

2015-16 NATIONAL POSTSECONDARY STUDENT AID STUDY (NPSAS:16)

Field Test Institution Contacting
and Enrollment List Collection

Supporting Statement Part A

(OMB # 1850-0666 v.12)

Submitted by
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Contents

A. Justification.....	5
1. Circumstances Making Collection of Information Necessary.....	5
a. Purpose of this Submission.....	5
b. Legislative Authorization.....	6
c. Prior NPSAS Studies.....	6
d. Prior and Related Studies.....	7
2. Purposes and Uses of the Data.....	7
a. NPSAS:16 Purposes.....	7
b. NPSAS:16 Research and Policy Issues.....	8
3. Use of Information Technology.....	10
4. Efforts to Identify Duplication.....	10
5. Method Used to Minimize Burden on Small Businesses.....	10
6. Frequency of Data Collection.....	11
7. Special Circumstances of Data Collection.....	11
8. Consultants Outside the Agency.....	11
9. Provision of Payments or Gifts to Respondents.....	11
10. Assurance of Confidentiality.....	12
11. Sensitive Questions.....	14
12. Estimates of Response Burden.....	15
13. Estimates of Cost.....	15
14. Costs to Federal Government.....	15
15. Reasons for Changes in Response Burden and Costs.....	17
16. Publication Plans and Time Schedule.....	17
17. Approval to Not Display Expiration Date for OMB Approval.....	17
18. Exceptions to Certification for Paperwork Reduction Act Submissions.....	17

B. Collection of Information Employing Statistical Methods

C. Information Collected on Enrollment Lists

D. References

Appendixes

- A. Previous Studies Based on NPSAS, B&B, and BPS Data
- B. Technical Review Panel (TRP) Members
- C. Confidentiality Agreement
- D. Respondent Communication Materials – Letters
- E. Respondent Communication Materials – Phone Script
- F. Anticipated Endorsing Associations for NPSAS:16

Tables	Page
1. Chronology of NPSAS and its longitudinal components.....	7
2. Maximum estimated burden on institutions for the NPSAS:16 field test enrollment list collection.....	15
3. Individual and total costs to NCES for the NPSAS:16 field test and full-scale implementations.....	15
4. Contract costs for NPSAS:16.....	16
5. Operational schedule for NPSAS:16.....	17

A. Justification

1. Circumstances Making Collection of Information Necessary

a. Purpose of this Submission

This document supports the clearance of selected materials and procedures for institution sampling and contacting, and enrollment list collection for the field test of the 2015-16 National Postsecondary Student Aid Study (NPSAS:16). A separate request for review pertaining to the student record data abstraction and student interview will be submitted in the fall of 2014. This study is being conducted by the National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES), part of the U.S. Department of Education. The primary contractor for this study is RTI International (Contract# ED-IES-13-C-0070), and subcontractors include Coffey Consulting; Hermes; HR Directions; Kforce Government Solutions, Inc.; Research Support Services; Shugoll Research; and Strategic Communications, Inc. Consultants are Dr. Sandy Baum and Ms. Alisa Cunningham.

This submission requests reinstatement of the previously obtained clearance for the 2011-12 cycle of NPSAS (OMB No. 1850-0666 v.8-11). This submission covers NPSAS:16 field test materials and procedures related to institution sampling, institution contacting, enrollment list collection, and enrollment list sampling. In late 2014, NCES will submit a separate clearance package for the NPSAS:16 field test student data collection. Following the field test study in 2015, NCES will provide the Office of Management and Budget (OMB) with a memorandum summarizing any changes planned for the full-scale data collection, and revised OMB packages for the two components of NPSAS - the institution and the student data collections. The materials that will be used in the 2015-16 full scale study will be based upon the field test materials included in this and the upcoming student data collection submissions. Additionally, both submissions are designed to adequately justify the need for and overall practical utility of the full study and to present the overarching plan for all of the phases of the data collection, providing as much detail about the measures to be used as is available at the time of this submission. As part of this submission, NCES is publishing a notice in the Federal Register allowing first a 60- and then a 30-day public comment period. For the final proposal for the full study institution data collection, after the field test, NCES will publish a notice in the Federal Register allowing an additional 30-day public comment period on the final details of the 2015-16 full scale study. The same process will be used for the student data collection part of NPSAS:16 field test and full scale collection.

NPSAS:16 is a nationally representative study of how students and their families finance education beyond high school. NPSAS was first implemented by NCES during the 1986-87 academic year to meet the need for national-level data about significant financial aid issues. Since 1987, NPSAS has been fielded every 3 to 4 years, most recently during the 2011-12 academic year. This submission is for the ninth cycle in the series that will be conducted during the 2015-16 academic year. NPSAS:16 also will serve as the base year data collection for the 2016 Baccalaureate and Beyond Longitudinal Study (B&B), a study of college graduates one year (B&B:16/17), four years (B&B:16/20), and ten years (B&B:16/26) following completion of the bachelor's degree. Subsets of questions in the student interview will focus on describing aspects of the experience of B&B-eligible students in their

last year of postsecondary education, including student debt, entry to graduate school, and the transition to employment and career.

This submission includes:

- A list of previous studies related to or based on data from NPSAS or its longitudinal spin-offs (Appendix A);
- A membership list of the Technical Review Panel (TRP) for the institution data collection component of NPSAS:16 (Appendix B);
- The Confidentiality Agreement completed by all project staff having access to individually identifiable data (Appendix C);
- Introductory letters to institutions and students selected for participation in the NPSAS:16 study (Appendix D);
- The script used by institutional contactors to verify eligibility and confirm contact information with sampled institutions (Appendix E); and
- A list of anticipated endorsing institutions and associations supporting NPSAS:16 (Appendix F).

b. Legislative Authorization

NPSAS:16 is conducted by NCES in close consultation with other U.S. Department of Education offices, federal agencies, and organizations. NPSAS is authorized under the Education Sciences Reform Act (ESRA) of 2002 (20 U.S.C. § 9512) and the Higher Education Opportunity Act (HEOA) of 2008, 20 U.S.C. § 1015:

(A)(k) Student aid recipient survey

- (1) Survey required: The Secretary, acting through the Commissioner for Education Statistics, shall conduct, on a State-by-State basis, a survey of recipients of Federal student financial aid under Title IV—
 - (A) to identify the population of students receiving such Federal student financial aid;
 - (B) to describe the income distribution and other socioeconomic characteristics of recipients of such Federal student financial aid;
 - (C) to describe the combinations of aid from Federal, State, and private sources received by such recipients from all income categories;
 - (D) to describe the—
 - (i) debt burden of such loan recipients, and their capacity to repay their education debts; and
 - (ii) the impact of such debt burden on the recipients' course of study and post-graduation plans;
 - (E) to describe the impact of the cost of attendance of postsecondary education in the determination by students of what institution of higher education to attend; and
 - (F) to describe how the costs of textbooks and other instructional materials affect the costs of postsecondary education for students.
- (2) Frequency: The survey shall be conducted on a regular cycle and not less often than once every four years.
- (3) Survey design: The survey shall be representative of students from all types of institutions, including full-time and part-time students, undergraduate, graduate, and professional students, and current and former students.
- (4) Dissemination: The Commissioner for Education Statistics shall disseminate to the public, in printed and electronic form, the information resulting from the survey.

c. Prior NPSAS Studies

As noted above, NPSAS:16 will be the ninth NPSAS in a series dating back to 1986–87. The first in the series, 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. In NPSAS:87 and NPSAS:12, institutions in Puerto Rico were not sampled. Additional detailed information about each of the prior NPSAS studies and related longitudinal studies conducted by NCES can be found at <http://nces.ed.gov/surveys/npsas/>.

Since its inception, the data collection techniques, sources, and sampling and weighting methods used for NPSAS have evolved to meet new demands for more precise and detailed information to inform postsecondary student financial aid policy. Following NPSAS:87, which combined paper-based surveys of 40,000 students and a subset of their parents with institutional records, NPSAS:90 introduced computer-assisted telephone interviewing and incorporated data from the federal Pell Grant payment file. NPSAS:93 enabled institutions to enter student records electronically, and NPSAS:96 added as data sources the Central Processing System for federal financial aid applications, the National Student Loan Data System, and SAT and ACT student test scores. NPSAS:2000 dropped the parent interview and expanded the sample size to 60,000 students. NPSAS:04 introduced a self-administered web-based student interview option, further increased the sample size to 110,000 students, and for the first time oversampled undergraduate students in 12 states to permit state-representative estimates for those states. NPSAS:08 retained state-representative oversamples for six states, enlarged the sample size to 130,000 students, and added the National Student Clearinghouse (NSC) as an administrative data source. NPSAS:12, in response to the growing for-profit sector and to ensure reliable estimates at all institution levels, dropped the state-representative samples, but added separate sampling for all levels of the for-profit sector: less-than-2-year, 2-year, and 4-year institution. In addition, NPSAS:12 was the first cycle to use current-year 12-month institutional enrollment data to ensure more accurate poststratification (weighting) than using prior-year enrollment data.

d. Prior and Related Studies

Two longitudinal studies conducted within the Sample Surveys Division of NCES were designed to address a variety of issues regarding higher education. Based on samples of students attending postsecondary education in a particular year regardless of age, each of these studies incorporates base year data from the cross-sectional NPSAS and extends it through longitudinal follow-up components focusing on first-time students and on recent college graduates in alternate NPSAS survey years: Beginning Postsecondary Students (BPS) and Baccalaureate and Beyond (B&B). The chronology of the previous administrations of the NPSAS study and its associated longitudinal components is presented in table 1.

Table 1. Chronology of NPSAS and its longitudinal components

Base year	First follow-up	Second follow-up	Third follow-up
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NPSAS:90	BPS:90/92	BPS:90/94	—
NPSAS:93	B&B:93/94	B&B:93/97	B&B:93/03
NPSAS:96	BPS:96/98	BPS:96/01	—
NPSAS:2000	B&B:2000/01	—	—
NPSAS:04	BPS:04/06	BPS:04/09	—
NPSAS:08	B&B:08/09	B&B:08/12	—
NPSAS:12	BPS:12/14	BPS:12/17	—
NPSAS:16	B&B:16/17	B&B:16/20 (anticipated)	—

— Not applicable.

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

The seven major issues addressed in these Sample Surveys Division studies are:

1. Undergraduate access/choice of institution;
2. Persistence;
3. Progress/curriculum;
4. Attainment/outcome assessment;
5. Financial aid and student debt;
6. Access to graduate programs; and
7. Benefits of postsecondary education to individuals and society.

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

2. Purposes and Uses of the Data

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

a. NPSAS:16 Purposes

The fundamental purpose of NPSAS is to create a research data set that brings together information about a variety of programs for a large sample of undergraduate and graduate students. NPSAS provides the data for comprehensive descriptions of the undergraduate and graduate student populations in terms of their demographic characteristics, academic programs, types of institutions attended, attendance patterns, and employment. Demographic and enrollment data establish the appropriate context that allows researchers and policy analysts to address basic issues about postsecondary affordability and the recipients of student financial assistance. These results are presented in two First Look reports and four Web Tables publications: an overview of student aid by institutional sector, a profile of undergraduates, a detailed description of undergraduate financing, and a profile of graduate students and the financing of their education beyond the bachelor's degree. In addition, an undergraduate financing report describes the total price of attendance for undergraduates (tuition and fees plus non-tuition expenses), the net price after grant aid, and the "out-of-pocket" net price (after all aid, including loans). The data can be used to calculate statistics with PowerStats and QuickStats, two web-based software applications available to the public at <http://nces.ed.gov/datalab>, and to qualified researchers through the IES restricted-use data licensing program.

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:16 will establish the base year cohort for a B&B study of bachelor's degree recipients, with a follow-up survey one year later (B&B:16/17) and additional follow-ups anticipated in 2020 and 2026. A section of the student interview will capture information about students' graduate school and career plans to support analysis of graduate education and employment outcomes.

A third purpose of NPSAS is to provide a nationally representative sample that can be used to rigorously address fundamental research questions through experimental research methodologies. NCES plans to expand the use of NPSAS through collaboration with the National Center for Education Research (NCER). NPSAS provides a rich source of data that could potentially be used to support experimental research funded by NCER. Interested researchers will be asked to submit a proposal that details their experimental design and analysis plans. Upon grant review and approval, RTI will conduct any needed data collection and/or file-matching activities and deliver a restricted data file to NCES to provide to the grantee for analysis. More detail about the possibility of working with NCER will be provided in the forthcoming request for OMB approval of student data collection in the fall of 2014.

b. NPSAS:16 Research and Policy Issues

Many of the important questions that NPSAS:16 aims to address are the same as in the past years. Price increases, net price levels, and increases in student loan debt will continue to be central issues. The NPSAS:16 data will be used to address policy issues related to the changes in federal financial aid programs resulting from the anticipated reauthorization of the Higher Education Act. Some of the primary research and policy issues to be addressed through the use of NPSAS:16 data will likely be:

(1) Student demographics;

- What is the distribution of student enrollment among types of institutions by gender, race/ethnicity, age, dependency, and income?
- What types of institutions are serving the largest proportions of low-income, non-traditional, and ethnic minority students?
- What proportion of undergraduates are first generation college students, and what types of institutions are they attending?
- What proportion of students are immigrants or children of immigrants, and what types of institutions are they attending?
- How much are students with disabilities participating in postsecondary education?
- What proportion of students enrolled in postsecondary education are active military or veterans and what types of institutions do they attend?

(2) Academic preparation and programs;

- What proportion of college students have taken remedial courses and in what subjects?

- What types of students are enrolled in vocational certificate, associate's, and bachelor's degree programs, and what are their fields of study?
- What is the extent of internet-based and other distance education, for certain courses or for entire programs of study, and what types of institutions and students are using it?
- What are students' primary purposes for enrolling in postsecondary education and their educational goals?

(3) Financial aid;

- What proportion of students has financial aid need and what is the average amount of need by income?
- What proportion of students has remaining need beyond what they receive in financial aid and what is the average amount of unmet need?
- What proportion of students receives 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 is the average amount received?
- What proportion of students is 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 receives veterans and other Department of Defense benefits, and how much do they receive?
- How has the incidence and average amount of Veterans' benefits changed since the enactment of the Post-9/11 GI Bill (P.L. 110-252)?
- How has the number and proportion of nonveterans receiving Veterans' benefits as dependents of veterans changed since enactment of the Post-9/11 GI Bill (P.L. 110-252)?
- What types of institutions enroll the highest proportions of active military personnel, veterans, and recipients of Veterans' benefits?

(4) Price of attendance;

- What are the differences in the average tuition and total price of attendance by type of institution and among students by dependency, income, and full-time or part-time attendance status?
- What is the average net price of attendance (student budget minus financial aid) at various income levels at different types of institutions?

(5) Student borrowing;

- What are the differences in the percentage borrowing and the average amounts borrowed through the federal student loan programs by institution type, attendance status, class level, and income?

- What proportion of students borrow the maximum Direct (Stafford) loan amounts?
- What is the difference in the proportion of students receiving subsidized or unsubsidized Direct (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 borrows private loans, in what amount, and how does this borrowing vary by institution type?
- What proportion of students use credit cards to finance their education, and how much do they borrow?

(6) Student employment;

- What proportion of students engage in paid work while enrolled and what are the average hours per week they work?
- What is the average amount earned from work while enrolled?
- What proportion of students is employed by their institution in work-study and graduate assistantships as compared with other types of employment?

(7) Sources of funds;

- What types of financial support are dependent students receiving from their parents?
- What is the estimated proportion of students who might benefit from the federal education tax benefits (such as the American Opportunity and Lifetime Learning tax credits) based upon family income, tuition paid, and grant aid received?

Answers to these and other questions are vital if policymakers at the local, state, and national levels are to respond adequately to the changing environment of postsecondary education. As the publications listed in appendix A indicate, since inception, the NPSAS, BPS, and B&B series have resulted in numerous NCES publications addressing these issues. The data from these studies have also been used extensively to explore Sample Surveys division issues through the NCES Postsecondary Analysis Resources (PEAR) series.

3. Use of Information Technology

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

We do not expect that institutions will ask to provide a paper list, but the data security plan will outline protocols for handling faxed materials that conform to data security requirements. The original file or paper list containing all students with Social Security numbers (SSNs) will be kept through data collection in order to resolve any issues with student identification that occur during data collection.

These files will be deleted and lists shredded after data collection. RTI will ensure that the SSNs for non-selected students are securely discarded.

4. Efforts to Identify Duplication

Efforts to identify duplication have included NCES consultations with other federal offices, such as the Department's Office of Postsecondary Education; the Office of Planning, Evaluation and Policy Development; and other agencies, such as the National Science Foundation; the Congressional Budget Office; and the Office of Management and Budget. NCES also routinely consults with non-federal associations such as the American Council on Education; the Association of Private Sector Colleges and Universities; the National Association of Student Financial Aid Administrators; the National Association of Independent Colleges and Universities; the Council of Graduate Schools; and the Institute for Higher Education Policy to confirm that the data to be collected through NPSAS are not available from any other sources. Academic researchers are also consulted, with several attending NPSAS Technical Review Panel meetings along with representatives from federal agencies, associations, and postsecondary institutions. Beyond identification of duplication, these consultations provide methodological insights from the results of similar and related studies conducted by NCES, other federal agencies, and nonfederal sources. The consultations also assure that the data collected through NPSAS will meet the needs of the federal government and relevant organizations. There are no other studies in the U.S that duplicate the data produced by NPSAS.

5. Method Used to Minimize Burden on Small Businesses

The burden associated with enrollment list collection is relatively minor for all institutions, including small businesses that may be contacted as part of the NPSAS:16 field test (for-profit schools and other small public and private schools). NPSAS:16 is asking for a minimal set of variables on the enrollment lists, and institutions will be offered alternative methods of providing requested data, including uploading to a secure website or emailing encrypted list files. We will attempt to minimize the intrusion and burden to such schools by working closely with a school-appointed coordinator before the data collection effort to identify the sources of information within the school and the format in which records are kept. We have also discussed enrollment list variables with the technical review panel to ensure that the request is minimally burdensome and consistent with typical recordkeeping at postsecondary institutions.

6. Frequency of Data Collection

This cycle of NPSAS will take place 4 years after the last data collection. 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 in helping predict future costs for financial aid because loan programs create continued obligations for the federal government as long as the loans are being repaid.

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

7. Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

8. Consultants Outside the Agency

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

Previous NPSAS implementations have benefited from a technical review panel composed of staff from several offices in the Department, representatives of OMB and CBO, and non-federal members who are considered experts in issues in postsecondary education, including financial aid. Several meetings of the NPSAS:16 technical review panel are planned. The institution data collection TRP (see appendix B) has already provided expert review of the institution contacting procedures and variables to be collected during the enrollment list collection. A second TRP, with some overlap in membership, will review plans for the field test study design and key topics during a summer 2014 meeting, and will review plans for the full-scale study design during a meeting planned for summer 2015. Subsequent to the TRP meeting, a separate request for OMB review related to student-level data collection activities, specifically, the student interviews and student record collection from institutions, will be submitted in the fall 2014.

9. Provision of Payments or Gifts to Respondents

No payments or gifts to responding institutions will be given.

10. Assurance of Confidentiality

NCES assures participating individuals and institutions that any data collected under NPSAS and related programs shall be in total conformity with NCES's standards for protecting the confidentiality of identifiable information about individuals [Education Sciences Reform Act (ESRA); 20 U.S.C. § 9573(a)]. 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:16 according to the following excerpts: 99.31 asks "Under what conditions is prior consent not required to disclose information?" and explains in 99.31 (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 specific conditions. The NPSAS:16 collection falls under:

Sec. 99.31 (a)(3). The disclosure is, subject to the requirements of Sec. 99.35, to authorized representatives of--

- (i) The Comptroller General of the United States;
- (ii) The Attorney General of the United States;
- (iii) The Secretary; or
- (iv) State and local educational authorities.

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

- The Statement of Work of this contract;
- Privacy Act of 1974 5 U.S.C. § 552(a) (2009);
- The U.S. Department of Education Incident Handling Procedures (February 2009);
- The U.S. Department of Education General Handbook for Information Technology Security General Support Systems and Major Applications Inventory Procedures (March 2005);
- The U.S. Department of Education, ACS Directive OM: 5- 101, Contractor Employee Personnel Security Screenings.
- Family Educational and Privacy Act of 1974, 20 U.S.C. § 1232(g) (2009);
- ESRA, 20 U.S.C. §§ 9573 (2009); and
- Any new legislation, which impacts the data collection through this contract.

RTI will also comply with the Department's IT security policy requirements as set forth in the Handbook for Information Assurance Security Policy and related procedures and guidance as well as IT security requirements in the Federal Information Security Management Act (FISMA), OMB Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance.

All data products and publications will also adhere to the revised NCES Statistical Standards, as described at the website: <http://nces.ed.gov/statprog/2012/>.

The NPSAS:16 procedures for maintaining confidentiality include notarized nondisclosure affidavits obtained from all personnel who will have access to individual identifiers; 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:16 follows detailed guidelines for securing sensitive project data, including, but not limited to: physical/environment protections, building access controls, system access controls, system login restrictions, user identification and authorization procedures, encryption, and project file storage/archiving/destruction. We do not anticipate receiving enrollment lists via fax, but any that are received will be securely shredded upon study completion. Electronic enrollment lists will reside within an independent secure network, and be deleted upon study completion.

Furthermore, the Department has established a policy regarding the personnel security screening requirements for all contractor employees and their subcontractors. The contractor must comply with these personnel security screening requirements throughout the life of the contract. The Department directive that contractors must comply with is OM:5-101, which was last updated on 7/16/2010. 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. The confidentiality agreement related to these security features is provided in appendix C.

Study notification materials sent to institutions will describe the voluntary nature of the NPSAS:16 survey and convey the extent to which respondent identifiers and all responses will be kept confidential. Similarly, the scripts to be read by telephone staff will be very specific in the assurances made to respondents and contacts. Contacting materials are presented in appendix D. The following confidentiality language is provided in the study brochure that is supplied to all sample members:

The 2015-16 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 authorize NCES to collect and disseminate information about education in the United States. Collection is most often done through surveys.

NCES is required to follow strict procedures to protect the confidentiality of persons in the collection, reporting, and publication of data. All individually identifiable information supplied by individuals or institutions 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).

There are security measures in place to protect data during file matching procedures described in section 3. 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.

Regarding file matching with administrative sources, FERPA (34 CFR Part 99) allows the disclosure of information without prior consent for the purposes of NPSAS:16 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.”

All three parts of 99.31(a)(6)(i) apply to NPSAS:16. The purpose of NPSAS:16 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).

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.

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 RTI’s 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:16 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 the Department's system of recording federally aided student loans taken out by students and grants received. In NCE's 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.

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 contractor. 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.

11. Sensitive Questions

Institutions will be asked to provide personally-identifying information for students on the enrollment lists (including name, contacting information, SSN, and date of birth (DOB)). Although considered sensitive, items collected on the enrollment lists will facilitate 1) identification of minors in the sample, 2) selection of the student sample, 3) initial tracing and locating activities, and 4) ongoing follow up with the baccalaureate cohort as part of the Baccalaureate and Beyond Longitudinal Study. Immediately after the student sample is selected, the SSNs for non-selected students will be securely discarded.

12. Estimates of Response Burden

Projected estimates for response burden and costs for NPSAS:16 are based on experiences from prior rounds of NPSAS. Using time burden data for similar institutional data collection tasks, we estimate the average burden associated with the enrollment list collection to be approximately 2.75 hours per institution. The estimated hourly cost to institutions was raised from \$17 for NPSAS:12 to \$21 for NPSAS:16 to reflect salary increases at those institutions. The total estimated cost to institutions participating in the NPSAS:16 field test enrollment list data collection for the 724 total burden hours is \$15,204. This submission is for field data collection of institution materials and enrollment lists only. Burden estimates for data collection from and about sampled students will be submitted in a separate package in fall 2014.

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

1. Upload encrypted student enrollment list files to the project's secure website using a login ID and "strong" password provided by RTI, or
2. Email an appropriately encrypted list file directly to RTI.

Based on NPSAS:12 full-scale results, we expect that most NPSAS:16 enrollment lists will be uploaded to the project website, and very few enrollment lists will be sent via e-mail.

Table 2. Maximum estimated burden on institutions for the NPSAS:16 field test enrollment list collection

Data collection activity	Institution sample	Expected eligible institutions	Number of responding institutions	Percent expected response rate	Average time burden per response (hours)	Range of response times (hours)	Total time burden (hours)
NPSAS:16 field test study							
Eligibility screening calls	300	290	300	†	.08	.03-.10	24
Institutional registration page	†	290	247	85	.08	.05-.11	20
Institutional enrollment lists	†	290	247	85	2.75	1.0-6.0	680
Field test Institutional total			300	(794 responses)			724

† Not applicable.

13. Estimates of Cost

There are no additional costs to the respondents.

14. Costs to Federal Government

A summary of estimated costs to the federal government for NPSAS:16 are shown in table 3.

Table 3. Individual and total costs to NCES for the NPSAS:16 field test and full-scale implementations

NPSAS:16 implementations	Costs to NCES
Field test	
NCES Salaries and expenses	\$62,370
Contract costs	7,173,724
Total	7,236,094
Full-scale study	
NCES Salaries and expenses	197,739
Contract costs	13,574,629
Total	13,772,368
Total costs	
NCES Salaries and expenses	260,109
Contract costs	20,748,353
Total	\$21,008,462

NOTE: Costs presented here do not include base fee.

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 (although this request is for field test institution contacting and enrollment list collection, the costs shown here are for the full study, including institution and student data collection efforts; request for field test student data collection will be submitted in fall 2014). Table 4 provides a more detailed breakdown of contract costs.

Table 4. Contract costs for NPSAS:16

Study area and task	Budgeted amount
110 Post award conference	\$25,400
120 Schedules	26,353
130 Monthly reports	215,474
140 Integrated monitoring system	544,143
150 Technical review panels	1,286,662
160 Mini-meetings	135,116
Standardized institution data collection	
210 Task 2 Comparison Report	323,667
220 Institution Data Reporting System	358,575
Field test data collection	
310 Sampling	379,416
320 OMB forms clearance	141,586
321 Instrument development	1,776,265
322 Training	336,001
323 Tracing	99,365
324 Student data collection	738,821
325 Student data processing	489,743
332 CPS file merge	19,479
333 NSLDS file merge	11,573
334 Other system file merge	73,373
335 Develop data collection materials	161,337
340 Methodology memorandum	202,961
351 Enrollment list collection	612,974
352 Institution data collection	155,653
353 Institution data processing	237,622
Full-scale data collection	
410 Sampling	474,362
420 OMB forms clearance	105,070
421 Instrument development	1,048,446
422 Training	406,704
423 Tracing	605,531
424 Data collection	4,432,465
425 Interview data processing	1,262,758
432 CPS file merge	50,053
433 NSLDS file merge	34,463
434 Other system file merge	218,940
435 Develop data collection materials	111,009
436 Weighting, imputation, and nonresponse bias analysis	212,304
437 Data disclosure	29,388
441 Enrollment list collection	698,939
442 Institution data collection	462,466
443 Institution data processing	759,727
Reporting	
511 Report prospectus	57,125
512 Draft manuscript	245,997
513 Review-quality manuscript	151,531
514 Public-ready manuscript	90,942
515 Respond to professional judgment	19,789
610 Respond to information requests	564,165
620 Major IT data reporting	242,693
630 Ad hoc reports	111,926
Total	\$20,748,353

15. Reasons for Changes in Response Burden and Costs

There has been no change in burden per institution since the full-scale data collection for NPSAS:12. This request for approval is for the field test data collection from institutions only, with approval for data collection from students to be sought later this year. As such, the response burden requested in this submission is lower

than the last approved response burden for full scale institution and student NPSAS:12 data collection.

16. Publication Plans and Time Schedule

The operational schedule for the NPSAS:16 field test and full-scale study is shown in table 5. The formal contract for NPSAS:16 requires the following reports, publications, and other public information releases:

- Descriptive summaries of significant findings for dissemination to a broad audience;
- Detailed data file documentation describing all aspects of the full-scale study design and data collection procedures, including an appendix summarizing the methodological findings from the field test;
- Complete data files and documentation for research data users in the form of both a restricted-file; QuickStats, a public-use data analysis system in which users create their own tables and charts using pre-defined categories from a subset of variables; and PowerStats, which allows users to create their own tables and charts using all of the variables, in addition to conducting regression analysis;
- Special tabulations of issues of interest to the higher education community, as determined by NCES.

Table 5. Operational schedule for NPSAS:16

NPSAS:16 activity	Start date	End date
Field test		
Contacts with institutions to request enrollment lists	Sept. 15, 2014	Feb. 3, 2015
Enrollment list collection	Jan. 29, 2015	Jul. 31, 2015
Select student sample ¹	Jan. 30, 2015	May 14, 2015
Collect student data from institution records	Mar. 2, 2015	Jun. 30, 2015
Self-administered web-based data collection	Mar. 2, 2015	Jun. 30, 2015
Conduct telephone interviews of students	Mar. 23, 2015	Jun. 30, 2015
Process data, construct data files	Feb. 13, 2015	Aug. 31, 2015
Prepare/update field test reports	May 4, 2015	Dec 18, 2015
Full-scale study		
Contacts with institutions to request enrollment lists	Oct. 1, 2015	Feb. 26, 2016
Enrollment list collection	Jan. 11, 2016	Jul. 10, 2016
Select student sample	Jan. 18, 2016	Jun. 1, 2016
Collect student data from institutional records	Feb. 1, 2016	Sept. 30, 2016
Self-administered web-based data collection	Feb. 1, 2016	Sept. 30, 2016
Conduct telephone interviews of students	Feb. 22, 2016	Sept. 30, 2016
Process data, construct data files	Jan. 22, 2016	Jun. 14, 2017
Prepare/update reports	Aug. 1, 2016	July 31, 2018

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 is being requested.

¹ Student samples will be selected from lists received by May 8, and the remaining lists will be used for a methodological test (see section B2 for more details).

18. Exceptions to Certification for Paperwork Reduction Act Submissions

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