

2011-12 NATIONAL POSTSECONDARY STUDENT AID
STUDY (NPSAS:12)

Supporting Statement
Part A
Request for OMB Review (SF83i)

Submitted by
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2011-12 National Postsecondary Student Aid Study (NPSAS:12)

A. Justification

1. Circumstances Making Collection of Information Necessary

a. Purpose of this Submission

This document supports the clearance of selected materials and procedures for institution contacting and enrollment list collection under the Paperwork Reduction Act of 1995 and 5 CFR 1320, as amended, for the 2011-12 National Postsecondary Student Aid Study (NPSAS:12). A separate request for review pertaining to student record data and interview collections will be submitted in September 2010. This study is being conducted by RTI International¹ and its primary subcontractor MPR Associates under contract to the U.S. Department of Education's (ED's) National Center for Education Statistics (NCES) (Contract Number ED-IES-09-C-0039). Other subcontractors include Branch Associates, Kforce Government Solutions, Inc. (KGS), Research Support Services, Millennium Services 2000+, Inc., and consultants Dr. Cynthia Decker and Ms. Andrea Sykes.

This submission requests reinstatement of the previously obtained clearance for the 2008 cycle of the National Postsecondary Student Aid Study (OMB No. 1850-0666 v.4). Following the field test study in 2010, the National Center for Education Statistics (NCES) will provide the Office of Management and Budget (OMB) with a memorandum summarizing any changes planned for the full-scale data collection, and a revised OMB package. We anticipate only minimal changes between the field test and the full-scale implementation and, therefore, we will seek a waiver of the 60-day Federal Register Notice for the full-scale data collection submission in the second, final clearance package for the field test (focused on the student data collection).

NPSAS:12 is a nationally representative study of how students and their families finance education beyond high school. NPSAS was first implemented by NCES during the 1986–87 academic year to meet the need for national-level data about significant financial aid issues. Since 1987, NPSAS has been fielded every 3 to 4 years, most recently during the 2007–08 academic year. This submission is for the eighth cycle in the series that will be conducted during the 2011–12 academic year. NPSAS:12 also will serve as the base year study for the Beginning Postsecondary Students Longitudinal Study (BPS), a study of first-time postsecondary students that will focus on issues of persistence, degree attainment, and employment outcomes.

Previous studies related to or based on data from NPSAS or its longitudinal spin-offs are listed in appendix A. Appendix B lists the study's Technical Review Panel (TRP). A sample of the Confidentiality Agreement and Affidavit of Nondisclosure completed by all project staff having access to individually identifiable data are provided in appendix C. Introductory letters to institutions and students selected for participation in the NPSAS study are found in appendix D. Appendix E presents the script used by institutional contactors to verify eligibility and confirm contact information with sampled institutions. A list of endorsing institutions and associations supporting NPSAS:12 is provided in appendix F.

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

b. Legislative Authorization

NPSAS:12 is conducted by NCES within the Institute of Education Sciences (IES) in close consultation with other offices and organizations within and outside the U.S. Department of Education (ED). NPSAS is authorized under the Higher Education Opportunity Act of 2008, 20 U.S.C. § 1015:

(A)(k) Student aid recipient survey

(1) Survey required

The Secretary, acting through the Commissioner for Education Statistics, shall conduct, on a State-by-State basis, a survey of recipients of Federal student financial aid under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42—

(A) to identify the population of students receiving such Federal student financial aid;

(B) to describe the income distribution and other socioeconomic characteristics of recipients of such Federal student financial aid;

(C) to describe the combinations of aid from Federal, State, and private sources received by such recipients from all income categories;

(D) to describe the—

(i) debt burden of such loan recipients, and their capacity to repay their education debts; and

(ii) the impact of such debt burden on the recipients' course of study and post-graduation plans;

(E) to describe the impact of the cost of attendance of postsecondary education in the determination by students of what institution of higher education to attend; and

(F) to describe how the costs of textbooks and other instructional materials affect the costs of postsecondary education for students.

(2) Frequency

The survey shall be conducted on a regular cycle and not less often than once every four years.

(3) Survey design

The survey shall be representative of students from all types of institutions, including full-time and part-time students, undergraduate, graduate, and professional students, and current and former students.

(4) Dissemination

The Commissioner for Education Statistics shall disseminate to the public, in printed and electronic form, the information resulting from the survey.

c. Prior NPSAS Studies

As noted above, NPSAS:12 will be the eighth NPSAS in a series dating back to 1986–87. The first in the series, the 1987 National Postsecondary Student Aid Study (NPSAS:87), based on a sample of students enrolled in the fall term of 1986, is not completely comparable to later studies. Beginning in 1989–90, NPSAS surveys sampled students enrolled at any time during a full academic year, so that students enrolled only during the summer or spring terms, as well as those who began at any time in institutions (primarily vocational) not on a traditional calendar system, were included. Additional detailed information about each of the prior NPSAS studies and related longitudinal studies conducted by NCES can be found at <http://nces.ed.gov/surveys/npsas/>.

Since the inception of NPSAS, the data collection techniques and sources used for these studies have improved and expanded over time. NPSAS:90 was based on institutional data transcribed on paper forms, computer-assisted telephone interviews (CATIs), and only one external data source, the Pell Grant payment file. NPSAS:93 introduced the computer-assisted data entry (CADE) system, allowing institutions to enter data from student records directly into electronic files. This facilitated matching student records to federal student loan and the Pell Grant files. NPSAS:96 made more use of electronic data files to supplement the survey information from CADE and CATI. In addition to the Pell Grant files, student records were matched with the electronic Institutional Student Information Records (ISIR) of the Central Processing System (CPS) for federal financial aid applications, the federal student loan history records of the National Student Loan Data System (NSLDS), and the files of the College Board and ACT for student test scores on the SAT and ACT tests. NPSAS:04 introduced a web-based student interview that allowed both self-administration and interviewer-administration via CATI. This multi-mode approach to data collection has increased flexibility and convenience for study participants and reduced burden. NPSAS:04 also saw more institutions submitting student-level data electronically for entire school systems, which reduced the burden for individual campuses and increased the efficiency of data submission. NPSAS:08 continued the multi-mode data collection approach and added the National Student Clearinghouse (NSC) as an administrative data source.

NPSAS is the only periodic, nationally representative survey of student financial aid. There is no other single national database containing student level records for students receiving aid from all of the numerous and disparate programs funded by the federal government, the states, postsecondary institutions, employers, and private organizations. NPSAS:12 data will allow for the continued evaluation of trends regarding financial aid and postsecondary enrollment. This information is critical to the development of government policy regarding higher education. The NPSAS studies reflect the changes made in government guidelines for financial aid eligibility and availability, and provide a good measure of the effect of those changes.

The NPSAS studies also inform policymakers what is working and what needs changing in the future. A central focus of all of the NPSAS studies is the effect of the federal financial aid programs. Major changes in federal financial aid policy are usually made every 5 to 6 years through Reauthorization of the Higher Education Act (HEA), the legislation establishing the basic rules for the federal grant, loan, and work-study programs, including eligibility criteria and need analysis requirements. The federal financial aid described in the NPSAS:90 and NPSAS:93 studies was awarded under the policies set in the 1986 Reauthorization of HEA. The

Reauthorization of 1992 made many substantial changes. It established a single need analysis formula for Pell Grants and the other need-based federal programs, eliminated home equity from consideration in need analysis, created an unsubsidized student loan program for dependent students which has no need requirements, and increased borrowing limits in the federal loan programs. The results of the NPSAS:96 survey reflected these changes. For example, the proportion of middle-income students with federal loans increased substantially at four-year colleges, and annual student loan and cumulative debt amounts increased at all income levels and at all types of institutions.

NPSAS:2000 and NPSAS:04 reflected the Reauthorization of 1998 legislation, which made relatively few changes in the federal financial aid programs. The changes to need analysis were minor. The student income protection allowance increased somewhat, requiring a smaller contribution from prior year earnings. The Pell Grant maximum was increased and student loan amount limits were kept at the same levels that had been in effect since 1993, although interest rates were lower. Since the basic financial aid programs and policies had not changed since NPSAS:96, the results of the NPSAS:2000 and NPSAS:04 surveys created a clearer picture of the underlying trends in the effect tuition increases had on various categories of students.

NPSAS:04 was innovative in a number of ways. The sample size was substantially increased to yield about 90,000 respondents (compared with 60,000 in NPSAS:2000). For the first time, the NPSAS sample was designed to provide representative state-level estimates of undergraduates in 12 selected states, which has provided data for comparisons of differences in college prices and financial aid programs among states. As noted above, in addition to the usual telephone interviews, for the first time the NPSAS:04 student interview was offered as a self-administered web survey. Also for the first time, the NPSAS survey data was used to estimate the average amounts of the federal education tax benefits (Hope, Lifetime Learning, and Tuition and Fees Deductions) and their distribution among students. Nearly one-half of all undergraduates were found to benefit from one of these federal tax reductions.

NPSAS:08 had an even further expanded sample size of more than 130,000 students and included state-representative undergraduate samples for four degree-granting institutional sectors in 6 states: California, Georgia, Illinois, Minnesota, New York, and Texas. It reflected the legislative changes of the Higher Education Reconciliation Act of 2005 which increased Stafford loan limits, expanded PLUS loans to graduate students and added the ACG and SMART grant programs. NPSAS:08 contained a representative sample of likely grant recipients to study the impact of these new Federal grants. For the first time the sample weights in NPSAS:08 were adjusted to the sum of net Stafford loan disbursements instead of gross loan commitments. This proved to provide a more accurate estimate of Stafford borrowing but required that all previous surveys based on gross Stafford loan commitments, NPSAS:96, NPSAS:00, and NPSAS:04, also have their weights revised to net disbursements so they would be comparable. In addition to documenting the continuing increases in college prices, these surveys showed the parallel increases in grant awards and student loan borrowing. In 2007–08, some 80 percent of all full-time undergraduates were receiving financial aid, and the average amount received was \$12,700. The percentage of full-time undergraduates receiving grant aid (64 percent) continued to be greater than the percentage with student loans (53 percent) in 2007–08.

d. Prior and Related Studies

Two longitudinal studies conducted as part of the Postsecondary Sample Survey program within the Postsecondary, Adult, and Career Education (PACE) division of NCES were designed to address a variety of issues regarding higher education. Based on samples of students attending postsecondary education in a particular year regardless of age, each of these studies incorporates base year data from the cross-sectional NPSAS and extends it through longitudinal follow-up components focusing on first-time students and on recent college graduates in alternate NPSAS survey years: Beginning Postsecondary Students (BPS) and Baccalaureate and Beyond (B&B). The chronology of the previous administrations of the NPSAS study 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	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	—
NPSAS:12	BPS:12/14	BPS:12/17	—

— Not applicable.

NOTE: BPS = Beginning Postsecondary Students; B&B = Baccalaureate and Beyond.

The six major issues addressed in these PACE studies are:

1. undergraduate access/choice of institution;
2. persistence;
3. progress/curriculum;
4. attainment/outcome assessment;
5. access to graduate programs; and
6. benefits of postsecondary education to individuals and society.

Specific studies that explore some of these issues and have been based on previous NPSAS, BPS, or B&B data are listed in appendix A for reference.

2. Purposes and Uses of the Data

This section provides information on the purposes of NPSAS and an overview of the primary research issues it addresses.

a. NPSAS:12 Purposes

The fundamental purpose of NPSAS is to create a research data set that brings together information about a variety of programs for a large sample of undergraduate and graduate students. NPSAS provides the data for comprehensive descriptions of the undergraduate and

graduate student populations in terms of their demographic characteristics, academic programs, types of institutions attended, attendance patterns, and employment. Demographic and enrollment data establish the appropriate context that allows researchers and policy analysts to address basic issues about postsecondary affordability and the recipients of the student assistance. These results are published in four statistical briefs with accompanying web tables: a profile of undergraduates, a report on undergraduate financing, a profile of graduate students, and a report on the financing of graduate studies. The financing reports describe the “sticker” price, the net price after grant aid, and the “out-of-pocket” price (reduced by both grant and loan aid).

A second purpose of NPSAS is to gather base-year data on a subset of students who become the sample for a longitudinal study. NPSAS:12 will establish the base year cohort for a Beginning Postsecondary Student study of college freshmen with a follow-up survey 3 years later (BPS:12/14) and another follow-up in 2017. A section of the student interview will capture information about student knowledge, experiences, and perceptions of the costs and benefits of education to support analysis of student choices related to major, persistence, and completion.

A third purpose of NPSAS – new in 2012 – is to provide a nationally representative sample that can be used to rigorously address fundamental research questions through experimental research methodologies. NCES plans to expand the use of NPSAS through collaboration with the National Center for Education Research (NCER). NPSAS provides a rich source of data that could potentially be used to support experimental research funded by NCER. Interested researchers will be asked to submit a proposal that details their experimental design and analysis plans. Upon grant review and approval, RTI will conduct any needed data collection and/or file-matching activities and deliver a restricted data file to NCES to provide to the grantee for analysis. More detail about the possibility of working with NCER will be provided in the forthcoming request for OMB approval of student data collection in September 2010.

b. NPSAS:12 Research and Policy Issues

Many of the important questions that NPSAS: 2012 aims to address are the same as in past years. Price increases, net price levels, and increases in student loan debt will continue to be central issues. The NPSAS:12 data will be used to address policy issues relating to the changes in federal financial aid programs resulting from the College Cost Reduction and Access Act of 2007 (CCRAA) and the Higher Education Opportunity Act of 2008 (HEOA). These legislative changes included increases to the Pell maximum award, reductions in the interest rate for subsidized Stafford loans, more consumer transparency on college tuition and lender disclosures about loan terms. There are other potentially far-reaching legislative changes on the horizon such as the Student Loan and Fiscal Responsibility Act of 2009 (SAFRA) which may affect how the federal student loan program operates.

Some of the primary research and policy issues to be addressed through the use of NPSAS:12 data will likely be:

- (1) Student demographics;
 - What is the distribution of student enrollment among types of institutions by gender, race/ethnicity, age, dependency, and income?
 - What types of institutions are serving the largest proportions of low-income, non-traditional, and ethnic minority students?

- What proportion of undergraduates are first generation college students, and what types of institutions are they attending?
 - What proportion of students are immigrants or children of immigrants, and what types of institutions are they attending?
 - How much are students with disabilities participating in postsecondary education?
 - What proportion of students enrolled in postsecondary education are veterans and what types of institutions do they attend?
- (2) Academic preparation and programs;
- What proportion of undergraduates enroll in college courses while still in high school?
 - What proportion of college students have taken remedial courses?
 - What types of students are enrolled in vocational certificate, associate's, and bachelor's degree programs, and what are their fields of study?
 - What is the extent of internet-based and other distance education, and what types of institutions and students are using it?
 - What are students' primary purposes for enrolling in postsecondary education and their educational goals?
- (3) Financial aid;
- What proportion of students have financial aid need and what is the average amount of need by income?
 - What proportion of students receive Federal Pell grants and where do they attend college?
 - What proportion of students are receiving aid from states, institutions, employers, and private sources, and what are the average amounts received?
 - What proportion of students are receiving need-based or merit-based aid?
 - How does the amount and type of aid vary by dependency and income level?
 - What is the ratio of federal to non-federal aid at various types of institutions?
 - What is the ratio of grants to loans at various types of institutions?
 - What proportion of students receive veterans and other Department of Defense benefits?
- (4) Price of attendance;
- What are the differences in the average tuition and total price of attendance by type of institution and among students by dependency, income, and full-time or part-time attendance status?

- What is the average net price of attendance (student budget minus financial aid) at various income levels at different types of institutions?
- (5) Student borrowing;
- What are the differences in the percentage borrowing and the average amounts borrowed through the federal student loan programs by institution type, attendance status, class level, and income?
 - What proportion of students borrow the maximum Stafford loan amounts?
 - What is the difference in the proportion of students receiving subsidized or unsubsidized Stafford loans by dependency and income level?
 - What is the relationship between the level of student debt and persistence in postsecondary education?
 - What is the average cumulative debt of students by class level, especially among graduating college seniors?
 - What proportion of students borrow private loans, in what amount, and how does this borrowing vary by institution type?
- (6) Student employment;
- What proportion of students engage in paid work while enrolled and what are the average hours per week they work?
 - What is the average amount earned from work while enrolled?
- (7) Sources of funds;
- What types of financial support are dependent students receiving from their parents?
 - What is the estimated proportion of students who might benefit from the federal education tax benefits (such as the Hope and Lifelong Learning tax credits) based upon family income, tuition paid, and grant aid received?

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. As the publications listed in appendix A indicate, since inception, the NPSAS, BPS, and B&B series have resulted in numerous NCES publications addressing these issues. The data from these studies have also been used extensively to explore PACE program issues through the NCES Postsecondary Education Descriptive Analysis Report (PEDAR) series.

3. Use of Information Technology

To ensure the secure transmission of sensitive information on the student enrollment lists, we will provide the following options to institutions: (1) upload encrypted student enrollment list files to the project's secure website using a login ID and "strong" password provided by RTI, or (2) provide an appropriately encrypted list file via e-mail (RTI will provide guidelines on encryption and creating "strong" passwords).

We expect that very few, if any, institutions will ask to provide a paper list (in the NPSAS:08 full-scale study no institutions submitted a paper list). The data security plan will

outline protocols for handling faxed materials that conform to data security requirements. The original file or paper list containing all students with SSNs will be kept through data collection in order to resolve any issues with student identification that occur during data collection. These files will be deleted and lists shredded after data collection. RTI will ensure that the SSNs for non-selected students are securely discarded.

4. Efforts to Identify Duplication

NCES has consulted with other federal offices, such as the ED's Office of Postsecondary Education, the Planning and Evaluation Service, the Congressional Budget Office (CBO), and the Office of Management and Budget (OMB). Consultations with non-federal 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 NPSAS are not available from any other sources. These consultations provide methodological insights from the results of other financial aid investigations and assure that the data collected through NPSAS meet the needs of the federal government and other relevant organizations.

5. Method Used to Minimize Burden on Small Businesses

The burden associated with enrollment list collection is relatively minor for all institutions, including small businesses that may be contacted as part of NPSAS:12 (for-profit schools and other small public and private schools). NPSAS:12 is asking for a minimal set of variables on the enrollment lists. Institutions are offered alternative methods of providing requested data, including uploading to a secure website or emailing encrypted list files. We will attempt to minimize the intrusion and burden to such schools by working closely with a school-appointed coordinator before the data collection effort to identify the sources of information within the school and the format in which records are kept.

6. Frequency of Data Collection

This cycle of NPSAS will take place 4 years after the last data collection. The rationale for conducting NPSAS periodically is based on the historical need for information on financial aid programs. The large-scale and rapid changes in federal policy concerning postsecondary student aid necessitate frequent studies. Eligibility restrictions change, size of grant and loan amounts fluctuate, and the balance between various aid options changes dramatically. Since these changes affect students' ability to finance postsecondary education and the level of debt that students are accumulating, data collections every 3 to 5 years are necessary. A recurring study is essential to helping predict future costs for financial aid because loan programs create continued obligations for the federal government as long as the loans are being repaid.

Repeated surveys, such as NPSAS, are also necessary because of the dynamic nature of the postsecondary environment. For example, for-profit institutions have recently assumed a much more prominent role than was the case in years past. Changes in private-sector lending, increases in tuition and fees, and changes in federal student aid policies (such as the recent increase in maximum Pell Grant awards) further highlight the need for periodic data collections. Effects of these changes on federal policy and postsecondary education participation create an opportunity, as well as a need, for monitoring on a regular basis.

7. Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

8. Consultants Outside the Agency

Recognizing the significance of NPSAS 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 NCES, the U.S. Department of Education (ED), and the federal government.

Previous NPSAS implementations have benefited from a technical review panel composed of staff from several offices in ED (the Office of Postsecondary Education [OPE] and the Office of Policy and Planning [OPP]) and representatives of OMB and CBO. Staff from these offices will also belong to the Technical Review Panel (TRP) for NPSAS:12. The membership of the TRP (see appendix B) represents a broad spectrum of the postsecondary and financial aid communities. The non-federal members serve as expert reviewers on the technical aspects of the study design, data collection procedures, and instrument design. The TRP will review the plans for study design and key topics during their spring 2010 meeting. Subsequent to the TRP meeting, a separate request for OMB review related to student-level data collection activities (student interviews and student record collection from institutions) will be submitted (September 2010).

9. Provision of Payments or Gifts to Respondents

No payments or gifts to responding institutions will be given.

10. Assurance of Confidentiality

NCES assures participating individuals and institutions that any data collected under NPSAS and related programs shall be in total conformity with NCES's standards for protecting the confidentiality of identifiable information about individuals. The Education Sciences Reform Act (ESRA) of 2002 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]. (20 U.S.C. § 9573(a) (2009))

RTI and its subcontractors will secure all data and protect the confidentiality of all participants in NPSAS. Data security and confidentiality protection procedures are in place to ensure that RTI complies with all privacy requirements, including:

- The Statement of Work of this contract;
- Privacy Act of 1974 U.S.C. § 552(a) (2009);
- The U.S. Department of Education Incident Handling Procedures (February 2009);

- The U.S. Department of Education General Handbook for Information Technology Security General Support Systems and Major Applications Inventory Procedures (March 2005);
- The U.S. Department of Education, ACS Directive OM: 5- 101, Contractor Employee Personnel Security Screenings.
- Family Educational and Privacy Act of 1974, 20 U.S.C. § 1232g (2009);
- Part C of ESRA, 20 U.S.C. §§ 9541–9548 (2009);
- Federal Statistical Confidentiality Order of 1997, 62 Fed. Reg. 35,047 (June 27, 1997);
- Related regulations, including but not limited to: 45 C.F.R. pt. 5b (2009); and
- Any new legislation, which impacts the data collection through this contract.

RTI will also 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), Office of Management and Budget (OMB) Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance.

RTI will also adhere to NCES Statistical Standards, as described at the website: http://nces.ed.gov/statprog/2002/std4_2.asp.

The NPSAS:12 Data Security 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 implemented are 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. The Data Security plan will also detail guidelines and procedures 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. We do not anticipate receiving many enrollment lists via FAX (none were received in NPSAS:08), but any that are received will be securely shredded upon study completion. Electronic enrollment lists will reside within an independent secure network, and be deleted upon study completion.

There are several security measures in place to protect data during file matching procedures. 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 with the exception of the National Student Clearinghouse (NSC) which has its own secure FTP site. All data transfers will be encrypted using FIPS 140-2 validated encryption tools.

Furthermore, 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. The Department directive that contractors must comply with is OM:5-101, which was last updated on 7/7/05. 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. Materials related to these security features are provided in appendix C.

Study notification materials sent to institutions will describe the voluntary nature of the NPSAS:12 survey and convey the extent to which respondent identifiers and all responses will be kept confidential. Similarly, the scripts to be read by telephone staff will be very specific in the assurances made to respondents and contacts. Contacting materials are presented in appendix D. The following confidentiality language is provided in the study brochure that is supplied to all sample members:

The 2011-12 National Postsecondary Student Aid Study is conducted under the authority of the Higher Education Opportunities Act (HEOA) of 2008 (20 U.S.C. § 1015) and the Education Sciences Reform Act (ESRA) of 2002 (20 U.S.C. § 9512) which authorizes NCES to collect and disseminate information about education in the United States. Collection is most often done through surveys.

NCES is required to follow strict procedures to protect the confidentiality of persons in the collection, reporting, and publication of data. All individually identifiable information supplied by individuals or institutions to a federal agency may be used only for statistical purposes and may not be disclosed or used in identifiable form for any other purpose, unless otherwise compelled by law (20 U.S.C. § 9573).

11. Sensitive Questions

Institutions will be asked to provide data for students on the enrollment lists (including name, contacting information, social security number (SSN), and date of birth (DOB)) that are sensitive due to their personally-identifying nature. However, it is essential that these items are collected on the enrollment lists. In this first phase of the study (the current request for institution contacting and list collection), information from enrollment lists will be used to 1) conduct early file matching activities to screen the sample of potential first-time beginners (FTBs), 2) exclude minors from the sample, and 3) select the student sample and conducting initial tracing and locating activities. The early file matching activities will be an essential step in accurately identifying BPS cohort members. As described in B.2.b., past experience has shown that accurate identification of FTBs has been extremely difficult. A review of data from NPSAS:04 (the last NPSAS to serve as base year for a BPS cohort) showed that approximately 22 percent of the false positive cases would have been prevented if NSLDS data had been available prior to sampling. Matching to NSC would be expected to identify about 7 percent of the cases matching to NSC as false positives, and matching to both NSC and NSLDS would be expected to identify about 16 percent of all potential FTBs over the age of 18 as false positives (based on NPSAS:04 data). For NPSAS:12, a pre-sampling match to NSLDS and NSC will identify cases with evidence of prior enrollment to ensure that they are not sampled as potential FTBs.

SSN will be needed in the next phase of the study to 1) conduct file matches to administrative records and 2) maintain the sample for the longitudinal study (BPS). In the forthcoming (September 2010) OMB package to request approval for student interviews, record abstractions, and file matching, we will describe the sources and procedures for administrative record matching. File matching to administrative records is a crucial element of the NPSAS study and would not be possible without the collection of SSNs. Data obtained from file matching will both minimize respondent burden and increase data quality.

12. Estimates of Response Burden

The response time for participating institutions is expected to vary widely. First, eligibility screening calls will be made to each sampled institution to confirm eligibility and verify contact information prior to mailing study information. Next, eligible institutions will be asked to complete an Institution Registration Page (IRP) to provide basic information about institutional characteristics. Finally, institutional coordinators will be asked to provide electronic enrollment lists of all students enrolled during the academic year. Institutions will be offered two methods for providing their enrollment lists:

- (1) upload encrypted student enrollment list files to the project's secure website using a login ID and "strong" password provided by RTI, or
- (2) provide an appropriately encrypted list file via e-mail.

Based on NPSAS:08 results, we expect that most NPSAS:12 enrollment lists will be uploaded to the project website (about 95 percent for the field test study and 99 percent for the full-scale study.) We anticipate that very few enrollment lists will be sent via e-mail.

Table 2. Maximum estimated burden on institutions for NPSAS:12 enrollment list collection

Data collection activity	Institution sample	Expected eligible institutions	Number of responding institutions	Percent expected response rate	Average time burden per response (hours)	Range of response times (hours)	Total time burden (hours)
NPSAS:12 field test							
Eligibility screening calls	300	291	300	†	.08	.03-.10	24.00
Institutional registration page	†	291	262	90	.08	.05 -.11	20.96
Institutional enrollment lists	†	291	150	52	2.75	1.0-6.0	412.50
Field test total							457.46
NPSAS:12 full-scale study							
Eligibility screening calls	1,671	1,654	1,671	†	.08	.03-.10	133.68
Institutional registration page	†	1,654	1,588	96	.08	.05 -.11	127.04
Institutional enrollment lists ¹	†	1,654	1,406	85	2.75	1.0-6.0	3,866.50
Full-scale total							4,127.22

† Not applicable.

Table 3 presents estimated costs to institutions participating in the NPSAS:12 enrollment list data collections, both field test and the full-scale studies.

Table 3. Maximum estimated costs to institutions for the NPSAS:12 enrollment list collection

Data collection activity	Institution sample	Expected eligible institutions	Number of responding institutions	Percent expected response rate	Average time burden per response (hours)	Total time burden (hours)	Rate per hour	Total cost
NPSAS:12 field test	300	291	150	52	2.91	457.46	\$17	\$7,777
NPSAS:12 full-scale study	1,671	1,654	1,406	85	2.91	4,127.22	17	70,163

13. Estimates of Cost

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

14. Costs to Federal Government

A summary of estimated costs to the federal government for NPSAS:12, shown in table 4, are categorized by field test, full-scale study, and total costs. Included in the contract estimates are all staff time, reproduction, postage, and telephone costs associated with the management, data collection, analysis, and reporting for which clearance is requested.² A more detailed breakdown of contract costs is provided in table 5.

Table 4. Individual and total costs to the National Center for Education Statistics (NCES) for the NPSAS:12 field test and full-scale implementations

NPSAS:12 implementations	Costs to NCES
Field test	
Salaries and expenses	\$62,370
Contract costs	5,895,934
Total	5,958,304
Full-scale study	
Salaries and expenses	197,739
Contract costs	19,559,152
Total	19,756,891
Total costs	
Salaries and expenses	260,109
Contract costs	25,455,086
Total	25,715,195

NOTE: Costs presented here do not include base or award fee.

² This package requests clearance for field test and full-scale institution contacting and enrollment list collection. A subsequent request will relate to student data collection. Costs shown here are for the full study, including institution and student data collection efforts.

Table 5. Contract costs for NPSAS:12

Study area and task		Budgeted amount
110	Post award conference	\$40,891
120	Schedules	57,488
130	Monthly reports	803,152
140	Integrated monitoring system	587,665
150	Technical review panels	1,521,527
Field test (FT) data collection		
211	Institution sampling	173,953
212	Institution contacting	584,390
213	Student sampling	134,559
220	FT RIMG/OMB forms clearance	160,116
231	Instrumentation	1,571,218
232	Tracing	123,657
233	Training for institution level data collection	99,756
234	Training for CATI data collection	138,464
235	Institution level data collection	168,915
236	Web/CATI data collection	675,734
237	Data processing	716,487
240	Methodology report	157,591
Full-scale (FS) data collection		
311	Institution sampling	56,935
312	Institution contacting	950,674
313	Student sampling	545,454
320	FS RIMG/OMB forms clearance	109,159
331	Instrumentation	1,087,697
332	Tracing	1,391,671
333	Training for institution level data collection	183,487
334	Training for CATI data collection	589,646
335	Institution level data collection	602,650
336	Web/CATI data collection	7,840,060
337	Data processing	1,602,292
338	Weighting, imputations & nonresponse bias analysis	617,271
339	Data disclosure planning and prevention	48,872
340	Methodology report	259,782
Descriptive reporting		
410	First Look	193,000
420	Data analysis system	364,102
430	Additional special tabulations	355,533
440	Descriptive reports	531,525
450	Respond to information requests	388,137
460	Final technical memo	21,579
Total		25,455,089

NOTE: Costs presented here do not include base or award fee. CATI = computer assisted telephone interview.

15. Reasons for Changes in Response Burden and Costs

Projected estimates for response burden and costs for NPSAS:12 are based on experiences from prior rounds of NPSAS. Using time burden data for similar institutional data collection tasks, we estimate the burden associated with the enrollment list collection to be approximately 3 hours per institution. The estimated hourly cost to institutions was raised from \$14 for NPSAS:08 to \$17 for NPSAS:12 to reflect salary increases at those institutions.

This request constitutes a change in response burden and costs since the previous collection approval has expired. The last approved burden for NPSAS was significantly larger than the current request because it covered full-scale data collection from both institutions and individual students. This submission is for field test data collection from institutions only. Burden estimates for field test data collection from students will be submitted in a separate package in September 2010.

16. Publication Plans and Time Schedule

The formal contract for NPSAS:12 requires the following reports, publications, or other public information releases:

- descriptive summaries of significant findings for dissemination to a broad audience;
- a detailed methodological report describing all aspects of the full-scale study design and data collection procedures (a working paper detailing the methodological findings from the field test will also be produced);
- complete data files and documentation for research data users in the form of both a restricted-use electronic codebook (ECB), a public-use Data Analysis System (DAS), and a recently developed easy to use version of the DAS, called QuickStats in which users create their own tables and charts using pre-defined categories from a subset of DAS variables, and a newer, more powerful application currently under development, PowerStats, which allows users to create their own tables and charts using all of the variables, in addition to conducting regression analysis;
- special tabulations of issues of interest to the higher education community, as determined by NCES.

The operational schedule for the NPSAS:12 field test and full-scale study is shown in table 6.

Table 6. Operational schedule for NPSAS:12

NPSAS:12 activity	Start date	End date
Field test		
Contacts with institutions to request enrollment lists	Oct. 4, 2010	Feb. 7, 2011
Enrollment list collection	Jan. 24, 2011	April 23, 2011
Select student sample	Feb. 1, 2011	April 23, 2011
Collect student data from institution records	Mar. 15, 2011	Jun. 30, 2011
Self-administered web-based data collection	Mar. 15, 2011	Jun. 30, 2011
Conduct telephone interviews of students	Apr. 7, 2011	Jun. 30, 2011
Process data, construct data files	Jan. 25, 2011	Aug. 30, 2011
Prepare/update field test reports	Apr. 4, 2011	Oct. 26, 2012
Full-scale study		
Contacts with institutions to request enrollment lists	Sept. 12, 2011	Jun. 15, 2012
Select student sample	Jan. 24, 2012	Jul. 16, 2012
Collect student data from institutional records	Jan. 31, 2012	Sept. 28, 2012
Self-administered web-based data collection	Feb. 7, 2012	Sept. 28, 2012
Conduct telephone interviews of students	Feb. 28, 2012	Sept. 28, 2012
Process data, construct data files	Nov. 3, 2011	Jun. 17, 2013
Prepare/update reports	Aug. 24, 2012	Sept. 30, 2014

Note: The current request for OMB review includes only institution contacting and enrollment list activities for the field test and full-scale studies.

17. Approval to Not Display Expiration Date for OMB Approval

The expiration date for OMB approval of the information collection *will be displayed* on data collection instruments and 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.