

## Memorandum

United States Department of Education  
Institute of Education Sciences  
National Center for Education Statistics

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DATE: January 12, 2012  
FROM: Elise Miller, NCES  
TO: Shelly Martinez, OMB  
THROUGH: Kashka Kubzdela, NCES  
SUBJECT: Focus Groups with High School Seniors and Their Parents, Guidance Counselors, and College and University Representatives, Consumer Information Disclosure Requirements (OMB# 1800-0011 v.167)

### Submittal-Related Information

The following material is being submitted under the U.S. Department of Education's (Department's) Generic Clearance for Customer Service Satisfaction Collections (OMB# 1800-0011). This generic clearance provides for the Department to conduct surveys and other studies to evaluate customer satisfaction. The request for approval described in this memorandum is to conduct focus groups with graduating seniors, their parents, and guidance counselors (i.e., consumers) and college and university representatives responsible for managing disclosure data requirements. The results of these focus groups will be used by the National Postsecondary Education Cooperative (NPEC) to make suggestions to NCES and the Department about tools that could be developed to assist institutions in meeting statutory data disclosure requirements; enhance the quality, consistency, and usability of that data required to be disclosed; and possibly link the new Common Education Data Standards (CEDs) to data disclosure requirements in an effort to help to standardize them. NPEC's mission is to promote the quality, comparability, and utility of postsecondary data and information that support policy development at the federal, state, and institutional levels. Because data disclosure requirements and data reporting requirements overlap, such resources and information will also help institutions improve the quality of the data they report to the Department. The subject of the focus group is how institutions currently collect, manage, and disseminate disclosure data and how consumers (i.e., students, parents, and guidance counselors) access the data.

### Background

The *Higher Education Act* of 1965 (HEA), as amended by the *Higher Education Opportunity Act* of 2008 (HEOA), includes many disclosure and reporting requirements. A disclosure requirement is

information that a postsecondary education institution is required to distribute or make available to another party, such as students or employees. A reporting requirement is information submitted to the Department or other agencies, such as the information institutions submit annually through the Department's Integrated Postsecondary Education Data System (IPEDS). Disclosure and reporting requirements sometimes overlap. For certain topics, institutions are required to make information available to students or others and to submit the information to the Department.

Prospective and current students, parents, counselors, researchers, and policymakers rely heavily on the Internet to obtain information about higher education institutions. However, the information that institutions are required to disclose may be difficult to find, compare, and use. One problem faced by consumers is the inaccessibility of information provided by institutions under the HEA. Institutions may have multiple offices responsible for collecting and distributing information. Decentralized information management means that even within a single institution, processes and standards for information collection, formatting, and dissemination may be varied. In addition, the unit responsible for the information at one institution may be different than the unit responsible for the same information at another institution. For example, graduation rate information is provided by the registrar's office at some institutions and by the institutional research office at others. This problem can be compounded by the inconsistency in how institutions provide the required disclosure information to consumers. Some institutions mix the HEA-required disclosures with other information in varying combinations. Other institutions maintain a portal web page that provides a single entry point from which HEA-required disclosure information can be obtained through hyperlinked lists. Although these portals help students and others find relevant information, consumers need to know that such a website exists in order to find it and they need to understand and correctly interpret the information provided.

To compare disclosure information across institutions, users also face a high degree of variation in both the content and structure of institutions' websites. For example, a review of existing consumer information portal pages for postsecondary institutions found a variety of titles, including the following:

- Consumer Information
- Student Consumer Information
- Public Disclosure
- University Disclosure Statements
- Your Right to Know
- Student Right to Know
- Statements, Disclosures
- Federal Compliance
- Federal Disclosure Notices
- Federal Compliance & Student Consumer Information

The National Postsecondary Education Cooperative (NPEC) was established by the National Center for Education Statistics (NCES) in 1995 as a voluntary organization that encompasses all sectors of the postsecondary education community including federal agencies, postsecondary institutions, associations, and other organizations with a major interest in postsecondary education data collection. NPEC's mission is to promote the quality, comparability, and utility of postsecondary data and information that support policy development at the federal, state, and institutional levels. In 2009, NPEC released *Information Required to be Disclosed under the Higher Education Act of 1965: Suggestions for Dissemination* to provide institutions with guidance on how to identify and meet their obligation to disclose information as required under the HEA. Subsequent analysis sponsored by NPEC which focused on the extent to which institutions have implemented the suggestions put forward in the 2009 NPEC report revealed ongoing inconsistencies, confusing terminology, and non-user-friendly websites that prevent easy comparisons of information across institutions by consumers.

To promote the quality, comparability, and utility of postsecondary data, NPEC and NCES are interested in learning more about the challenges that prevent institutions from consistently disclosing quality and comparable data to consumers, and learning from consumers what they know about this information, what information they regard as most important, and how they prefer to access and utilize the disclosure information. Because there is overlap between data disclosed by institutions and data they report to the Department through IPEDS, NCES is interested in learning about resources and information that would be helpful to institutions in improving the quality of the data they are disclosing. In addition, NCES is interested in learning about resources and information that may be helpful to institutions in using the Department's Common Education Data Standards (CEDS) to assist them in completing disclosure requirements. NCES is authorized to set data standards, and information from these focus groups will help NCES develop suggested standards that will improve the quality and comparability of data being disclosed and reported by institutions.

The purpose of conducting these focus groups is to identify ways to improve the quality, comparability, and utility of data that institutions are required to disclose under the HEA. Specifically, these focus groups will explore what resources and information can be provided to institutions, especially those that are small and under-resourced, to help them meet disclosure requirements consistently.

The information collected and synthesized in the focus groups will be summarized in a topical brief that will be published by NPEC. NPEC will disseminate this report to the public, NCES, and Department officials and will use the information provided in the brief to make suggestions to NCES and the Department about tools that could be developed to assist institutions in meeting statutory data disclosure requirements, and to enhance the quality, consistency, and usability of the data that institutions are required to disclose.

## Design and Context

The current request is for approval to conduct four focus groups in February and March 2012. The topical brief based on the results will be prepared in April 2012. Westat, the contractor, will conduct four (4) focus groups total for this project. Westat will recruit for two of the focus groups, which will be held at a focus group facility in Philadelphia, PA. Shugoll Research, Inc., a focus group facility in Bethesda, MD, will recruit the other two groups and hold those two groups at their facility. Westat has prepared screeners for Shugoll to use to recruit the participants.

The focus groups to be held in Philadelphia, PA, will be held with representatives from 2-year and 4-year postsecondary institutions in the Philadelphia area (focus groups 1 and 2). The purpose of these focus groups is to learn about any challenges institutions may have in meeting their disclosure responsibilities. Focus group participants will be asked questions about their familiarity with the disclosure items, any challenges collecting and preparing this information, and whether a template and other strategies would be helpful to them. They will also be asked to review a sample template that could be used to organize and present disclosure information on their websites. The information shared in this group will be used to help NCES in assisting institutions meet their disclosure responsibilities.

The focus groups to be held in Bethesda, MD, will be held with high school seniors and one of their parents for a total of 4 student/parent pairs (focus group 3) and with high school guidance counselors (focus group 4). The purpose of these focus groups is to learn if consumers are aware of the disclosure requirements; to learn about which items students, parents, and guidance counselors think are most important in the college search process; and to determine useful ways of locating and presenting this information on postsecondary institutions' websites so it is understandable and clear. Consumers also will be asked to rank the importance of the disclosure information. The information shared in this group will be used to help NCES develop a template for how the disclosure information might be presented on institutions' websites.

The four focus groups are specifically designed to capture the experiences and opinions of the following:

- Focus Group #1: Representatives from 2-year postsecondary institutions in the Philadelphia, PA, area, with no more than 2,000 students, offering associate degrees and/or less-than-4-year certificates, responsible for or familiar with the disclosure requirements or responsible for submitting IPEDS data to ED.
- Focus Group #2: Representatives from 4-year postsecondary institutions in the Philadelphia, PA, area, with no more than 6,000 students, offering bachelor degrees, responsible for or familiar with the disclosure requirements or for submitting IPEDS data to ED.
- Focus Group #3: Four pairs consisting of a parent with his or her child from the DC metropolitan area, the child is a public high school senior and is planning to attend a 4-year college leading to a bachelor's degree, parent/child have conducted a college search using

the Internet, parent has no more than 2 years of college and has not graduated from college, low to moderate income, mixed race/ethnicity and gender.

- Focus Group #4: High school guidance counselors working in public or charter schools in the DC metropolitan area, at least 3 years' experience counseling prospective college students, at least ¼ of their time spent on counseling students related to the college search process, counselors work in schools where at least 15 percent of the students are low income, has earned master's degree, a mix of counselors from schools in various counties in DC, MD, and VA, mixed gender.

Westat will directly recruit the institutional representative participants for the Philadelphia focus groups, using a script/screener prepared by Westat (Attachment I). Westat will provide NCES a list of 2- and 4-year institutions in the Philadelphia area that meet the above criteria for Focus Groups #1 and #2. Using this list, NCES will provide Westat with the contact information for each of the IPEDS keyholders for use in recruiting. Participants for the Bethesda consumer focus groups will be recruited by Shugoll, a professional focus group recruiting facility located in Bethesda, Maryland. Recruitment for these groups will be based on screening questions prepared by Westat (Attachment II) to determine eligibility for the groups. Attachment III provides additional detail about recruitment procedures, including confirmation e-mails and a sample flyer. Attachment IV contains three focus group protocols: one each for the institutional representatives, the guidance counselors, and the graduating seniors and their parents. Attachment V contains additional materials to be used in the focus groups, including the screen shots of the draft sample NCES disclosure data template/checklist that will be discussed in the institutional representative focus groups, screen shots of the sample institutional website pages that will be discussed in the consumer focus groups, and a ranking sheet for the consumer focus groups. Attachment VI contains the Assurance of Confidentiality (consent forms).

The focus groups will be held in professional focus group facilities that are centrally located, easily accessible by car and public transportation, and allow for professional audio recording. Sessions will be held at times convenient for working adults and students' schedules. Each focus group, of approximately 90 minutes' duration, will be conducted by Westat researchers with extensive experience in moderating focus groups of youth and adults. A Westat note-taker will attend each of the groups and take notes from behind the one-way mirror. The audio recordings will be made available to Westat for use in fleshing out the notes, but they will not be shared with NCES staff.

The institutional representative focus group questions are organized into five main sections:

- Knowledge about Disclosure Requirements
- Experiences Gathering, Preparing, and Presenting Disclosure Data
- Challenges Encountered
- Resources That Would Help
- Responses to the Draft Disclosure Template/Checklist

The consumer focus group questions are organized into four main sections:

- Familiarity with Disclosure Information

- Interpretation of Disclosure Information Titles
- Importance Assigned to Disclosure Information
- Presentation of Disclosure Information

## Assurance of Confidentiality

Focus group participants will be informed that their participation is voluntary and that the information they provide will be combined with the responses of others in a summary report that does not identify anyone as an individual, and that their answers may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law [Education Sciences Reform Act of 2002 (ESRA 2002) 20 U.S.C., § 9573] (see Attachment VI). The signed consent forms will be kept separately from the interview files in a locked cabinet for the duration of the study and will be destroyed after the background paper is completed and finalized. The student-parent consent process will include procedures for obtaining parental permission and student permission (for students over and under the age of 18) to audio record the discussion. Contractor staff have in all instances signed the NCEs Affidavit of Non-disclosure.

## Project Schedule

### Schedule for Disclosure Data focus groups

Disclosure Data Groups	Start date	End date
Recruitment for institutional representative focus groups	From OMB approval	2/17/12
Recruitment for consumer focus groups	From OMB approval	2/29/12
Conduct four focus groups	2/23/12	3/7/12
Finalize notes	2/24/12	3/9/12
Organize, synthesize, analyze data	3/12/12	3/28/12
Draft topical brief and PowerPoint presentation	3/26/12	4/13/12
Finalize topical brief based on NCEs review	4/24/12	4/30/12

## Estimate of Hour Burden

Four focus groups are planned with nine participants for each focus group, with the exception of the parent/child group that will be held with 8 participants. Each focus group is expected to last approximately 90 minutes. The focus group burden is therefore 53 hours, exclusive of travel time.

However, there is also a screener that is estimated to be taken by about 70 individuals and will take on average 8 minutes to complete; this constitutes an additional 10 hours, for a total burden of 63 hours.

<b>Response Type</b>	<b># Respondents</b>	<b># Responses</b>	<b>Burden Minutes per Respondent</b>	<b>Total Burden Hours</b>
Screener	70	70	8	10
Focus Group	35	35	90	53
<b>Total</b>	<b>70</b>	<b>105</b>	-	<b>63</b>

## **Estimate of Costs for Recruiting and Paying Respondents**

To thank the respondents for their travel to the focus group facility, time, and effort, the four participating students and their parents will receive \$100 per pair, and the guidance counselors, and institutional representatives from under-resourced schools, who are often more difficult to recruit due to their schedules, will receive \$75.

## **Cost to Federal Government**

The cost of conducting the focus groups will be \$155,881, under the Westat subcontract to Coffey Communications, including recruitment for two focus groups and coordination with the focus group facilities to recruit two consumer groups and coordinate logistics for four groups, facility rentals, protocol and screener development, preparation of OMB and IRB packages, preparation of focus group materials, synthesis, analysis and writing of topical brief and preparation of PowerPoint presentation, and payment of participant incentives.