

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

STUDENT INTERVIEW AND STUDENT RECORDS

Supporting Statement Part A  
Request for OMB Review  
(OMB # 1850-0666 v.10)

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

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### **3. 2011-12 National Postsecondary Student Aid Study (NPSAS:12)**

#### **A. Justification**

##### **1. Circumstances Making Collection of Information Necessary**

###### **a. Purpose of this Submission**

4. The National Center for Education Statistics (NCES), within the U.S. Department of Education (ED), is requesting approval for conducting student interviews, collecting student records, and file matching for the 2011-12 National Postsecondary Student Aid Study (NPSAS:12), a nationally representative study of how students and their families finance education beyond high school. A separate request for review of NPSAS:12 materials and procedures for institution contacting and enrollment list collection was approved by OMB in July 2011 (OMB# 1850-0666 v.9). Data collection for this study is being carried out for NCES by RTI International<sup>1</sup> and its primary subcontractor, MPR Associates, under 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.
5. We are requesting clearance for instrumentation and procedures for full scale NPSAS:12 data collection. This submission includes a memorandum summarizing changes planned for the full-scale data collection based on the field test results. There are minimal changes between the field test and full-scale implementation, therefore this request utilizes the approved waiver of the 60-day Federal Register Notice for full-scale student data collection.
6. 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 conducted during the 2007–08 academic year. This implementation is the eighth in the series and 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.
7. Previous studies related to or based on data from NPSAS or its longitudinal spin-offs are listed in appendix A. A description of the procedures in place for the linkages to administrative data sources is provided in appendix B. Appendix C lists the study’s Technical Review Panel (TRP). Data security language for vendor contracts is shown in Appendix D. A sample of the confidentiality pledge and affidavit of nondisclosure completed by all project staff having access to individually identifying data are provided in appendix E. A list of endorsing institutions and associations supporting NPSAS:12 is provided in appendix F. Letters to institutions and students selected for participation in the NPSAS study are found in appendix G. Appendix H presents the NPSAS:12 student interview data collection instrument. Appendix I is a table of the data elements collected

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<sup>1</sup> RTI International is a trade name of Research Triangle Institute.

from student records, and Appendix J contains the user's guide and tutorial script for providing student record data.

**b. Legislative Authorization**

8. 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:
9. (A)(k) Student aid recipient survey
  10. (1) Survey required
    11. 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 Title IV—
      12. (A) to identify the population of students receiving such Federal student financial aid;
      13. (B) to describe the income distribution and other socioeconomic characteristics of recipients of such Federal student financial aid;
      14. (C) to describe the combinations of aid from Federal, State, and private sources received by such recipients from all income categories;
      15. (D) to describe the—
        16. (i) debt burden of such loan recipients, and their capacity to repay their education debts; and
        17. (ii) the impact of such debt burden on the recipients' course of study and post-graduation plans;
      18. (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
      19. (F) to describe how the costs of textbooks and other instructional materials affect the costs of postsecondary education for students.
    20. (2) Frequency
      21. The survey shall be conducted on a regular cycle and not less often than once every four years.
    22. (3) Survey design
      23. 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.
    24. (4) Dissemination
      25. 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

26. 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>.
27. Since the inception of NPSAS, the data collection techniques and sources used for these studies have improved and expanded. The collection of data from institutions has shifted from transcribed paper forms to digital collection, and student interviews from computer-assisted telephone interviews to (largely) web-based student interviews. Rather than relying upon one external data source, NPSAS now draws upon many sources, including the National Student Loan Data System (NSLDS), the College Board and ACT, and the National Student Clearinghouse.
- 28.

### d. Prior and Related Studies

29. In alternate survey years NPSAS provides base year data for longitudinal follow-up studies focusing on first-time students and on recent college graduates: 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.

30. **Table 1. Chronology of NPSAS and its longitudinal components**

31. Base year	32. First follow-up	33. Second follow-up	34. Third follow-up
35. NPSAS:90	36. BPS:90/92	37. BPS:90/94	38. —
39. NPSAS:93	40. B&B:93/94	41. B&B:93/97	42. B&B:93/03
43. NPSAS:96	44. BPS:96/98	45. BPS:96/01	46. —
47. NPSAS:2000	48. B&B:2000/01	49. —	50. —
51. NPSAS:04	52. BPS:04/06	53. BPS:04/09	54. BPS:04/11
55. NPSAS:08	56. B&B:08/09	57. B&B:08/12	58. —
59. NPSAS:12	60. BPS:12/14	61. BPS:12/17	62. BPS:12/19 <sup>1</sup>

63. — Not applicable

64. <sup>1</sup> Tentative.

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

### e. Study Design for NPSAS:12

66. Data for NPSAS:12 will be collected from both postsecondary institutions and students. The target population includes all students enrolled in postsecondary institutions in the 50 states and the District of Columbia<sup>2</sup> during a given academic year (2010–11 for the field test and 2011–12 for the full-scale study). A stratified sample of students within the sampled institutions will be selected.
67. Institutions will be asked to provide information from student financial aid records and other institutional sources. Much of the required student financial aid data contained in institutional records is also available in the 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. This process will reduce the data collection burden on sampled institutions. As in NPSAS:08, institutions will be asked to verify institutional characteristics and financial aid program participation and to provide enrollment lists for sampling purposes. Data from students will be collected via a web-based survey or through computer-assisted telephone interview (CATI).
68. Additional data for the NPSAS:12 student sample will be obtained from a variety of administrative data sources. These include queries of CPS, the NSLDS, Pell loan and grant files, the NSC, and vendors of national undergraduate, graduate, and professional student admission tests including ACT and SAT scores. A description of the procedures in place for the linking to administrative data sources is provided in Appendix B.

## 2. Purposes and Uses of the Data

69. The fundamental purpose of NPSAS is to provide a comprehensive description of **who** is enrolled in credit-bearing instruction in title IV institutions, **how** they are enrolled (e.g. intensity and mode), and **how they pay** for their postsecondary education. With respect to how students pay for their schooling, NPSAS is the nation’s premier source of evidence, bringing together federal, state, and institutional sources of student aid; self-help; employer and other private assistance; paid employment; and private borrowing. Demographic and enrollment data establish the appropriate context that allows research and policy analysts to address basic issues about postsecondary affordability and the functioning of financial aid programs. 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).
70. 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 Students Study of students who are just beginning their college education, with a follow-up survey 2 years later (BPS:12/14) and another follow-up in 2017. A section of the student interview will capture information about student knowledge,

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<sup>2</sup> After extensive review, NCES chose to remove Puerto Rico from the national sample for NPSAS:12. Since the sample is national, not at the jurisdiction level, no information about PR students is lost as a result of this decision. Moreover, because postsecondary education in PR is so dissimilar to that in the 50 states, the presence of PR postsecondary students in the sample was found to skew key national estimates for Hispanic student populations.

experiences, and perceptions of the costs and benefits of education to support analysis of student choices related to major, persistence, and completion.

71. A third purpose of NPSAS – new in 2012 – was 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. To date, however, none of the proposals submitted has been funded.



**72. NPSAS:12 Research and Policy Issues**

73. Since NPSAS:08 was conducted there have been significant changes in U.S. postsecondary education, including important federal statutory and regulatory changes, and the articulation of new Executive policy priorities. Some have implications for NPSAS:12 as a cross-sectional study, while others may be best addressed via NPSAS's longitudinal follow-ups. Still others will have effects that are *not* appropriately addressed by nationally-representative sample studies, but by student record data systems in the American states, or other data sources, such as the Current Population Survey. Below we identify some of the key changes, and their implications for NPSAS.
74. *The College Cost Reduction and Access Act of 2007 (CCRAA)*. Pub. L. 110-84 enacted a series of amendments to existing legislation governing student financial assistance programs, most notably increasing Pell funding, creating the TEACH grant, reducing interest rates on certain federal loans, and introducing a new income-based repayment (IBR) plan for holders of federal student loans. NPSAS:12 is best suited to evaluate how CCRAA-inspired changes in Pell affect student aid packaging and students' use of other funding streams (e.g., private loans, work, credit cards). Those parts of CCRAA that impact loan repayment are best assessed in NCES longitudinal studies, such as Baccalaureate and Beyond (B&B). The current iteration of B&B, which began following the graduating class of 2007-08 and used NPSAS:08 as its base year, will provide information on student loan repayment histories one, four, and ten years post-completion.
75. *The Ensuring Continued Access to Student Loans Act of 2008 (ECASLA)*. In addition to raising annual Stafford loan limits, Pub. L. 110-227 authorized the Department to purchase certain Ford Federal Education Loan Program (FFELP) loans and convert them to Federal Direct Loan Program (FDLP) loans. While the majority of ECASLA's impact is administrative in nature, NPSAS:12 will provide information on Stafford loan uptake and will be able to shed additional light on a potentially problematic phenomenon: students' failure to borrow federal loans at their personal maximums before turning to less financially-advantageous forms of credit.
76. *The Post-9/11 Veterans Education Assistance Act of 2008 (Post-9/11 GI Bill)*. A component of Pub. L. 110-252, the Post-9/11 GI Bill provided up to four academic years of tuition benefits for certain members of the military (or their spouse or children, should the benefit be transferred) who served on active duty after September 11, 2001, and implemented additional provisions to provide lower-cost access to certain private institutions. Over the past eighteen months, NCES has worked extensively with the Veterans Affairs (VA) to identify how we can collaborate to best understand the impact of this legislation on student outcomes. Both VA and NCES have concluded that the best mechanism for doing so is a VA-sponsored longitudinal study of veterans benefit recipients, as the proportion of veterans who would otherwise be sampled by NCES studies—which must be representative of *all* postsecondary students—would be too small for analysis. However, NPSAS:12 will provide insight into the proportion of veterans who, for whatever reason, enter postsecondary education but elect not to avail themselves of this benefit.

77. *The Higher Education Opportunity Act of 2008 (HEOA)*. Pub L. 110-315 reauthorized the Higher Education Act of 1965, as amended. Among its many provisions were requirements for institutions to offer in-state tuition rates for members of the armed forces and their immediate families, further increases to maximum Pell awards, requirements for improved consumer information and enhanced institutional disclosures, and extension of Federal Work Study and Perkins loans. NPSAS:12 will be able to identify how HEOA affects student and/or parent financing strategies in the light of increased aid via Pell and, for military students/dependents, reductions in tuition costs.
78. *The Health Care and Education Reconciliation Act of 2010, and the Student Loan and Fiscal Responsibility Act (SAFRA)*. By incorporating key provisions of SAFRA via rider, Pub L. 211-152 implemented several reforms to federal student aid programs, most notably the elimination of FFELP loans. The law also extended loan forgiveness programs and reduced monthly loan payments for some borrowers. Because the vast majority of the impact of SAFRA will be transparent to the student, NPSAS:12 is not well suited to evaluate its effects. However, both B&B:08 and its successor, B&B:16, will be able to document changes in loan repayment behavior, including loan forgiveness program use, pre- and post-enactment.
79. *Presidential and Departmental priorities for subbaccalaureate education*. Motivated at least in part by President Obama's challenge that all adults pursue at least one additional year of education or training after high school, both the Executive Office of the President (i.e., the Office of Management and Budget and the Council of Economic Advisers) and senior Department leadership (e.g., the Office of the Under Secretary of Education) have expressed interest in expanding our knowledge of student outcomes associated with credentials below the baccalaureate. As a result, NCES has expanded the size of the NPSAS:12 sample that will be drawn from this degree space. Its follow-up study, the Beginning Postsecondary Students Longitudinal Study (BPS), will also be used to gather better data on the early labor market experiences of students who leave postsecondary education with a certificate or associate's degree.
80. *Program Integrity and "Gainful Employment"*. The U.S. Department of Education has promulgated regulations that aim to promote integrity in its title IV student aid programs, and, specifically, a regulation to implement the "gainful employment" provision of the Higher Education Act. Regulatory action – and the growing importance of for-profit education – indicate clearly the need for expanded data collection with respect to for-profit providers of postsecondary education, and NPSAS:12 responds to this by revising its sampling plan and establishing separate sampling strata for two and four-year for profit higher education institution.
81. Of course, many of the questions that can be addressed via NPSAS:12 are of perennial interest to researchers and policymakers. They include:
82. Student demographics;
- What is the distribution of student enrollment among types of institutions by gender, race/ethnicity, disability status, 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?
- What proportion of students enrolled in postsecondary education are veterans and what types of institutions do they attend?

83. Academic preparation and programs;

- What proportion of undergraduates earn college credits that are recognized upon enrollment in postsecondary education?
- What proportion of college students have taken remedial courses?
- What types of students are enrolled in 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, both for individual courses and entire programs of study?

84. Financial aid;

- What proportion of students have -- according to federal student aid methodology -- financial aid need? 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?

85. 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?

86. 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 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?
- What is the relationship, if any, between the elimination of the Federal Family Education Loan (FFEL) program and student and/or family borrowing behaviors?

87. 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?

88. 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?

89. 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

90. To improve the efficiency of student data collection and virtually eliminate the need to burden the respondent with a re-contact for data retrieval, NPSAS:12 will use web-based student interviewing. The modes of data collection will be a web-based, online survey that is self-administered by sample members and a web-based telephone interview administered by trained interviewers at RTI. The survey instrument displays questions for the respondent or interviewer in program-controlled sequences on a computer screen. Computer control of the survey administration and the monitoring of responses offer substantial improvements in data quality and data collection efficiency over standard paper and pencil surveys. The incidence of missing or inconsistent data is greatly reduced because questionnaire skip patterns are computer-controlled. Moreover, invalid entries or entries inconsistent with previous responses are rejected by the computer and must be corrected by the respondent or interviewer during the interview.

91. That the student interview is web-based and, therefore, computer controlled adds considerable flexibility to the interviewing process. The wording and presentation of subsequent questions can be tailored to reflect answers already received as well as pre-loaded information. On-line help screens are also available to provide respondents with more in-depth explanations of questions and examples of the categories of answers listed.

An important feature of the online interview is that respondents can complete portions of the interview and save their responses then return and complete the interview at a later time, rather than requiring the interview be entirely completed at once. These features reduce participant burden while ensuring that the most accurate data are collected.

#### **4. Efforts to Identify Duplication**

92. NCES has consulted with other federal offices, such as ED's Office of Postsecondary Education (OPE), the Office of Planning, Evaluation and Policy Development (OPEPD), 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.
93. For instance, over the course of many meetings with Veterans Affairs (VA) staff, NPSAS staff are now aware of a longitudinal study that VA will conduct on veterans using education benefits. This information prevented NPSAS from adding questions that are best captured in this new longitudinal study by VA.

#### **5. Method Used to Minimize Burden on Small Businesses**

94. The student survey for NPSAS:12 does not involve small businesses or entities. However, for-profit schools and other small public and private schools were asked to provide enrollment lists and student records as part of NPSAS:12. To minimize burden on all participating institutions, NPSAS:12 offers institutions a choice of several methods for submitting the requested data. Each institution may select the format that it finds most convenient and least burdensome. Available methods include: (1) uploading an electronic file to the project's secure web site; (2) downloading an Excel workbook from the project's web site, then uploading the completed file to the site; (3) use of a web-based data entry interface. This interface has recently been redesigned to allow users to enter data in the manner most convenient for them.
- 95.

#### **6. Frequency of Data Collection**

96. 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.

97. 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 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, to monitor this rapidly changing situation on a regular basis.

## **7. Special Circumstances of Data Collection**

98. No special circumstances of data collection are anticipated.

## **8. Consultants outside the Agency**

99. 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, ED, and the federal government.

100. Previous NPSAS implementations have benefited from a standing federal review panel composed of staff from several offices in ED (the Office of Postsecondary Education [OPE] and the Office of Planning, Evaluation, and Policy Development [OPEPD]) and representatives of OMB and CBO. Members of this panel also belong to the Technical Review Panel (TRP) for NPSAS:12. The membership of the TRP (see appendix C) 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, especially item content and format. The TRP reviewed the plans for study design and key topics during their July 2010 and August 2011 meetings.

## **9. Provision of Payments or Gifts to Respondents**

101. In an effort to maximize response rates, the use of incentives is proposed for two purposes—to encourage early response using the self-administered web survey, and to limit nonresponse bias through refusal conversion. All cases will be offered an incentive of \$30 during both the early response period (the 3-week period prior to the start of outbound CATI data collection) and the nonresponse conversion period (which begins immediately after the 3-week period). The use of incentives provides significant advantages to the government in terms of increased overall response rates, timely data collection, and reduction of nonresponse bias. In addition, the use of incentives can also result in decreased data collection costs.

## **10. Assurance of Confidentiality**

102. 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:

103. 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))

104. RTI and its subcontractors will secure all data and protect the privacy 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 5 U.S.C. § 552(a) (2010);
- The U.S. Department of Education Incident Handling Procedures (2010);
- 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. § 1232(g) (2010);
- Part C of Education Sciences Reform Act of 2001, 20 U.S.C. §§ 9541–9548 (2010);
- 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 (2010); and
- Any new legislation, which impacts the data collection through this contract.

105.

106. To ensure that respondent privacy is protected at all times, RTI requires that vendors who assist in locating and tracing sample members follow procedures to appropriately safeguard personally identifying information. RTI’s vendor contracts outline requirements for information security policies and assessments, security awareness training, physical and environmental security, monitoring, and access control. They also specify the means by which information may be transmitted between RTI and the contractor. Appendix D documents the data security language contained in vendor contracts.

107. 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.

108. RTI will also adhere to NCES Statistical Standards, as described at the website: [http://nces.ed.gov/statprog/2002/std4\\_2.asp](http://nces.ed.gov/statprog/2002/std4_2.asp).

~~109.~~—The NPSAS:12 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 E). 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. NPSAS:12 follows detailed 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.

110. 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.

111. 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 1/29/08. 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.

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

113. The 2011-12 National Postsecondary Student Aid Study is conducted under the authority of the Higher Education Opportunity 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.

114. 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).

115. Regarding file matching with administrative sources, the Family Educational Rights and Privacy Act (FERPA), (34 CFR Part 99) allows the disclosure of information without



prior consent for the purposes of NPSAS:12 according to the following excerpts: 99.31 asks “Under what conditions is prior consent not required to disclose information?” and explains that (a) “An educational agency or institution may disclose personally identifiable information from an education record of a student without the consent required by 99.30 if the disclosure meets one or more of the following conditions:

116. (6)(i) The disclosure is to organizations conducting studies for, or on behalf of, educational agencies or institutions to:

117. (A) Develop, validate, or administer predictive tests;

118. (B) Administer student aid programs; or

119. (C) Improve instruction.

120. In addition, 99.31 (a)(6)(iv) specifies: “For the purposes of paragraph (a)(6) of this section, the term *organization* includes, but is not limited to, Federal, State, and local agencies, and independent organizations.”

121. All three parts of 99.31(a)(6)(i) apply to NPSAS:12. The purpose of NPSAS:12 is to create a research data set for a large sample of students that brings together information about federal, state, and private aid programs, and gathers additional demographic and enrollment data to establish the appropriate context. The resultant data set allows research and policy analysts to address basic issues about the affordability of postsecondary education and the effectiveness of the existing financial aid programs. The data set can be used for, or on behalf of, educational agencies or institutions to accomplish activities (A), (B), and (C).

122. FERPA 99.31 (a) (6) further specifies that such disclosure may only occur if the study is conducted in a manner that does not permit personal identification of parents and students by individuals other than representatives of the organization; and the information is destroyed when no longer needed for the purposes for which the study was conducted.

123. Additionally, the study, including the administrative data linkage, qualifies for a 45 CFR 46 waiver of consent based on the following factors:

- There is minimal risk to the participants. There is no physical risk and only minimal risk associated with linkage of data to sample members. The public-use and restricted-use data, prepared as part of our contract, will not include SSNs, even though these numbers are used for the linkage. Data will undergo disclosure avoidance analysis and disclosure treatment steps to further reduce the risk.
- The waiver will not affect the rights and welfare of the subjects. The voluntary nature of the study is emphasized to sample members. Public-use and restricted-use data are only used for research purposes and lack direct individually-identifying information. The data are further protected through disclosure avoidance procedures approved by the NCES Disclosure Review Board.
- Whenever appropriate, subjects will be provided with additional pertinent information after they have participated. For each round of the study, information about prior rounds and the nature of the study is made available to sample members.
- The study cannot be conducted practicably without the waiver. To obtain written consent from sample members, multiple forms would have to be sent to the sample members

with multiple follow-up telephone and in-person visits. This process would add weeks to the data collection process and is not feasible from a time standpoint. Additionally, the value of these data would be jeopardized from a nonresponse bias perspective.

- The potential knowledge from the study is important enough to justify the waiver. These linked data for NPSAS:12 will provide invaluable data to researchers and education policy makers about the federal financial aid that students have received, as well as critical information concerning access to and persistence in postsecondary education. Rather than ask students for information about financial aid, we are getting it from the NSLDS, which is ED's system of recording federally aided student loans taken out by students and grants received. In our experience, students are generally not a very reliable source of information about the amounts or timing of grants and loans they have received. This administrative record data is accurate and much easier to obtain than by administering a questionnaire.

124. As part of initial sampling activities, we will ask participating institutions to provide SSNs for all students on their enrollment list. Having an initial list of all student SSNs minimizes the time and burden on both the institutions and the data collection agent. Institutions will only have to provide one enrollment list; if the SSNs were provided only for those students selected, the institutions would have to provide two separate enrollment lists. Immediately after the student sample is selected, the SSNs for non-selected students will be securely discarded.

125.

## 11. Sensitive Questions

126. The student interview collects information about earnings, assets, and marital and dependency statuses. Regulations governing the administration of these questions require (a) clear documentation of the need for such information as it relates to the primary purpose of the study, and (b) provisions to clearly inform sample members of the voluntary nature of participation in the study, as well as assurances that their responses will be treated confidentially.

127. Financial data related to earnings and assets, as well as marital and dependency status, are key items used in calculating need for financial aid, parental contributions, and financial aid awards. Consequently, the data elements are critical to the conduct of policy-related analyses and to the modeling and projection of the effects of federal program changes on students and on program costs. Several procedures have been implemented (see section A.10) to provide assurances to sample members about the voluntary nature of participation in the study as well as the confidentiality provisions for survey responses.

128. Accurately qualifying sample members as FTBs is a continuing challenge. Correctly classifying FTBs is important because unacceptably high rates of misclassification (i.e., false positives) can and have resulted in (1) excessive cohort loss with too few eligible sample members to sustain the longitudinal study, (2) excessive cost to "replenish" the sample with little value added, and (3) inefficient sample design (excessive oversampling of "potential" FTBs) to compensate for anticipated misclassification error. Early file matching activities, described in B.2.c, will be an essential step in accurately identifying BPS cohort members.

129. SSN will be needed to 1) conduct file matches to administrative records and 2) maintain the sample for the longitudinal study (BPS). 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**

130. Two data collection activities will take place: (1) student record collection from eligible institutions that provided enrollment lists; and (2) student interviews. The respective burden estimates for each data collection activity are provided in table 2.

131. **Table 2. Maximum estimated burden on respondents**

	132. Data collection activity	133. Sample size	134. Expected eligible students	137. Expected number of eligible respondents	138. Percent expected response rate of eligibles	139. Average time burden per respondent	140. Range of response times	141. Total burden (hours)
142.								
149. Student record collection *	150.1 , 6 9 2	143. 151. 152.1 , 6 7 2	144. 153.1, 41 6	145. 154. 85	146. 155.2 3 .6	147. 156.1 t o 4 0	148. 157.3 3 , 4 1 8	
158. Student interview	159.1 2 4 , 6 4 4	160. 161.1 1 8 , 7 4 8	162.83 ,1 24	163. 70	164.2 5 .5 m i n	165.1 5 t o 1 h r	166.3 5 , 3 2 8	

		169.				174.2	
		170.3				0	
		1					m
		,					i
		2					n
		4					
		9			173.2		t
	168.3				8		o
	2				.		1
	,				5		
167.	8		171.21		m		h
FTBs with	9		,8		i		r
CPS match	3		74	172.	n		175.
		178.				184.2	
		179.				0	
		180.1					m
		5					i
		,					n
		3					
		9					t
		2					o
	177.1				183.3		1
	6				0		
	,						h
176.	2		181.10		m		r
FTBs	0		,7		i		
without	2		74	182.	n		185.
CPS match							
		188.				193.1	
		189.5				0	
		6					t
		,					o
		7					
		6					4
	187.5	6			192.2		0
	9				4		
	,						m
	8		190.40		m		m
186. Other	1		,1		i		i
UGs	4		43	191.	n		n
							194.
		197.				202.8	
		198.1					t
		5					o
		,					
		3					3
	196.1	4			201.2		5
	5	1			0		
	,						m
	7		199.10		m		m
195. Gradu	3		,3		i		i
ates	5		33	200.	n		n
204.	205.	206.	207.	208.	209.	210.	203.
							211.
		214.					219.6
212. Total of							8
responding							,
institutions			215.84				7
and			,5				4
students	213.		40	216.	217.	218.	6

220.\* "Sample" is the number of institutions that provided enrollment lists for student sampling.

221. **Student record collection.** Based on results from the NPSAS:12 field test about 20 percent of schools are expected to provide programmer-created electronic data files to the contractor, resulting in an average estimated response burden of about 18 hours. Eighty percent are expected to enter some portion of the requested information themselves at 25 hours per response (on average). This distribution of responses results in an estimated average of nearly 24 hours per institution response for the full-scale study. The estimated burden for field test institutional data collection is lower (approximately 13 hours) due to the smaller sample size for each institution.
222. **Student interviews.** Although many of the data elements to be used in NPSAS:12 appeared in the previously approved NPSAS:04 and NPSAS:96 studies (the last NPSAS studies to include a BPS cohort), additional items will also be included in NPSAS:12. A facsimile of the student interview is presented in Appendix H. The field test interview took, on average, 36.2 minutes to complete. Based on field test results the interview has been shortened and considerably streamlined, resulting in a lower estimate of 25.5 minutes for completion of the full-scale interview. The burden estimate is a weighted mean taking into account the time expected in the interview for each student group. For the approximately 83 percent of FTBs who are federal aid applicants (based on field test results), we will be able to use preloaded information collected from the FAFSA, the federal financial aid application, that would otherwise have to be collected in the student interview, saving aid applicants about 1.5 minutes.
223. Table 3 presents estimated costs to respondents participating in the NPSAS:12 full-scale study.

224. **Table 3. Maximum estimated costs to respondents for the NPSAS:12 full-scale implementation**

225. Data collection activity	226. Sa	227. E	228. Expected number of responses	229. Percentage	230. Average age time burden per respondent	231. T	232. R	233. Tot
234. NPSAS:12 Full-scale Study	235.	236.	237.	238.	239.	240.	241.	242.
244. Student record collection *	245. 1,6	246. 1,62	247. 1,46	248. 85	249. 23.6 hours	250. 33	251. 1	252. 56
254. Student interview	255. 12	256. 18	257. 83	258. 70	259. 25.5 minutes	260. 35	261. 1	262. 56
264. Total of responding institutions and students	265.	266.	267. 454	268.	269.	270. 68	271.	272.

\* "Sample" is the number of institutions that provided enrollment lists for student sampling.



**13. Estimates of Cost**

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

**14. Costs to Federal Government**

275. A summary of estimated costs to the federal government for NPSAS:12, categorized by field test, full-scale study, and total costs is shown in table 4. 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.<sup>3</sup> A more detailed breakdown of contract costs is provided in table 5.

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

277. Costs to NCES	278. Amount
279. NPSAS:12 Field Test	280.
281. Salaries and expenses	282. \$62,370
283. Contract costs	284. 5,895,937
285. Total	286. 5,958,307
287.	288.
289. NPSAS:12 Full-scale Study	290.
291. Salaries and expenses	292. 197,739
293. Contract costs	294. 21,897,611
295. Total	296. 22,095,350
297.	298.
299. Total Costs	300.
301. Salaries and expenses	302. 260,109
303. Contract Costs	304. 27,793,548
305. Total	306. 28,053,657

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<sup>3</sup> This package requests clearance for full-scale student data collection. A previously submitted package requested clearance for full-scale institution contacting and enrollment list collection. Costs shown here are for the full study, including institution and student data collection efforts.

307. <b>Table 5. Contract costs for NPSAS:12</b>		309. Budgeted amount
308. Study area and task		
310.11		
0	311. Post award conference	312. \$40,891
313.12		
0	314. Schedules	315. 57,488
316.13		
0	317. Monthly reports	318. 803,152
319.14		
0	320. Integrated monitoring system	321. 587,665
322.15		
0	323. Technical review panels	324. 1,521,527
325		326
327. Field test (FT) data collection		328.
329.21		
1	330. Institution sampling	331. 173,953
332.21		
2	333. Institution contacting	334. 584,390
335.21		
3	336. Student sampling	337. 134,559
338.22		
0	339. FT RIMG/OMB forms clearance	340. 160,116
341.23		
1	342. Instrumentation	343. 1,571,218
344.23		
2	345. Tracing	346. 123,657
347.23		
3	348. Training for institution level data collection	349. 99,756
350.23		
4	351. Training for CATI data collection	352. 138,464
353.23		
5	354. Institution level data collection	355. 168,915
356.23		
6	357. Web/CATI data collection	358. 675,734
359.23		
7	360. Data processing	361. 716,487
362.24		
0	363. Methodology report	364. 157,591
365		366
367. Full-scale (FS) data collection		368.
369.31		
1	370. Institution sampling	371. 56,935
372.31		
2	373. Institution contacting	374. 950,674
375.31		
3	376. Student sampling	377. 545,454
378.32		
0	379. FS RIMG/OMB forms clearance	380. 109,159
381.33		
1	382. Instrumentation	383. 1,087,697
384.33		
2	385. Tracing	386. 1,391,671
387.33		
	388. Training for institution level data collection	389. 183,487

3		
390.33		
4	391. Training for CATI data collection	392. 589,646
393.33		
5	394. Institution level data collection	395. 602,650
396.33		
6	397. Web/CATI data collection—General	398. 7,840,060
399.	400. Web/CATI data collection—Incentives	401. 2,338,459
402.33		
7	403. Data processing	404. 1,602,292
405.33		
8	406. Weighting, imputations & nonresponse bias analysis	407. 617,271
408.33		
9	409. Data disclosure planning and prevention	410. 48,872
411.34		
0	412. Methodology report	413. 259,782
414	417. Descriptive reporting	418.
419.41		
0	420. First Look	421. 193,000
422.42		
0	423. Data analysis system	424. 364,102
425.43		
0	426. Additional special tabulations	427. 355,533
428.44		
0	429. Descriptive reports	430. 531,525
431.45		
0	432. Respond to information requests	433. 388,137
434.46		
0	435. Final technical memo	436. 21,579
437		438
440. Tot		
al	441.	442. 27,793,548

443. 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**

444. The apparent increase in the requested burden hours is due to the fact that the last approval was for full scale data collection from institutions only, while this request is for all of the full scale data collection from both, institutions and students.

445. Additionally, estimates for response burden and costs for the full-scale NPSAS:12 are based on experiences from the NPSAS:12 field test. In the NPSAS:12 student interview and records collection field test package submitted to OMB the estimated response burden for student records collection for full-scale was 22.2 hours per response. This estimate has been increased to 23.6 hours based on the field test experience. During the field test we learned that the majority of schools entered or edited at least some data themselves, and thus we have increased the burden estimate to 23.6 hours on average.

446. In the NPSAS:12 student instrument field test package submitted to OMB, the estimated average response burden for the full-scale student interview was 25.1 minutes. The revised estimate of 25.2 minutes is based on the field test experience and known revisions to the instrument since the field test. The change in burden is minimal.

447.

**16. Publication Plans and Time Schedule**

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

1. Statistics-In-Brief and Web Tables for online dissemination to a broad audience;
2. 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);
3. complete data files and documentation for research data users in the form of both a restricted-use electronic codebook (ECB) and a public-use data tools (i.e. QuickStats, PowerStats); and
4. special tabulations of issues of interest to the higher education community, as determined by NCES.

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

450. **Table 6. Operational schedule for NPSAS:12**

		452.	S	453.	En
451.	NPSAS:12 activity		tart date		d date
454.	Field test	455.		456.	
457.	Contacts with institutions to request enrollment lists	458.	O	459.	Fe
			ct. 5,		b. 7, 2011
		461.	J	462.	Apr
460.	Enrollment list collection		an. 24,		il 25, 2011
		464.	F	465.	Ma
463.	Select student sample		eb. 1,		y 13, 2011
		467.	M	468.	Jul
466.	Collect student data from institution records		ar. 28,		y 15, 2011
		470.	M	471.	Ju
469.	Self-administered web-based data collection		ar. 28,		n. 30, 2011
		473.	A	474.	Ju
472.	Conduct telephone interviews of students		pr. 28,		n. 30, 2011
		476.	J	477.	Au
475.	Process data, construct data files		an. 25,		g. 30, 2011
		479.	A	480.	Oct
478.	Prepare/update field test reports		pr. 4,		. 26, 2012
484.	Full-scale study	485.		486.	
487.	Contacts with institutions to request enrollment lists	488.	S	489.	Ju
			ept. 12,		n. 15, 2012
		491.	J	492.	Jul.
490.	Select student sample		an. 24,		16, 2012
		494.	J	495.	Se
493.	Collect student data from institutional records		an. 31,		pt. 28.
			2012		2012
496.	Self-administered web-based data collection	497.	F	498.	Se
			eb. 7,		pt. 28,
			2012		2012
499.	Conduct telephone interviews of students	500.	F	501.	Se
			eb. 28,		pt. 28,
			2012		2012
502.	Process data, construct data files	503.	N	504.	Ju
			ov. 3,		n. 17, 2013
		506.	A	507.	Se
505.	Prepare/update reports		ug. 24,		pt. 30,
			2012		2014

508. Note: The current request for OMB review includes only student data collection activities for the field test study.

**17. Approval to Not Display Expiration Date for OMB Approval**

509. 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**

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