levels are to respond adequately to the changing environment of postsecondary education.

3. Use of Information Technology

As a first step in the transcript collection, RTI will collect course catalogues from known institutions enrolling BPS:04 cohort members for the academic years 2003–04 to 2008–09. When the second follow-up interview is completed, any catalogues from new institutions

identified by respondents will also be collected. To the extent that the catalogues are available from an online source—College Source Online—we will obtain catalogues electronically. Any institutions whose catalogues cannot be obtained in that manner will be asked to provide the course catalogues directly to RTI.

Transcripts will be requested for the BPS:04 full-scale cohort from the institutions from which they were sampled as part of NPSAS:04, as well as all additional institutions attended as an undergraduate by the sample member since their first year of enrollment in 2003-04. A complete undergraduate transcript will be requested for each sample member. Several methods will be used for obtaining the transcript data including:

1. Asking institution staff to upload electronic transcripts for sampled students to a secure BPS study website;
2. Asking institution staff to send electronic transcripts for sampled students by secure File Transfer Protocol;
3. Asking institution staff to send electronic transcripts via e-mail with encrypted attachments;
4. Obtaining transcripts directly using a dedicated server at the University of Texas at Austin (described in more detail below) for those institutions participating in the program.

Only as a last resort will institution staff be asked to transmit transcripts to a secure fax that is housed in a locked room at RTI (after sending a confirmed test page).

The fourth collection method listed above is a relatively new process. Approximately 200 institutions currently send and receive academic transcripts in standardized electronic formats via a dedicated server at the University of Texas at Austin. The server now supports Electronic Data Interchange (EDI) and XML formats. Nine (6 percent) of the field test institutions and 70 (6 percent) of the likely full-scale institutions are registered with the server. In addition, 14 of the field test institutions and approximately 60 of the likely full scale institutions are in the test phase with the server, which means that they are preparing and testing using the server but not currently using it to send data. Based on RTI's experience with the collection of transcripts for the B&B:08/09 field test sample, very few institutions participate in the University of Texas program.

After collecting the transcripts and catalogues, data from the transcripts will be keyed, when needed, and the courses coded. Courses will be coded using the most recent version of The College Course Map (CCM), updated to reflect the 2000 Classification of Instructional Programs (CIP). The taxonomy for coding transcripts will be modeled on those used in other postsecondary studies, specifically the NELS:88 and B&B:93 postsecondary transcript collections. A careful review of these taxonomies will be carried out, and refinements made as necessary, to address changes in coursetaking and to adapt to the shifting fields and programs within higher education.

4. Efforts to Identify Duplication

Since the inception of NPSAS and in the planning for the BPS study series, NCES has consulted with other federal offices, such as the Department of Education's Office of Postsecondary Education, the Planning and Evaluation Service, the Congressional Budget Office, the National Science Foundation, and the Office of Management and Budget. In addition, consultations with nonfederal associations such as the American Council on Education (ACE), the National Association of Independent Colleges and Universities (NAICU), and the National Association of Student Financial Aid Administrators (NASFAA) confirm that the data to be collected through the NPSAS and BPS study series are not available from any other sources. These consultations also provided, and continue to provide, methodological insights from the results of other longitudinal postsecondary student studies and assure that the data collected through BPS will meet the needs of the federal government and other relevant organizations.

5. Method Used to Minimize Burden on Small Businesses

Some small businesses (for-profit schools) and other small public and private schools will be contacted as part of the BPS:04/09 transcript collection. RTI will attempt to minimize the intrusion and burden to these schools by working closely with a school-appointed coordinator (e.g., the registrar), before the data collection effort to identify the format in which records are kept and transmitted. Course catalogues will be collected from a public online resource, as available, to minimize burden. To accommodate any constraints imposed by record-keeping systems, schools will be offered alternative methods of providing the requested transcripts described in section B.3.a.

6. Frequency of Data Collection

[P.L.] 107-279 requires that longitudinal studies of beginning postsecondary students (BPS) and graduating seniors (B&B) be based on NPSAS now being conducted every 4 years. The rationale for conducting NPSAS, with follow-up studies through the BPS and B&B series in alternating NPSAS base years, is based on historical need for information on financial aid programs and persistence and attainment in higher education. In particular, the large-scale and rapid changes in federal policy concerning postsecondary student and special support services and other interventions necessitate frequent studies to ensure that policy decisions are based on current information. Policy and program changes affecting elementary and secondary education may also have an ultimate impact on postsecondary enrollment and attainment.

Repeated surveys are also necessary because of rapid changes in the postsecondary environment itself. The size, age, preparation, ability, and financial strength of the student population have changed, and will continue to change because of changes in the size of the traditional postsecondary-age population and the increased likelihood of some demographic groups to seek postsecondary education (e.g., women, minorities, and older students). Changes in the demographic characteristics of students may affect their ability to finance postsecondary education. Repeated surveys will allow researchers to determine whether the increased reliance on federal student loans and reliance on credit may have increased debt burden and reduced plans for further education, such as graduate studies.

Although this is the first time that undergraduate transcripts will be collected for a BPS cohort, NCES believes that the addition of these data will be a valuable asset to the BPS data set and plans to include transcript collections in future BPS cohorts is likely.

7. Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

8. Consultants Outside the Agency

In recognition of the significance of BPS data collection, several strategies have been incorporated into the project work plan that allow for the critical review and acquisition of comments relating to project activities, interim and final products, and projected and actual outcomes. These strategies include consultations with persons and organizations both internal and external to the NCES, the U.S. Department of Education, and the federal government.

Previous BPS implementations have benefited from a standing federal review panel composed of staff from several offices in the Department of Education (OPE and OPP) and representatives of OMB and CBO. Members of this panel also belong to the Technical Review Panel (TRP) for BPS:04/09. The membership of the TRP (see appendix B for a List of TRP Members) represents a broad spectrum of the postsecondary researchers, economists, and members of the financial aid community. Panel members serve as expert reviewers on the technical aspects of the study design, data collection procedures, and instrument design, especially item content and format. The TRP recommended the inclusion of an undergraduate transcript collection during their September 2007 meeting.

9. Provision of Payments or Gifts to Respondents

Institutions will be reimbursed for the cost of preparing and sending transcripts at the institution's standard rate. If additional costs are incurred by the institutions, RTI will reimburse such expenses to the extent that they are reasonable and properly documented.

10. Assurance of Confidentiality

NCES assures participating individuals and institutions that any data collected under BPS and related programs shall be in total conformity with NCES's standards for protecting the privacy of individuals.

BPS:04/09 is authorized under the Education Sciences Reform Act of 2002 (Public Law [P.L.] 107-279, Title 1 Part C), which requires NCES to:

“collect, report, analyze, and disseminate statistical data related to education in the United States and in other nations, including:

(1) collecting, acquiring, compiling... and disseminating full and complete statistics on the condition and progress of education, at the preschool, elementary, secondary, and postsecondary levels in the United States, including data on—

(E) educational access to and opportunity for postsecondary education, including data on financial aid to postsecondary students;”

Section 153 of the Education Sciences Reform Act of 2002 further states that:

“all collection, maintenance, use, and wide dissemination of data by the Institute, including each office, board, committee, and Center of the Institute, shall conform with the requirements of section 552A of title 5, United States Code [which protects the confidentiality rights of individual respondents with regard to the data collected, reported, and published under this title].” (Section 153)

The assurance of confidentiality plan for the BPS:04/09 was developed by NCES and the RTI jointly. BPS:04/09 will conform totally to federal regulations, specifically the Family Education Rights and Privacy Act of 1974 (5 USC 522a), Privacy Act Regulations [34 CFR Part 5b], Section 506(d) of the General Education Provisions Act, as amended by the Hawkins-Stafford Amendments of 1988 [P.L. 100-297], and NCES *Standards and Policies*, which denote four separate laws to protect the confidentiality of individually identifiable information collected by NCES: the Privacy Act of 1974, the Education Sciences Reform Act of 2002, the USA Patriot Act of 2001, and the E-Government Act of 2002.

The plan for maintaining confidentiality includes notarized nondisclosure affidavits obtained from all personnel who will have access to individual identifiers (copies of the agreement and affidavit are provided in appendix C). Also, personnel training will cover several topics, including the meaning of confidentiality; controlled and protected access to computer files under the control of a single data base manager; built-in safeguards concerning status monitoring and receipt control systems; and a secure, staffed, in-house computing facility.

Furthermore, the Department has established a policy, OM:5-101 (last updated July, 7, 2005), 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 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. Materials related to these security features are provided in appendix C.

All data transferred for the BPS study will be transmitted through a secure server at NCES. The system requires that both parties to the transfer be registered users of the NCES Members Site and also that their Members Site privileges be set to allow use of the new service. This service is designed for the secure transfer of electronic files containing personally

identifying information (i.e., data protected under the Privacy Act or otherwise posing risk of disclosure).

This secure server has been used successfully and without incident on the NPSAS:08 and B&B:08/09 studies, currently being conducted for NCES by RTI. Procedures have been put into place for using the server to transfer confidential data. The system requires that both parties to the transfer be registered users of the NCES Members Site and that their Members Site privileges be set to allow use of the secure data transfer service. These privileges are set up and carefully controlled by NCES' Chief Technology Officer (CTO). This service has been designed by ED/NCES specifically for the secure transfer of electronic files containing personally identifying information (i.e., data protected under the Privacy Act or otherwise posing risk of disclosure) and can be used for NCES-to-Contractor, Contractor-to-Subcontractor, Subcontractor-to-Contractor, and Contractor-to-Other-Agency data transfers. The party uploading the information onto the secure server at NCES is responsible for deleting the file(s) after the successful transfer has been confirmed. Data transfers using this system will include notification to IES, the NCES CTO, and the NCES Deputy Commissioner as well as the NCES project officer. The notification will include the names and affiliations of the parties in the data exchange/transfer and the nature and approximate size of the data to be transferred.

We will use this electronic system for submitting data containing potentially identifying information (such as SSNs, names and dates of birth of our sample members) along with their survey ID (not the same ID that is available on the restricted-use data). As an additional precaution, we will use WinZip (at least version 10), with the highest level of encryption available (currently FIPS approved 256-bit AES encryption) and a strong password to further protect the file.

Additionally, RTI maintains a standing Committee on Human Subjects to ensure that all Institute surveys of human populations comply with applicable regulations concerning informed consent, confidentiality, and protection of privacy. This group serves as the Institute's Institutional Review Board (IRB) as required by law (45 CFR #46). RTI policy requires that the IRB independently review and approve the study design, instruments, and procedures, and monitor the study annually to ensure that sample members' rights are fully protected.

Study notification materials sent to institutions (see appendix D) will convey the extent to which respondent identifiers and all responses will be kept confidential. A disclosure notice is included in the mail out material sent to institutions indicating that all data from these records will be combined with others into statistical summaries and tables and may not be used in identifiable form for any purpose unless otherwise compelled by law (Education Sciences Reform Act of 2002, Section 183). This disclosure notice is provided to institutions for inclusion in student files.

11. Sensitive Questions

Course grades and grade point averages collected from the transcripts could be considered sensitive. Procedures have been implemented to provide assurances to respondents

about the voluntary nature of participation in the study and the confidential treatment of survey responses. A discussion of these procedures appears in section A, item 10, above.

12. Estimates of Response Burden

Burden estimates for the transcript collection activity are provided in table 2, and estimated costs to respondent institutions are presented in table 3. The response time for participating institutions is expected to vary depending on the number of sampled students who attend the institution and the method selected for transmitting the transcripts. Institutions will be offered five different methods for providing responses, including:

1. uploading electronic transcripts to a secure study website;
2. sending electronic transcripts by secure File Transfer Protocol;
3. sending electronic transcripts via e-mail with encrypted attachments;
4. sending electronic transcripts via a dedicated server at the University of Texas at Austin; and
5. as a last resort, transmitting transcripts via a secure fax that is housed in a locked room at RTI after a test submission of nonsensitive data confirms that the institution has the correct fax number.

13. Estimates of Cost

There are no capital, startup, or operating costs to respondents for participation in the project. No equipment, printing, or postage charges will be incurred to respondents.

Table 2. Estimated burden on institutions for BPS:04/09 full-scale transcript collection

Anticipated number of institutions	Percent expected response rate	Number of institutions	Average time burden per response ¹	Range of response times	Total time burden (hours)
2,910	90	2,619	3 hrs.	.5 to 20 hrs.	7,857

¹ Transcript time is specified by institution not by student. The higher burden per response is due to the greater number of transcripts to be processed by each institution.

NOTE: BPS:04/09 = 2004/09 Beginning Postsecondary Students Longitudinal Study.

Table 3. Estimated costs to institutions for the BPS:04/09 full-scale transcript collection

Expected number of transcripts	Response rate	Number of transcripts collected	Number of institutions	Average transcripts per school	Rate per transcript	Average cost per school	Total cost
30,800	88%	27,104	2,619	11	\$5	\$55	\$135,520

NOTE: BPS:04/09 = 2004/09 Beginning Postsecondary Students Longitudinal Study.

14. Costs to Federal Government

There are no capital, startup, or operating costs to institution or student respondents for participation in the project. No equipment, printing, or postage charges will be incurred. The

contract costs are estimated to be \$4,000,000 (a request for proposals is expected to be released within the next 30 days). Projected estimates for response burden and costs for the transcript collection are based on experiences from a similar collection underway for B&B:08/09. Institutional response burden for transcript collection is difficult to estimate due to the anticipated variation in response times. We assume that each institution will need approximately 2 hours to prepare and review instructions prior to performing transcript collection. Then, we are assuming an average of approximately 5 minutes per transaction.

15. Reasons for Changes in Response Burden and Costs

Response burden and costs will increase for BPS due to the addition of the collection of postsecondary transcripts for all sample members from all the schools that they attended. Institutional response burden for transcript collection is difficult to estimate due to the anticipated variation in response times. However, the figures presented in tables 2 and 3 are believed to portray an accurate assessment of the estimated time required for participation. Certain assumptions guide the estimates for response burden. We assume that each institution will need approximately 2 hours to prepare and review instructions prior to performing transcript collection. Then, we are assuming an average of approximately 5 minutes per transaction. Costs will increase due to the collection, and keying and coding of transcripts.

16. Publication Plans and Time Schedule

The operational schedule for the BPS:04/09 transcript collection is shown in table 4.

Table 4. Operational schedule for BPS:04/09 transcript collection

Activity	Start date	End date
Contacts with institutions to request course catalogues and transcripts	11/1/2008	12/1/2009
Collect and code student transcripts	12/1/2008	6/30/2010

17. Approval to Not Display Expiration Date for OMB Approval

The expiration date for OMB approval of the information collection *will be displayed* on transcript collection materials. No special exception to this request is requested.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement identified in the Certification for Paperwork Reduction Act Submissions of OMB Form 83-i.