

**Evaluation of the Pell Grant
Experiments Under the
Experimental Sites Initiative**

**OMB Renewal Supporting
Statement:**

Part A

May 20, 2015

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OMB Package for the Pell Grant Experiments

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PART A: SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

The Institute of Education Sciences (IES) at the U.S. Department of Education (ED) requests approval to continue and extend an evaluation of the effects of two Pell Grant Experiments (PGE) demonstrations under the Experimental Sites Initiative (ESI). The ESI, authorized by section 487A(b) of the Higher Education Act of 1965 (HEA), allows the Secretary to grant waivers from specific Title IV HEA statutory or regulatory requirements to enable institutions to test alternative methods for administering those federal student aid programs. The two demonstrations are targeted to income-eligible postsecondary students interested in vocational training but who could not otherwise receive a Pell grant because: (1) they currently have a bachelor's degree, or (2) they seek to enroll in a vocational program that is shorter than the current minimum duration and clock hours. Because of the potential high costs - and benefits - of expanding Pell grant eligibility in these two ways, ED has decided to rigorously assess the demonstration

The initial Information Clearance Request (ICR) for this evaluation, with the evaluation design and data collection instruments, was approved through NOA on August 16, 2012 for the period up to August 31, 2015. Since that time, aspects of the evaluation have changed that now require an extension in the data collection period through August 2018. Specifically, two issues necessitate this extension:

- **Smaller than expected sample size.** The initial ICR indicated that 51 separate schools and 10,800 students would participate in the two Pell experiments during financial aid award years 2012-2013 and 2013-2014 based on estimates provided by FSA. However, while projections of the participating schools proved accurate, schools have been slower than initially projected to identify and enroll eligible students. In order to achieve sample sizes sufficient to estimate impacts of the Pell grant, it is necessary to extend the enrollment period for the experiments, as well as the data collection period for school records, for an additional two years beyond the three years initially requested (2014-2015 and 2015-2016). Data collection originally scheduled for fall 2013, 2014, 2015 will be collected in summer 2015, 2017, and 2018. A smaller study sample will result in a burden reduction for participating schools.
- **Lower than expected survey response rates.** The initial ICR included a survey of 2,500 students in the sample-very low-income adults who are unemployed or underemployed, most in very short-term training programs (less than 15-weeks). The current response rate (30%) is too low to yield a sample size that can be used to estimate impacts on measures from the survey despite repeated phone, email, or regular mail follow up efforts. Given the high costs associated with fielding the survey

and smaller than expected sample sizes, continuing to field the survey programs using a random assignment design. The study will examine the

impacts of each experiment on employment and earnings, participation in education and training and job support activities, and student debt and financial aid receipt.

OVERVIEW OF THE DEMONSTRATIONS AND STUDY APPROACH

Under the ESI, Title IV institutions choose to participate in demonstrations or “experiments” in response to a notice from ED’s Office of Federal Student Aid (FSA). FSA published such a notice in October 2011, inviting postsecondary schools to participate in any of 8 different experiments¹, two of which expanded Pell grant eligibility for students seeking job training. That notice also specified the institutions’ obligations to provide data and to ensure that a control or comparison group could be formed so that the effects of participating in the experiments could be evaluated. In subsequent webinars, FSA has provided additional detail to interested institutions about the demonstrations and the evaluation.

1. The Two Pell Grant Experiments (PGE)

Under the current ESI, postsecondary schools will receive waivers to enable them to provide Pell Grants to students who would not otherwise qualify under current Pell Grant rules. The PGE evaluation will include two substudies, each of which relaxes one eligibility criterion for receipt of a Pell Grant:

1. **Experiment 1.** Students who already hold a bachelor’s degree and who document that they are unemployed or underemployed will be able to receive Pell Grant award support. This support can be for up to a one-year program of vocational education intended to help them obtain employment, to be used over no more than two award years. Current rules do not allow individuals with a bachelor’s degree to receive Pell support unless it is to be used for teacher certification or licensure.
2. **Experiment 2.** Students will be able to receive a prorated amount of Pell Grant financial support for short-term vocational training that lasts for at least 150 clock hours over a period of at least 8 weeks. Current rules require that a student’s academic program is at least 600 clock hours (or an equivalent in semester, trimester, or quarter hours) over at least 15 weeks to qualify for Pell support.

2. Selecting Schools

Schools that volunteered to implement Experiments 1 and 2, that were in good standing in administering Title IV programs (e.g., related to compliance, default rates, etc.), and that agreed to meet the requirements of the evaluation form the study school sample. ED expects the sample to

¹ See <https://experimentalsites.ed.gov/exp/index.html>

include a maximum of 28 schools for Experiment 1 and 40 for Experiment 2, but with approximately 17 intending to participate in both experiments. Although there will be 51 distinct schools participating, because each experiment will be studied separately there will be a total of 68 experiments underway. Each school will identify the set of vocational or job training programs to which the experiments will apply.

3. Identifying Eligible Students

Recruitment, enrollment, and random assignment of sample members into the PGE study will be the same for both substudies and will involve several steps (Figure A.1). Participating schools will recruit applicants and encourage them to submit both the Free Application for Federal Student Aid (FAFSA) (typically completed on line) and an application to the PGE-eligible program in which the student wants to enroll. Simultaneously or sequentially, FSA will process the FAFSA and the school will determine whether the student can be admitted to the vocational program. Students will receive a Student Aid Report (SAR) and schools an Institutional Student Information Record (ISIR), which provides an assessment of the applicant's expected family contribution (EFC) towards his or her educational expenses.

Because the potential participants in the study would not ordinarily be eligible for Pell grants, by virtue of their educational characteristics or their program, the PGE schools will need to determine a way to identify candidates for the experiments rather than processing their aid packages in the usual manner. Most likely, the institutions will ensure that financial aid office staff flag students who apply to the PGE eligible programs and review their ISIRs separately.

4. Random Assignment

Once candidates for the experiments are identified by the institutions, school staff will send these eligible individuals (evaluation contractor-provided) information about the study that also requests students' consent to participate. School staff will data-enter into a web-accessible, study-specific random assignment system the names and Social Security numbers of eligible admitted applicants who have given consent, as well as a very limited amount of other information about the individual and PGE program, so that random assignment can be conducted.² In real-time (with little delay), the school then will be notified of the research group status of each study participant. Approximately 60 percent of participants will be assigned to the treatment group, and the remaining 40 percent will be assigned to the control group.

² Randomly assigning within programs will promote treatment-control group balance on this important dimension. This might allow the evaluation to calculate impacts separately by occupational area.

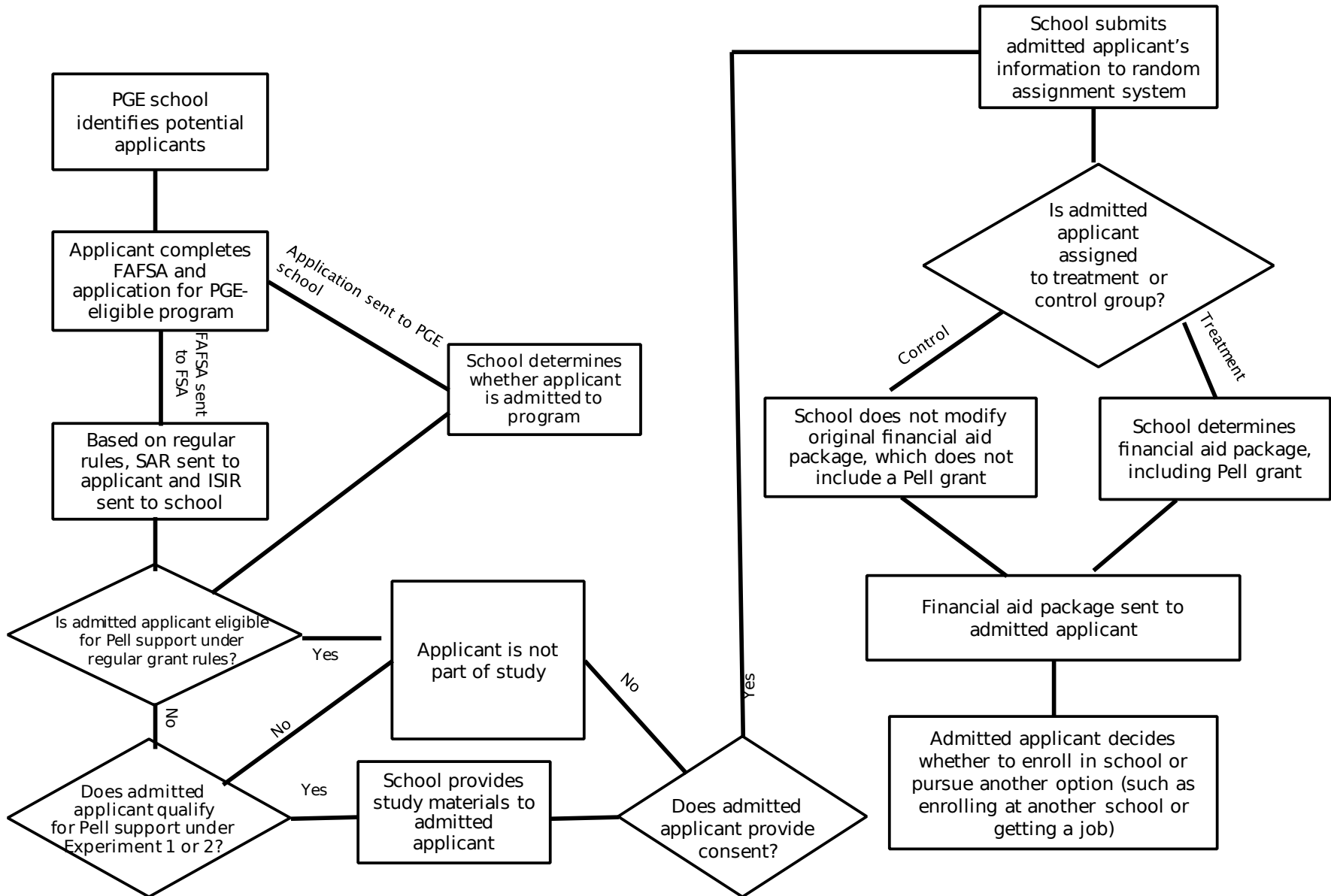
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Control group members will have access to the normal financial support that they are eligible for (i.e., excluding a Pell Grant). Study participants assigned to the treatment group will be offered a Pell grant, and the school will take this into account in determining any other aid for which the student is eligible. The financial aid packages will then be provided to the study participants. Regardless of whether the participant is assigned to the treatment or control group, he or she can choose to enroll at the PGE school, enroll at another school to which he or she has been admitted, or pursue some other type of activity.³

It is estimated that schools in Experiment 1 will enroll 25 participants, on average, while schools in Experiment 2 will enroll 100 participants into the study, for a total of 700 sample members in Experiment 1 and 4,000 in Experiment 2. Thus, total sample enrollment for the study will be 4,700. The study participants will consist of individuals who have been determined to be eligible for the study under either experiment and who have consented to be in the study.

³ The particular methods that schools use to recruit potential sample members and any screening that is conducted to assess applicants' interest levels in the PGE program before random assignment is conducted will have an influence on the rate at which study participants enroll in the PGE program.

Figure A.1. Stylized Model of the Recruitment, Enrollment, and Random Assignment Process for PGE When There Is Need-Blind Admissions



5. Collecting Data

Both substudies of PGE will have the same data collection plans. These collection plans include new burden imposed by collecting PGE school data for all study participants. The plans also include use of two other types of data—FSA data and annual earnings data maintained by the Social Security Administration (SSA)⁴—that do not generate data collection burden on participating schools or students. These data are described in detail in Section A.2. Together, these data will provide a rich set of information from which we can estimate the impacts of expanded Pell grant eligibility on study participants' educational experiences and student debt, the characteristics of participants and their vocational programs, as well as exploratory analysis of impacts on participants' employment and earnings outcomes.

6. Reporting

The schedules for sample enrollment and program participation, as well as when post-program outcomes can be observed, drives the project's reporting schedule. The study is expected to last 6.5 years, from October 2012 to March 2019 (Figure A.2). Enrollment of school applicants into the study began in November 2012. Although each of the 68 experiments in the study might take a slightly different amount of time to complete its enrollment of study participants, enrollment for the study is expected to continue through June 2016.

Most of the study participants who enroll in Experiment 2 are expected to complete their participation in education or training in a fairly short time (two to four months), while participants who enroll in Experiment 1 are expected to take 9-14 months but could be up to two years if attending less than full-time. It is expected that all sample members who participate in a PGE program will complete their training program by summer 2018. The first full post-program calendar year for all study participants will be 2019, although many of the participants who entered the study early in the sample enrollment period are expected to have had a full year of post-program experiences prior to then. SSA data covering calendar year 2017 is expected to be available for analysis in preliminary form in summer 2018⁵, making it possible to draft a report and have it go through IES' statutorily required review process for publication in late spring 2019.

⁴ There is also some possibility of obtaining quarterly wage data from the National Directory of New Hires (NDHD) maintained by the U.S. Department of Health and Human Services. There is pending legislation to expand access to the database for federal research purposes. If this access is available during the evaluation period, we would consider substituting NDNH data for the FSA annual earnings data.

⁵ A full year of post-program SSA data on employment and earnings will only be available for a partial sample of participants (i.e., those who completed their training as of the end of 2016).

A1. Circumstances Necessitating the Data Collection

Federal Pell grants are considered the foundation of higher education financial aid for low-income students. Available to those with family incomes up to \$60,000, most Pell awards go to students with family incomes below \$30,000. In 2009-2010, 8 million students received Pell grants to attend some kind of postsecondary education or training, at a total cost of \$30 billion in government expenditures (U.S. Department of Education 2010).

However, not all income eligible students obtain a Pell grant. For example, among postsecondary students from households with income below \$10,000, 58 percent received a Pell grant while the remaining 42 percent did not (Baum and Payea 2011). Some may be unaware that such aid is available or are unable to complete the process of obtaining the grants. But with unemployment above 8.5 percent in 2011, and some reports of unfilled openings for skilled jobs in some occupations⁶, higher education institutions have called for expanding Pell grants to help fill the skill training gap for low-income workers. The Pell grant experiments under the ESI provide an opportunity to test out the use of federal funds in this way.

Under the ESI statute, the Secretary is required to review and evaluate the experiences of institutions that participate as experimental sites and, on a biennial basis, submit a report based on the review and evaluation to the authorizing committees (section 487A(b)(2)). If the study's proposed data collection were not undertaken, ED would not be able to fulfill this mandate; the demonstrations - and the funds set aside for them -- would not yield rigorous evidence on whether expanding eligibility to underemployed and underemployed individuals with bachelor's degrees (Experiment 1) or to individuals applying to short-term career training programs (Experiment 2) can raise their employment and earnings. The collaboration between IES and FSA on this PGE demonstration and random assignment evaluation will provide credible and reliable information to help guide future policy decisions in this area of federal financial aid.

In particular, the data collection for and evaluation of the two Pell Grant experiments will address the following research questions:

1. Characteristics of Participating Schools' Programs and Applicants

- What are the characteristics of the education or training programs identified by participating institutions as most suitable for the experiments (e.g., field of study, intensity, duration, and cost)? How are study applicants distributed across them?

⁶See, for example, interviews with manufacturing executives: http://www.cnbc.com/id/44838614/Need_Work_US_Has_3_2_Million_Unfilled_Job_Openings; <http://www.ft.com/cms/s/0/6d586922-21f0-11e1-8b93-00144feabdc0.html#axzz1queCR3E0>

- What are the personal and family background characteristics of individuals who qualify for each of the experiments?
- To what extent does the availability of Pell grants for short-term training under the experiments shift enrollments from longer-term programs traditionally eligible under Title IV to shorter ones?

2. Education-Related Outcomes

- To what extent does the offer of a Pell grant affect enrollment in the participating institutions' education and training programs? In what kinds of programs do study participants enroll?
- Do students not offered a Pell grant go elsewhere for skills training?
- What is the impact on education and training outcomes overall (e.g., credits earned, completion rates, time to complete, and credentials attained) and on access to support services such as job search assistance?
- Does the offer of a Pell grant affect the amount of student debt incurred?
- How are education and training costs distributed across different types of financing strategies, such as grants, loans, and personal or family savings?
- Is there an impact on barriers that can hinder students from successfully completing their education and training plans?

3. Employment-Related Outcomes

- What is the relationship between being offered a Pell grant on short-term employment rates and earnings levels?
- What are the characteristics of jobs attained (e.g., relatedness to PGE program, duration, availability of fringe benefits)?

Figure A.2. Time Line for the Pell Grant Experiments Study

	2012		2013				2014				2015				2016				2017				2018				2019	
Contract Month	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	Jan-Mar	Apr-Jun	
1. PGE School Planning Phase	■																											
2. Study Participant Enrollment	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■												
3. Expected Program Completion Period			■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	
4. FSA Data Extraction												•								•				•				
5. Data Extracts from PGE Schools												•								•				•				
6. Analysis of PGE School Data												■	■							■				■				
7. Analysis of SSA Data																								•	■	■		
8. Final Report																										△	□	

△ Draft Deliverable □ Final Deliverable • Data Extract

A2. How, by Whom, and for What Purpose Is the Information to Be Used

Information for the PGE evaluation will be collected and analyzed by a contractor selected through a competitive procurement. Data from three sources will be used for the study: (1) PGE school data, (2) FSA data, and (3) SSA data. Data from the first source generates new burden, while the other two do not. This section describes the three types of data in detail and then explains how each type of data will be used to answer the study's research questions.

PGE school data. PGE schools will provide three two types of data. First, on a weekly basis school staff, most likely in the financial aid office, will send the evaluation contractor the list of candidates identified as eligible for the experiments during that period and who have been sent consent material (see Table A.1). The list will include each candidate's name, program, and the date consent material was sent to him or her. This will allow the contractor to track the consent process and ensure that only students with consent participate in the demonstrations.

The second type of PGE schools will supply data is that is needed for random assignment. School staff will need to enter a limited amount of identifying information - name, SSN, date of birth, and program - about all study-eligible participants with consent into a web-accessible system. Entering this data will ensure that: (1) the integrity of the random assignment process is maintained; (2) no individual goes through random assignment more than once; and (3) the treatment and control groups are balanced on important characteristics. The data will be collected on a rolling basis as individuals enter the study.

The third second type of data PGE schools will provide pertains to characteristics of students who have enrolled at the school, regardless of whether the study participants were assigned to the treatment or control group. These data will provide information about the rates of enrollment at PGE schools, the types of programs in which the students enrolled, and the students' progress and completion rates. The data also will contain information about the financial aid offers given to study participants, regardless of whether or not they enrolled at the school. The first extract of these data, to be provided in summer 2015, will be used to test the data collection process and ensure that schools correctly record data items. The second extract, to be provided around summer 2017, will contain most of the entire study sample that enrolls at PGE schools. The third extract, to be provided around in fall 2018, will include the full expected history of participants' PGE-related program experiences. This extract is timed so that it can include the program experiences of participants who enter the study near the end of the sample enrollment period and who participate in relatively long programs. However, collecting these school data extracts at multiple points will be important to ensure that the data are being properly collected and retained for the study's analysis.

FSA data. The main type of data to be provided by the FSA will come from the FAFSA form, which contains identifying, contact, and background information used to process individuals’ requests for federal student aid. The background information will be used to describe the characteristics of study participants. In addition, it will enhance the estimation of program impacts by allowing the influence of these characteristics to be netted out of the estimation process. These data will be collected three times. The first time will be in summer 2015 as a test of the data extraction process early in the study enrollment period. The second time will be in summer 2017, and the third time, in summer 2018, will provide additional information available about sample members’ access to and use of financial aid (items that are not available through the FAFSA), as well as FAFSA information for any study participants that enroll after the previous extracts were provided.

Table A.1. PGE Data Collection Plan

Data Type	New Data Collection Burden?	Frequency and Timing of Data Collection	Data Items
PGE School Data	Yes	Rolling basis during sample intake from summer 2012 to June 2016	Study participants’ name, SSN, and date of birth, as well as the PGE program to which he or she has applied, for purpose of random assignment
	Yes	3 times (summer 2015, 2017, and 2018)	Start/stop dates for enrollment at school, characteristics of the education/training participated in, credits earned, credentials attained, financial aid offered and received, placement and support services provided
FSA Data	No	3 times (summer 2015, 2017, and 2018)	Identifying information; locating information; background information on demographics, educational attainment, income, and assets, financial aid obtained
SSA Data	No	1 time (fall 2018)	Annual earnings from Social-Security-covered employment, for calendar years 2011 through 2017

SSA data. Each year, employers are required to report to the Internal Revenue Service (IRS) the total earnings subject to Social Security for the calendar year. SSA receives these data from the IRS to determine eligibility for Social Security benefits. The Master Earnings File contains earnings records for each worker with a SSN who has worked in covered employment.⁷ To protect the privacy of individuals, SSA does not release earnings data for individuals. Instead, it provides summary earnings statistics for groups of people. Accordingly, the study team will request that SSA run computer programs to estimate earnings impacts (that is, differences in mean earnings between treatment and control group members) and their associated levels of statistical significance. The process will involve having the study team send to SSA a data file containing identifying information (such as SSN, name, and date of birth) and other data needed to run the computer programs, as well as the code for the computer

⁷ About 96 percent of all workers in employment or self-employment are covered under the Old-Age, Survivors, and Disability Insurance (OASDI) program (Social Security Administration 2001). Workers who are not covered include (1) civilian federal employees hired before 1984, (2) railroad workers, (3) some employees of state and local governments who are covered under their employers’ retirement systems, (4) people with net annual earnings from self-employment below \$400, and (5) domestic and farm workers with low earnings.

programs. SSA will match the study sample to the Master Earnings File, run the computer programs, verify that output complies with regulations related to the privacy of the data, and send to the study team the output from these computer runs.

The Master Earnings data are updated annually, with more than 90 percent of the records updated by August of the following calendar year. These data are complete by the following February. Hence, the lag in obtaining earnings information is about 8 to 14 months. For example, data pertaining to calendar year 2017 will become available in preliminary form in August 2018. The analysis will use SSA data from calendar years 2011 through 2017. Data covering calendar year 2011 will provide a clean measure of baseline earnings for all sample members. Data covering calendar year 2017 will provide a clean measure of post-program earnings for the portion of sample members who complete their program enrollment by December 2016. This will include all Experiment 1 participants who enroll prior to January 2015, and all Experiment 2 participants who enroll prior to January 2016. Data covering calendar years 2012 through 2016 will reflect a mix of earnings before, during, and after education and training, depending on when the study participants begin and end their programs.⁸ The study sample size will not be sufficient to measure impacts on employment and earnings with statistical confidence, thus these analyses will be considered exploratory.⁹

Table A.2. Use of the Data to Answer Study Research Questions

Research Question	Main Impacts, Exploratory Impacts, or Descriptive Question	PGE Schools Data	FSA Data	SSA Data
Characteristics of the School Applicants and their Desired Education or Training Programs				
• What are the characteristics of the education or training programs identified by participating institutions as most suitable for the experiments (e.g., field of study, intensity, duration, and cost)? How are study applicants distributed across the programs?	Descriptive	X	X	X
• What are the personal and family background characteristics of individuals who qualify for each of the experiments?	Descriptive	X		
Education-Related Outcomes				
• What is the impact on participation in PGE education and training programs of access to Pell Grant funding by individuals who qualify for Experiment 1 or Experiment 2?	Main impacts	X	X	

⁸ It would be preferable to obtain employment and earnings data from the Unemployment Insurance system maintained by state and/or local workforce agencies. Such data is collected quarterly and contain additional information (e.g., occupational area of employment) that would be useful in either adding to or verifying information obtained through the survey. However, based on the Department of Labor’s experience, pursuing this approach would likely take too long and be too costly given the limitations of the Pell Grant Experiments evaluation.

⁹ A larger sample size is needed for outcomes that are farther away from the “intervention” (the provision of Pell grants that the students wouldn’t ordinarily qualify for). Statistical power calculations suggest that while a sample of about 3,000 would be sufficient to measure impacts on school-related outcomes (enrollment in, persistence, and completion of training), a sample size more than three times larger (10,000) would be necessary to detect statistically significant impacts on employment and earnings.

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Research Question	Main Impacts, Exploratory Impacts, or Descriptive Question	PGE Schools Data	FSA Data	SSA Data
<ul style="list-style-type: none"> For each substudy, what are the characteristics of the education and training programs in which study participants enroll, such as the field of study, intensity, duration, and cost? 	Descriptive	X		
<ul style="list-style-type: none"> For each substudy, what is the impact of access to Pell Grants on study participants' education and training outcomes, such as their credits earned, completion rates, and credentials attained? 	Exploratory impacts		X	
<ul style="list-style-type: none"> For each substudy, what is the impact of access to Pell Grants on the amount of student debt incurred by study participants? 	Exploratory impacts		X	
<ul style="list-style-type: none"> For each substudy, how are the costs of study participants' education and training distributed across different types of financing strategies, such as grants, loans, and personal or family savings? 	Descriptive	X		
<ul style="list-style-type: none"> What is the impact of access to Pell Grants on barriers that study participants from successfully completing their education and training plans? 	Exploratory impacts		X	
Employment-Related Outcomes				
<ul style="list-style-type: none"> For each substudy, what is the impact of access to Pell Grant funding on study participants' employment rates and earnings levels? 	Exploratory impacts		X	X
<ul style="list-style-type: none"> For each substudy, what are the characteristics of jobs that study participants attain? 	Descriptive	X		

A3. Uses of Improved Technology to Reduce Burden

The study will primarily rely on electronic technology to collect data. For each data collection activity, IES has selected the form of technology that will provide reliable information while minimizing respondent burden. This section describes the three activities and their use of technology to reduce burden.

- 1. Collection of PGE school data.** Two types of data will be collected from participating PGE schools: (1) a very limited amount of identifying information so that random assignment can be conducted; and (2) data extracts on the types of training programs that participants enroll in, their educational outcomes, and financial aid information. For the first type of data, the PGE study will use a web-based random assignment database that will facilitate ease of data entry by PGE school staff. The second type of data will be acquired in electronic format whenever possible to reduce the burden on PGE schools in providing the data. The contractor will set up a FTP site so that participating schools can upload data extracts easily and securely.
- 2. Collection of FSA data about study participants.** Data available from the FSA office within ED will include the FAFSA for each study participant, as well as other information about their continued eligibility and receipt of federal financial aid. The FSA data extraction efforts will proceed using the established technology standards and protocols for secure transmission of the data.
- 3. Use of Social Security earnings data for study participants.** The data maintained by SSA will not be directly available to the evaluation researchers; rather, the evaluation team will provide electronic computer

programs to SSA staff who will run the programs on the data and provide output to the evaluation team.

A4. Efforts to Identify Duplication

In designing the PGE evaluation, the study team has examined existing literature and data sources to ensure that this effort does not duplicate existing or available data. To the extent possible, we are relying on extant data and will merely obtain it from the appropriate agencies. Data on the program experiences and labor market outcomes of the target populations can be obtained only through the proposed data collection design.

The PGE school data elements, for which OMB approval for data collection are requested in this package, do not currently exist for this study's target populations (that is, students currently ineligible for Pell Grant eligibility) and can be collected only through the proposed data collection plan. These data will not contain information identical to that available through the FSA, SSA earnings records, or other sources.

A5. Methods to Minimize Burden on Small Business Entities

This data collection effort does not involve small business or other small entities.

A6. Consequences of Not Collecting the Data

The data collected through this study will enable the evaluation to generate unbiased estimates of the impacts of possible changes to Pell Grant eligibility rules on participants' education, training, employment and earnings. Given the cost implications of making these eligibility changes on a larger scale, evidence on impact is crucial. Without collecting the planned data for Experiments 1 and 2, only limited information will be available to justify the use of current funds OMB has set aside for the demonstrations. The data for this evaluation will be obtained from administrative data housed by PGE schools, the FSA, and the SSA.

A7. Special Data Collection Circumstances

This data collection does not involve any special circumstances.

A8. Federal Register Notice

As required by 5 CFR 1320.8 (d), a 60-day *Federal Register* notice was published (May 28, 2015) and a 30-day notice will be published as required. The *Federal Register* announcements provide the public an opportunity to review and comment on the planned data collection and evaluation. No public comments have been received to date.

A9. Respondent Payments

No payments to participating schools or participants are being requested as part of this ICR.

A10. Confidentiality

Policies and procedures related to confidentiality, physical and technical safeguards, and approaches to the treatment of personally identifiable information (PII) will be followed to ensure the confidentiality and protection of all data collected about study participants. In accordance with the Privacy Act, a new system of records was created for this collection and a *Federal Register* notice was published (January 8, 2013) and will be updated in 2015.

a. Confidentiality Policy

ED, its evaluation contractor, Social Policy Research Associates, and all other parties involved in the evaluation of the PGE will follow the policies and procedures required by the Education Sciences Reform Act of 2002, Title I, Part E, Section 183. The act requires “All collection, maintenance, use, and wide dissemination of data by the Institute” to “conform with the requirements of section 552 of title 5, United States Code, the confidentiality standards of subsection (c) of this section, and sections 444 and 445 of the General Education Provision Act (20 U.S.C. 1232g, 1232h).” These citations refer to the Privacy Act, the Family Educational Rights and Privacy Act, and the Protection of Pupil Rights Amendment. In addition, for student information, “The Director shall ensure that all individually identifiable information about students, their academic achievements, their families, and information with respect to individual schools, shall remain confidential in accordance with section 552a of title 5, United States Code, the confidentiality standards of subsection (c) of this section, and sections 444 and 445 of the General Education Provision Act.” Subsection (c) of section 183 referenced above requires the director of the Institute of Education Sciences to “develop and enforce standards designed to protect the confidentiality of persons in the collection, reporting, and publication of data.” Subsection (d) of section 183 prohibits disclosure of individually identifiable information as well as making the publishing or communicating of individually identifiable information by employees or staff a felony.

b. Confidentiality Safeguards

ED, the evaluation contractor, and all other parties involved in the evaluation of the PGE will protect the confidentiality of all information collected for the study and will use it for research purposes only. No information that identifies any study participant will be released. Information from participating institutions and respondents will be presented at aggregate levels in reports. Information on respondents will be linked to their institution but not to any individually identifiable information. No individually identifiable information will be maintained by the study team after the information is no longer necessary for the purpose of

conducting the study and fulfilling contractual requirements. ED will require the evaluation contractor to keep hard copies of documents in securely locked file cabinets, electronic data files to be encrypted, and access to study files to be strictly limited to study staff who have been identified by the project director as having a need to view those files. Respondents will be given written assurance in all advance materials about the PGE study data collection (and verbal reminders during administration of the survey by telephone) that the information they provide will be kept private and will not be disclosed to anyone but the researchers authorized to conduct the study, except as otherwise required by law. Furthermore, ED will require all institution-level identifiable information to be kept in secured locations and identifiers to be destroyed as soon as they are no longer required.

In addition, the following language will appear on all letters, brochures, and/or other study materials:

Per the policies and procedures required by the Education Sciences Reform Act of 2002, Title I, Part E, Section 183, responses to this data collection will be used only for statistical purposes. The reports prepared for this study will summarize findings across the sample and will not associate responses with a specific district or individual. We will not provide information that identifies you or your district to anyone outside the study team, except as required by law. Any willful disclosure of such information for nonstatistical purposes, without the informed consent of the respondent, is a class E felony.

A11. Questions of a Sensitive Nature

No data of a sensitive nature being collected.

A12. Hour Burden of Collection of Information

All of the hour burden for this study will fall on PGE schools to provide data for the study. No burden on students will be involved. Table A.3 shows our estimates of hour burden.

Estimated hour burden for PGE school data. The planned evaluation includes three types of data collection efforts from PGE schools (Table A.3).

The first is the effort to provide the evaluation contractor with lists of eligible candidates identified for the two experiments each week and the dates that consent materials were mailed. There are 28 PGE schools participating in Experiment 1 and 40 schools in Experiment 2. While some schools will participate in both, for the purposes of estimating burden we consider there to be a total of 68 PGE school experiments. Schools participating in Experiment 1 are expected to have an average of about 25 study participants while schools in Experiment 2 are expected to have an average of about 100 study participants. It is expected that the effort required to record and send the data to the evaluator on a weekly basis is 10 minutes per participant. For Experiment 1, this time equals 166.66 hours (28

school experiments x 25 participants per school x 10 minutes per participant divided by 60 minutes per hour). For Experiment 2, the comparable estimate of burden is 666.66 hours (40 schools x 100 participants per school x 10 minutes per participant divided by 60 minutes per hour).

The second data collection effort involves the recording of a limited amount of information about individuals in the study-specific random assignment database. It is expected that the processing time and effort required for data entry of sample members into the database is approximately 10 minutes per participant. Given the number of schools in each experiment and the expected number of participants at each school, as described above, for Experiment 1 the estimated time required equals 116.66 hours (28 school experiments x 25 participants per school x 10 minutes per participant divided by 60 minutes per hour). For Experiment 2, the comparable estimate of burden is 666.66 hours (40 schools x 100 participants per school x 10 minutes per participant divided by 60 minutes per hour).

The third type of data collection effort from PGE schools involves three waves of administrative data extraction. It is assumed that each extraction, regardless of the wave or the type of experiment in which a school participates, will take 8 hours. Hence, the total time for PGE schools in Experiment 1 to extract and process the administrative data records is 672 hours (28 schools x 3 extracts per school x 8 hours per extract). Similarly, the total time for PGE schools in Experiment 2 is 960 hours (40 schools x 3 extracts per school x 8 hours per extract).

Summing the total hours from the three different types of data collection processes for each experiment leads to burden estimates of 905.32 hours across 1,484 responses for Experiment 1, and 2,293.32 hours across 8,120 responses for Experiment 2. The total burden for PGE school data collection across both experiments equals 3,198.64 hours for 9,604 responses across 68 respondents (1,066.21 hours for 3,202 responses across 23 respondents annually).

Table A.3. Total Hour Burden Estimates for Experiments 1 and 2

Experiment	Number of PGE School Experiments	Number of Participants per PGE School	Frequency of Collection	Number of Responses	Average Processing Time	Burden (Hours)
Experiment 1						
List of Candidates and Date Consent Materials Mailed	28	25	Once per study participant	700	10 minutes per study participant	116.66
Data Entry into the Random Assignment Database	28	25	Once per study participant	700	10 minutes per study participant	116.66

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Extraction of School Enrollment Records	28	n.a.	3 extracts per school	84	8 hours per extract	672.00
Subtotal	28	n.a.	n.a.	1484	n.a.	905.32
Experiment 2						
List of Candidates and Date Consent Materials Mailed	40	100	Once per study participant	4,000	10 minutes per study participant	666.66
Data Entry into the Random Assignment Database	40	100	Once per study participant	4,000	10 minutes per study participant	666.66
Extraction of School Enrollment Records	40	n.a.	3 extracts per school	120	8 hours per extract	960.00
Subtotal	40	n.a.	n.a.	8,120	n.a.	2,293.32
Total for Both Experiments	68	25-100	n.a.	9,604	n.a.	3,198.64

n.a. = not applicable; PGE= Pell Grant Experiments.

Estimated cost burden for PGE school data. As shown in Section A.12, the estimated total hour burden for PGE school data collection is 3,198.64 (905.32 for Experiment 1 and 2,293.32 for Experiment 2). The average hourly wage, based on the Bureau of Labor Statistics (BLS) average hourly earnings of production and nonsupervisory employees on private, nonfarm payrolls, is \$19.42 (May 2011 Employment Situation Table B-8, Current Employment Statistics, BLS, U.S. Department of Labor). Multiplying the total number of hours by the average hourly wage yields a total cost estimate of \$62,119 (3,198.64 hours x \$19.42 per hour) or \$20,706.33 annually. Table A.4 provides separate cost burden estimates for Experiments 1 and 2 as well as the total combined cost estimate.

Table A.4. Total Cost Burden Estimates for Experiments 1 and 2

Data Collection Activity	Total Burden Hours	Average Hourly Wage	Total Cost
Experiment 1			
List of Candidates and Date Consent Materials Mailed	116.66	\$19.42	\$2,266
Data Entry into the Random Assignment Database	116.66	\$19.42	\$2,266
Extraction of School Enrollment Records	672.00	\$19.42	\$13,050
Subtotal	905.32	\$19.42	\$17,582
Experiment 2			
List of Candidates and Date Consent Materials Mailed	666.66	\$19.42	\$12,947
Data Entry into the Random Assignment Database	666.66	\$19.42	\$12,947
Extraction of School Enrollment Records	960.00	\$19.42	\$18,643

Data Collection Activity	Total Burden Hours	Average Hourly Wage	Total Cost
Subtotal	2,293.32	\$19.42	\$44,537
Total for Both Experiments	3,198.64	\$19.42	\$62,119

A13. Estimated Total Cost Burden for Collection of Information

There are no start-up costs for this collection.

A14. Estimated Annualized Cost to the Federal Government

The annualized cost to the Federal government for collecting, analyzing, and reporting on these data is \$367,918 (\$2,575,427 divided by seven years). In addition to the costs associated with collecting and analyzing the evaluation data, FSA will bear some costs because they will have to pay their contractor to write and execute queries to the National Student Loan Data System to allow for extraction of appropriate data to manage the two demonstration programs.

A15. Changes in Burden

There is an overall reduction in burden from the currently approved collection for this evaluation as a result of removing the student survey from the collection (due to low response rates). This revision of the currently approved collection decreases total respondent burden for the data collection.

A16. Publication Plans and Project Schedule

The final publication plans are presented in Table A.9, which shows the project schedule for the specific data collection activities for which clearance is requested, as well as for those that impose no new burden. The table also includes expected dates for the interim and final reports for the PGE study. The time lines are considered preliminary.

Table A.5. Preliminary Project Schedule of Activities

Activity	Time Frame
Study Participant Enrollment	November 2012 - June 2016
Expected Program Completion Period	Spring 2013 - June 2018
FSA Data Extraction	Summer 2015, 2017, and 2018
Data Extracts from PGE Schools	Summer 2015, 2017, and 2018
SSA Data Analysis	August 2018 through December 2018
Final Report	Spring 2019

FSA = Federal Student Aid office; PGE = Pell Grant Experiments; SSA = Social Security Administration.

A17. Reasons for Not Displaying Expiration Date of OMB Approval

The expiration date for OMB approval will be displayed on all forms associated with this data collection.

A18. Exception to the Certification Statement

Exception to the certification statement is not requested for the data collection.

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