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# Education Longitudinal Study: 2002 Third Follow-up (ELS:2002)

## Postsecondary Transcripts (ELS:2002 PETS) and Financial Aid Feasibility Study (ELS:2002 FAFS)

### OMB Supporting Statement Part A

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National Center for Education Statistics  
Institute of Education Sciences  
U.S. Department of Education

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## **PREFACE**

This submission requests clearance for the Education Longitudinal Study of 2002 (ELS:2002) Postsecondary Education Transcript Study (ELS:2002 PETS) and Financial Aid Feasibility Study (ELS:2002 FAFS). ELS:2002 is an ongoing longitudinal study conducted by the National Center for Education Statistics (NCES) that began with a nationally representative sample of sophomores in the spring of 2002. In 2012, ELS:2002 is entering its third follow-up collection. As part of this collection, NCES will conduct postsecondary transcript collection and financial aid feasibility study.

## **A. JUSTIFICATION OF THE STUDY**

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

#### ***A.1.a Purpose of This Submission***

The materials in this document support a request for clearance to conduct a postsecondary education transcript collection and financial aid student records feasibility study as part of the third follow-up of ELS:2002. Since the base year of data collection in 2002, the ELS:2002 set of studies has included the following basic components and design features:

#### ***Base Year, 2002***

- about 750 participating schools with approximately 17,600 eligible students (resulting in 15,300 base-year respondents); schools are first-stage unit of selection, with sophomores randomly selected within schools;
- oversampling of Asian Americans and private schools;
- assessments in reading and mathematics;
- surveys of parents, English and math teachers, media center specialists, and school administrators, plus a facilities checklist;
- test concordances with other assessment programs: Program for International Student Assessment (PISA), National Assessment for Educational Progress (NAEP), and test score reporting linkages to the prior longitudinal studies.

#### ***First Follow-up, 2004***

- student questionnaires, dropout questionnaires, in-school math assessments, and school administrator questionnaires;
- returned to the same schools, but separately followed transfer students and those no longer in school by telephone (computer-assisted telephone interview; CATI) or field (computer-assisted personal interview; CAPI);
- freshening for a nationally representative senior cohort; and
- high school transcript component in fall/winter, 2004–05.

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### ***Second Follow-up, 2006***

- follow-up interview with students using web-based self-administered, telephone (CATI), and field (CAPI) data collection modes;

### ***Third Follow-up, 2012***

- follow-up interview with students using web-based self-administered, telephone (CATI), and field (CAPI) data collection modes;
- collection of postsecondary transcripts (ELS:2002 PETS); and
- feasibility study of collection of financial aid records (ELS:2002 FAFS) from subsample of postsecondary institutions.

The ELS:2002 third follow-up study will provide data to map and understand the outcomes of the high school cohorts' transition to adult roles and statuses at about age 26. For the cohort as a whole, the third follow-up will obtain information that will permit researchers and policymakers to better understand issues of postsecondary persistence and attainment, as well as sub-baccalaureate and baccalaureate rates of economic and noneconomic return on investments in education. The third follow-up will also provide information about high school completion (for students who dropped out or were held back) and the status of high school dropouts, late completers, and students who have obtained an alternative credential, such as the GED. Finally, for both college-bound and non-college-bound students, the third follow-up will map their labor market activities and family formation.

For those cohort members who pursued postsecondary education, the ELS:2002 postsecondary transcript collection will provide detailed data on course-taking and enrollment patterns, majors and degree attainment, and academic progress. In addition to the ELS:2002 PETS, ELS:2002 will also evaluate the feasibility of collecting student financial aid records from postsecondary institutions attended by the sample over time. The results of the ELS:2002 FAFS will provide an indication of how successful such a collection might be for future studies, including the Beginning Postsecondary Students longitudinal study (BPS) and other future longitudinal studies (e.g., the High School Longitudinal Study of 2009, HSLs:2009).

#### ***A.1.b Legislative Authorization***

ELS:2002 is conducted by the National Center for Education Statistics (NCES) of the Institute of Education Sciences (IES), in close consultation with other offices and organizations within and outside the U.S. Department of Education (ED). RTI International is the primary data collection agent for this study under contract number ED-04-CO-0036/0004. ELS:2002 is authorized under Section 9543 of the Education Sciences Reform Act of 2002 (20 U.S.C.).

### **A.1.c Prior and Related Studies**

In 1970, NCES initiated a program of longitudinal high school studies. Its purpose was to gather time-series data on nationally representative samples of high school students that would be pertinent to the formulation and evaluation of education policies. Starting in 1972, with the National Longitudinal Study of the High School Class of 1972 (NLS:72), NCES began providing education policymakers and researchers with longitudinal data that linked education experiences with later outcomes, such as early labor market experiences and postsecondary education enrollment and attainment. Almost 10 years later, in 1980, the second in a series of NCES longitudinal surveys was launched, High School and Beyond (HS&B), which included one cohort of high school seniors comparable to the seniors in NLS:72 as well as a sophomore cohort. The third longitudinal study of students sponsored by NCES was the National Education Longitudinal Study of 1988 (NELS:88), a cohort of eighth-graders. All three of the completed secondary longitudinal studies (NLS:72, HS&B, and NELS:88) included a postsecondary education transcripts component. Note, however, that none included a comprehensive financial aid record collection such as will be implemented in ELS:2002. In 2009, the next study in the series was begun—the High School Longitudinal Study of 2009 (HSLs:09), which follows a cohort of fall 2009 ninth-graders. If the feasibility and quality of a financial aid student records data collection is confirmed by ELS:2002, other NCES studies such as HSLs:09 and the Beginning Postsecondary Longitudinal Study (BPS) may benefit.

### **A.2 Purposes and Use of the ELS:2002 PETS and ELS:2002 FAFS**

ELS:2002 is designed to monitor the transition of a national sample of young people as they progress from tenth grade through high school and onto postsecondary education and/or the world of work. ELS:2002 has collected data on young people in high school from multiple perspectives and follows them on many pathways. Because it draws on respondent survey information as well as administrative records such as transcripts, ELS:2002 is able to provide information on the many possible outcomes of secondary education.

Clearance is requested to collect college transcripts from the postsecondary institutions attended by those ELS:2002 sample members who have enrolled in postsecondary education since completing high school requirements, and financial aid student records from a subset of those institutions. The two data sources will address a range of new issues concerning students' enrollment and course taking patterns, progress and attainment in postsecondary education, and the types, sources, and amounts of student aid received across years of attendance.

Postsecondary Transcript Collection. As an official institution record, the postsecondary transcript is a more reliable source of academic performance than is a student's self-report. The transcript collection

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for ELS:2002, which will be designed like that conducted for BPS:04/09, will provide much-needed information on the course of study of today’s college students as they begin, leave, and re-enter postsecondary study, transfer between institutions, and complete programs at all levels of institutions. The combination of transcripts and other study data collected through interviews, file matching, and record abstraction will afford researchers the opportunity to summarize the undergraduate and graduate paths taken by ELS:2002 cohort members and provide them with an important link between academic performance and outcomes.

Financial Aid Feasibility Study. Although concurrent or contemporaneous collections of similar data have been successful for the purpose of determining how students pay for their postsecondary education (e.g., for NPSAS), the ELS:2002 FAFS will serve as a feasibility study for collecting the data retrospectively, with records that go back as far as 2004. That is, for the feasibility study, institutions will be asked to provide a borrowing history for the entire tenure of the identified ELS:2002 students who attended their institution. The results of the feasibility study will help provide information about the quality of the data when collecting financial aid student records that span a number of years and ultimately inform decisions on such efforts for future longitudinal studies. Longitudinal analysis of student financial aid records would allow examination of borrowing and debt trends over time, as well as the effects of those trends on postsecondary persistence and attainment, and decisions about work and family.

### ***A.2.a Content Justifications: Postsecondary Transcripts and Financial Aid Feasibility Study***

The data elements list for both the ELS:2002 PETS and the ELS:2002 FAFS can be found in Appendix 1 and 2 respectively. Content for both data collections is based on prior studies, particularly the 2009 Postsecondary Education Transcript Study (BPS PETS:09) and the 2011-12 National Postsecondary Student Aid Study (NPSAS:12). Potential research topics are discussed below.

#### **Postsecondary Transcripts**

Researchers have found, in analyses of HS&B and NELS:88 PETS (e.g., Adelman 2006<sup>1</sup>), that “academic intensity of the student’s high school curriculum” counts importantly in providing momentum toward completing a bachelor’s degree. Transcripts provide unique, empirical data on student course-taking, performance, transfer, academic momentum and intensity, fields of study, and degree outcomes. Combined with student interview and high school transcript data, postsecondary transcript data can create a rich analytic resource for the study of postsecondary education.

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<sup>1</sup> Adelman, C. (2006). *The Toolbox Revisited: Paths to Degree Completion from High School Through College*” Washington, DC: US Department of Education.

The ELS:2002 PETS is the fifth in a series of postsecondary education transcript studies of high school cohorts; the first (NLS:72) took place in 1984, and was followed by HS&B sophomore cohort (1993), HS&B senior cohort (1986), and NELS:88 (2000). Postsecondary education transcript studies have also been undertaken in connection with BPS and Baccalaureate and Beyond (B&B). A fundamental difference between these studies is that BPS and B&B are grounded in a nationally-representative sample of postsecondary institutions (NPSAS) while the high school studies are based on a grade cohort-based secondary school sample. In addition, BPS captures all students entering postsecondary education—the high school studies miss late entrants. Likewise, B&B is representative of baccalaureate recipients, while studies such as ELS:2002 (which lacks both late entrants and late completers) are not.

While ELS:2002 and its sister secondary school studies cannot produce national estimates of postsecondary transfers or address the outcomes of late entrants, their link to high school data enables them to obtain rich information on the antecedents and pathways of individuals completing entering postsecondary education fairly promptly after high school, and those earning a bachelor's degree by their mid-20s.

Some research topics that can be addressed with transcript data include:

- Academic preparation – As a longitudinal study, ELS:2002 is uniquely positioned to provide data on secondary school preparation and postsecondary outcomes. The combined interview and high school transcript data offer insight on the academic preparation of students, including the courses they took and their performance. Postsecondary transcripts will add data on subsequent course-taking and performance, creating opportunities to study the student academic experience over time.
- Transfer – By collecting transcripts from all postsecondary institutions sample members are known to have attended, the study enables analysis of the movement of students and credits between institutions. Example research questions include: How prevalent is student transfer between institutions, including co-enrollment, and how are credits transferred between institutions? How does transfer impact student outcomes?
- Course-taking – Analysis of transcripts across the student sample can provide insights on postsecondary education offerings and student course taking. Frequencies of courses in particular topic areas can be examined, such as STEM or advanced math, occupational or remedial courses. Course-taking data can be combined with data on student program type, level (e.g. freshman), degree attainment, school sector, and a variety of other variables to gain insight on how course-taking varies across student and institution types. Additional course data, such as credits earned or attempted and grade point averages in selected topic areas, can give further insights on performance and progress of the study population. Example research questions include: How does course taking vary for students at public, private non-profit and private for-profit institutions, at 4-



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year, 2-year, and less-than-2-year institutions? How does course-taking influence persistence and other student outcomes?

- Academic performance - Transcripts provide more detailed data on academic performance than can be collected from any other source. Grade data from transcripts can be used to examine performance in specific subject areas or in selected time periods (e.g. 1<sup>st</sup> year students). Grade data can be combined with degree attainment, stop-out, transfer, or interview data such as employment and income to create a more detailed picture of how academic performance relates to progress and student outcomes.
- Credit accumulation – Similar to academic performance, transcripts provide a unique opportunity to analyze student credit accumulation. Credit accumulation can be measured across institutions and across time, enabling analysis of concepts such as enrollment intensity (i.e. full-time or part-time enrollment) and time to degree. How much does part-time enrollment delay degree completion, and does it decrease the likelihood of earning a degree? Transcript data provide an additional dimension to the analysis of time to degree and persistence, introducing the added detail of how credits were earned during the time a student was enrolled.
- “Events” – Transcripts provide empirical evidence of events in postsecondary enrollment such as stop-outs, transfers, summer or dual enrollment periods, and other phenomenon that are difficult to capture or measure solely with self-reported data. Patterns of attendance, such as swirling or moving from 2-year to 4-year institutions can also be analyzed.

### **Financial Aid Feasibility Study**

As stated above, the content of the ELS:2002 FAFS is extracted from the set of financial aid data elements developed for NPSAS. While there is no intention of exploring specific financial aid research topics based on the feasibility study data collected as part of the ELS:2002 third follow-up, the data will be analyzed for the purpose of assessing the ability to collect financial aid student records from postsecondary institutions. Specifically the data provided for the feasibility study should indicate what elements institutions are able to provide retrospectively and the number of years for which they can provide those data. The quality and completeness of the data will be reviewed and results will be used to design student records data collection efforts in future longitudinal studies. More detail pertaining to item justification can be found in Appendixes 1 and 2.

### **A.3 Improved Information Technology**

Wherever possible, improved information technology will be used to ensure the most accurate, high quality, and least burdensome institution data collection. For example, the postsecondary transcript collection is divided into three phases. During the first phase, a subset of the institutions will be contacted for the transcript collection. Operations during this phase will inform and help refine operations for the subsequent phases. After refining postsecondary transcript collection procedures as applicable, the

remaining institutions will be contacted regarding transcripts for all eligible study members. The financial aid student records collection will be part of this first phase of postsecondary transcript collection. Institutions will receive an announcement regarding the postsecondary transcript collection and financial aid student records study in which institution staff will be invited to access the ELS:2002 institution website where they will find information on the purposes of the ELS:2002 PETS and ELS:2002 FAFS collections, along with forms and instructions, FAQs, endorsements, legal authority, and how to contact project staff. The website will be made available to institution staff for all data collection tasks required for the postsecondary transcript collection and, when applicable, the student financial aid records study. To access restricted pages containing confidential information, the user will be required to log in by entering an assigned ID number and password. Once each task is completed, institution staff will no longer be able to access it, but a status screen will indicate which stages of data collection have been completed.

### **A.3.a Postsecondary Transcripts: ELS:2002 PETS**

Information technology will be employed in the collection of postsecondary transcripts and course catalogs from the institutions attended by ELS:2002 sample members. As a first step, RTI will collect course catalogs for and postsecondary transcripts from institutions where ELS:2002 cohort members were enrolled. College Source Online will be the initial source of catalogs. Any institutions whose catalogs cannot be obtained in that manner will be asked to provide the course catalogs directly to RTI via the means of their choice, such as email, postal mail, or other methods. Postsecondary transcripts will be requested for the ELS:2002 full-scale cohort from all institutions known to have been attended by the sample member since high school. The PETS collection will be divided into three phases. The first phase comprises a sample of institutions reported by ELS:2002 third follow-up sample members. This phase will coincide with the separate FAFS collection. The second phase of the PETS will involve all eligible institutions reported by ELS:2002 third follow-up sample members that were not part of the first phase. The third and final phase of PETS involves reviewing postsecondary transcripts collected during phases one and two, identifying new student-institution linkages, and following up with the new institutions so identified.

Several methods will be used for obtaining the postsecondary transcript data to accommodate the institutions providing transcripts. Methods include:

- Uploading electronic transcripts to a secure ELS:2002 study website;
- Sending transcripts by secure fax, using a process that converts faxed data to electronic files upon receipt, so that no paper fax is received, thereby increasing data security.
- Sending electronic transcripts by secure File Transfer Protocol;
- Sending electronic transcripts via e-mail as encrypted attachments;

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- Obtaining transcripts directly using a dedicated server at the University of Texas at Austin (described in more detail below) for those institutions participating in the program.

The fifth collection method listed above is a relatively new process. Participating institutions can send and receive academic transcripts in standardized electronic formats via a dedicated server at the University of Texas at Austin. The server supports Electronic Data Interchange (EDI) and XML formats.

A keying and coding system (KCS) will be used for data entry of the transcripts received. The KCS application, developed by RTI, includes data entry fields corresponding to the key data elements to be collected from transcripts. Following quality control and data cleaning processes, data collected from transcripts are assembled into data files for subsequent analysis.

#### **A.3.b. Financial Aid Feasibility Study: ELS:2002 FAFS**

To ensure the efficiency, quality, and ease of the financial aid student records study, ELS:2002 FAFS will use a web-based application. Similar to what is currently being used on NPSAS:12, multiple options will be offered to an institution for providing student data, including: (1) uploading electronic (.csv) files 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; and (3) use of a web-based data entry interface. This web-based interface was recently redesigned to allow users to enter data in the manner most convenient for them.

An online video tutorial will be available to show users exactly how to navigate through the application and help screens will provide users with more in-depth explanations of the required items. The web-based application will allow error checking to be performed immediately by institution staff. An important feature of the online application is that different institution staff can complete portions of the required data entry and can complete the data entry in multiple sessions. These features reduce user burden while ensuring that the most accurate data are collected.

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

In addition to postsecondary transcript collection for the NCES secondary longitudinal studies, postsecondary transcripts are also collected in the postsecondary longitudinal studies, specifically, in BPS and B&B. Although the same course coding scheme and methods are used in the secondary and postsecondary longitudinal studies, the analytic populations and generalizability of the data are importantly different. ELS:2002 is representative of two high school cohorts (tenth and twelfth grades) followed to about age 26. BPS, however, is fully representative of beginning postsecondary students, including late entrants into the system. In contrast, B&B represents baccalaureate attainees, regardless of

age at entry or number of years to degree. Because of these sample and analytic differences, there is no duplication in these data collections. Likewise, while the NPSAS suite of studies is well-positioned to collect financial aid records, these also reflect a different sample basis and are therefore not duplicative.

#### **A.5 Methods Used to Minimize Burden on Small Businesses**

Some small for-profit schools and other small public and private schools will be contacted as part of the ELS:2002 PETS and ELS:2002 FAFS. Burden will be minimized on these schools by working closely with a school-appointed coordinator (e.g., the registrar) before the data collection effort to identify the format in which records are kept and transmitted. Course catalogs will be collected from a public online resource, as available, to further minimize burden. To accommodate any constraints imposed by record-keeping systems, schools will be offered alternative methods of providing the requested transcripts and financial aid student records as described above in the Information Technology section.

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

The secondary longitudinal studies have pursued postsecondary education transcripts as the culminating collection of the study. This is the most practical timing, in that postsecondary institutional attendance must first be recorded in the administered questionnaire, and is ideal for combining records and questionnaire data in analysis.

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

All data collection guidelines in 5 CFR 1320.5 are being followed. No special circumstances of data collection are anticipated.

#### **A.8 Consultants Outside the Agency**

In recognition of the significance of ELS:2002, several strategies have been incorporated into the project's work plan that allow for the critical review and acquisition of comments regarding project activities, interim and final products, and projected and actual outcomes. These strategies include consultations with persons and organizations both internal and external to the National Center for Education Statistics, the U.S. Department of Education, and the federal government.

ELS:2002 project staff have established a Technical Review Panel (TRP) to review study plans and procedures. The third follow-up TRP includes some of the earlier ELS:2002 panelists for continuity with prior phases of the study. However, the membership has been reconstituted to reflect the shift in focus from high school experiences to postsecondary and labor market transitions that mark the final outcomes of the study. See Exhibit A-1 for a list of the TRP membership and their affiliations. The TRP

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met in October of 2010 and in November of 2011, and its recommendations, based on field test results presented at the November 2011 session, have been taken into consideration in revising the instrument for the full-scale study.

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**Exhibit A-1. Third Follow-up Technical Review Panel (Research and Policy Community Members)**

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

Schools will be reimbursed for the cost of preparing and sending transcripts at the school's standard rate. If additional costs are incurred by the schools, RTI will reimburse such expenses to the extent that they are reasonable and properly documented. Based on a similar postsecondary transcript collection conducted in 2009 (BPS:04/09 PETS), we estimate that approximately 30 institutions will

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request and receive reimbursement for expenses for approximately 150 transcripts at an average cost of \$8 per transcript, and an average reimbursement of \$40 for those institutions

#### **A.10 Assurance of Confidentiality**

A data security plan (DSP) was developed and approved by the computer security review board for the ELS:2002 third follow-up. Both the postsecondary transcripts and financial aid student records data collections will adhere to the guidelines outlined in the existing plan. The ELS:2002 DSP represents best-practice survey systems and procedures for protecting respondent confidentiality and securing survey data. An outline of this plan is provided in Exhibit A-2. The ELS:2002 DSP:

- establishes clear responsibility and accountability for data security and the protection of respondent confidentiality with corporate oversight to ensure adequate investment of resources;
- details a structured approach for considering and addressing risk at each step in the survey process and establish mechanisms for monitoring performance and adapting to new security concerns;
- includes technological and procedural solutions that mitigate risk and emphasize the necessary training to capitalize on these approaches; and
- is supported by the implementation of data security controls recommended by the National Institute of Standards and Technology for protecting federal information systems.

**Exhibit A-2. ELS:2002 Third Follow-up Data Security Plan Outline**


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ELS:2002 Data Security Plan Summary	Physical Environment Protections
Maintaining the Data Security Plan	System Access Controls
Information Collection Request	Survey Data Collection/Management Procedures
Our Promise to Secure Data and Protect Confidentiality	Protecting Electronic Media
Personally Identifying Information That We Collect and/or Manage	Encryption
Institutional Review Board Human Subject Protection Requirements	Data Transmission
Process for Addressing Survey Participant Concerns	Storage/Archival/Destruction
Computing System Summary	Protecting Hard-Copy Media
General Description of the RTI Networks	Internal Hard-Copy Communications
General Description of the Data Management, Data Collection, and Data Processing Systems	External Communications to Respondents
Integrated Monitoring System	Handling of Mail Returns, Hard-Copy Student Lists, and Parental Consent Forms
Receipt Control System	Handling and Transfer of Data Collection Materials
Instrument Development and Documentation System	Tracing Operations
Data Collection System	Software Security Controls
Document Archive and Data Library	Data File Development: Disclosure Avoidance Plan
Employee-Level Controls	Data Security Monitoring
Security Clearance Procedures	Survey Protocol Monitoring
Nondisclosure Affidavit Collection and Storage	System/Data Access Monitoring
Security Awareness Training	Protocol for Reporting Potential Breaches of Confidentiality
Staff Termination/Transfer Procedures	Specific Procedures for Field Staff
Subcontractor Procedures	

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Under this plan, the ELS:2002 PETS and ELS:2002 FAFS will conform fully to federal privacy legislation, including the Privacy Act of 1974 (5 U.S.C. 552a) and Section 9543 of Education Sciences Reform Act of 2002 (20 U.S.C.), and to the NCES *Restricted Use Data Procedures Manual* and NCES *Standards and Policies*. The plan for maintaining confidentiality includes obtaining signed confidentiality agreements and notarized nondisclosure affidavits from all personnel who will have access to individual identifiers. Each individual working on the postsecondary transcripts or the financial aid student records data collections will also complete the e-QIP clearance process. The plan includes annual personnel training regarding the meaning of confidentiality and the procedures associated with maintaining confidentiality, particularly as it relates to handling requests for information and providing assurance to respondents about the protection of their responses. The training will also cover controlled and protected access to computer files, built-in safeguards concerning status monitoring and receipt control systems, and a secured and operator-manned in-house computing facility.

Study notification materials sent to institutions will describe the voluntary nature of the ELS:2002 PETS and ELS:2002 FAFS and convey the extent to which study member identifiers and responses will be kept confidential. Contacting materials are presented in appendix 2. The following confidentiality



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language will be provided in the study brochure (for the full brochure see appendix 1) that is supplied to all institutions:

The Education Longitudinal Study of 2002 is being conducted under the authority of the Education Sciences Reform Act of 2002 (ESRA) (20 U.S.C. § 9543). Under ESRA, NCES, within the U.S. Department of Education's Institute of Education Sciences, is authorized 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** and adheres to the guidelines issued by the Office of Management and Budget in the *Federal Statistical Confidentiality Order of 1997* for ensuring the privacy and confidentiality of data collected for statistical purposes.

All responses that relate to or describe identifiable characteristics of individuals 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)).

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 ELS:2002 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:

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

- (A) Develop, validate, or administer predictive tests;
- (B) Administer student aid programs; or
- (C) Improve instruction.

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."

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.

### **A.11 Sensitive Questions**

There is no survey of sample members included in this data collection.

## A.12 Estimates of Hour Burden for Information Collection for the Pilot and Full-scale Study

Two data collection activities will take place: ELS:2002 PETS) and ELS:2002 FAFS. The PETS component will be implemented in three phases. In phase 1 a subset of the institutions will be contacted for the transcript collection (the phases are described above in section A.3.a). These same institutions, as applicable, will take part in the financial aid student records feasibility study, which happens to coincide with the PETS phase 1. Then, after refining transcript collection procedures as applicable, the remaining institutions will be contacted to provide postsecondary transcripts. The burden estimates for each data collection activity are provided in Exhibit A-3 and the cost estimates in Exhibit A-4 and A-5.

### Exhibit A-3. Estimated burden on institutions for ELS:2002 FAFS and PETS

	Anticipated # of institutions	Estimated # of participating institutions	Average time burden per response <sup>1</sup>	Range of response times	Total time burden (hours)
Financial Aid Feasibility Study	359	300	3.3 hrs	0.8 to 6.7 hrs	990
Postsecondary Transcript collection Phase 1	359	300	0.5 hrs	0.5 to 5 hrs	150
Combined burden			3.8 hrs		1,140
Phase 2 and 3 Transcript collection	2,827	2,484	0.5 hrs	0.5 to 5 hrs	1,242

<sup>1</sup> Time is specified by institution not by student.

NOTE: ELS:2002= Education Longitudinal Study of 2002 Third Follow-up.

**Transcript collection.** The response time for participating institutions is expected to vary depending on the number of sampled students who attend the institution and the method selected for transmitting the transcripts. Institutions will be offered five different methods for providing responses including uploading data to the secure study website and sending data to a secure electronic fax server (section B.3 includes a description of each method; fax transmittal sheets may be found in appendix 1). It is expected that some of the transcripts collected will indicate enrollment at additional institutions. RTI will collect transcripts from any additional institutions identified in the review of transcripts.

**Financial Aid Feasibility Study collection.** There are four methods of data collection available for providing student records data, two involve keying directly into a Web application and two involve preparing data and then uploading it to the website (section B.3 includes a description of each method). The estimated average is approximately 3.3 hours per institution response for the feasibility study.

## A.13 Estimates of Costs

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

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#### Exhibit A-4. Estimated costs to institutions for the ELS:2002 PETS

Data collection activity	Expected number of transcripts	Number of institutions	Average transcripts per school	Rate per transcript	Average cost per school	Total cost
Phase 1 Transcript collection	1,500	300	5	\$5	\$25	7,500
Phase 2 & 3 Transcript collection	10,737	2,484	5	\$5	\$25	53,685

#### Exhibit A-5. Estimated costs to institutions for the ELS:2002 FAFS

Data collection activity	Number of institutions	Expected number of respondents	Average time burden per response	Total time burden (hours)	Rate per hour	Total cost
Student records collection	359	300	3.3 hrs	990	\$17	16,830

#### A.14 Costs to Federal Government

Estimated costs to the federal government for the ELS:2002 postsecondary transcripts and student financial aid records data collections are shown in Exhibit A-6. 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.

#### Exhibit A-6. Total Costs to NCES

Costs to NCES	Amount (in \$)
<b>Total ELS:2002 costs</b>	<b>\$4,324,492</b>
Salaries and expenses	\$80,000
Contract costs	\$4,244,492

NOTE: All costs quoted are exclusive of award fee.

#### A.15 Reasons for Changes in Response Burden and Costs

The change associated with this submission is the shift from student data collection to the collection of postsecondary transcripts and financial aid student records from institutions to occur after student interviews have been completed.

#### A.16 Publication Plans and Time Schedule

The ELS:2002 contract requires the following reports and other public information releases for transcripts and financial aid student records:

- a report summarizing the findings of the financial aid student records feasibility study

- a report summarizing the results of the transcript pilot test
- complete restricted-use and public-use transcript data files
- documentation for research data users in the form of a Transcripts User Manual
- a Transcript First Look Report, presenting initial descriptive findings for dissemination to a broad audience.

Final deliverables for the transcript study are scheduled for completion in early 2015. The operational schedule for the ELS:2002 third follow-up feasibility study and full-scale study is presented in Exhibit A-7.

**Exhibit A.7 Operational schedule for ELS:2002 transcript collection and financial aid feasibility study collection**

Activity	Start date	End date
Collect and code student transcripts (PETS)		
Phase 1	1/29/2013	5/30/2013
Phase 2 and 3	8/15/2013	3/14/2014
Collect student financial aid records (FAFS)		
Feasibility study (concurrent with Phase 1 of Transcript study)	1/29/2013	5/30/2013

**A.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 requirement is requested.

**A.18 Exception to Certification for Paperwork Reduction Act Submissions**

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