

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

Full Scale Student Records Abstraction Form
and Student Interview

Supporting Statement Part A

(OMB # 1850-0666 v. 17)

Submitted by
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Contents

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

B. Collection of Information Employing Statistical Methods & References

C. References

Appendixes

- A. Technical Review Panel Members
- B. Endorsing Organizations for NPSAS:16
- C. Confidentiality for Administrative Record Matching
- D. Respondent Communication Materials – Institutions and Students
- E. Student Records Instrument Facsimile
- F. Student Interview Facsimile

Tables

	Page
Table 1. Chronology of NPSAS and its longitudinal components.....	3
Table 2. Maximum estimated burden to respondents for the NPSAS:16 data collections.....	11
Table 3. Maximum estimated time burden cost to respondents for the NPSAS:16 data collections.....	12
Table 4. Individual and total costs to NCES for the NPSAS:16 field test and full-scale implementations.....	12
Table 5. Contract costs for NPSAS:16.....	13
Table 6. Operational schedule for NPSAS:16.....	13

A. Justification

1. Circumstances Making Collection of Information Necessary

a. Purpose of this Submission

This document supports the clearance of materials and procedures for student records abstractions and student interviewing for the full scale of the 2015-16 National Postsecondary Student Aid Study (NPSAS:16). 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, Ms. Alisa Cunningham, and Dr. Stephen Porter.

This submission covers NPSAS:16 full scale materials and procedures required for student record abstractions, student surveying, and matching data to administrative files. NCES received approval of a separate clearance package covering institution sampling and enrollment list collection in July and October 2015 (OMB# 1850-0666 v.15-16). The materials to be used in the full scale NPSAS collection are based upon those that were approved for the field test (OMB# 1850-0666 v.12-14). With those submissions, NCES adequately justified the need for and overall practical utility of the full study, an overarching plan for all phases of the data collection, and provided as much detail on the measures to be used as was available at the time of the submission. As part of the field test submission, NCES published a notice in the Federal Register allowing first a 60- and then a 30-day public comment period. For this submission, NCES published 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 described in this submission.

NPSAS:16 is a nationally representative study of how students and their families finance education beyond high school. The first NPSAS was 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 focused on 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 requirements for 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 membership list of the Technical Review Panel (TRP) for the student data collection component of NPSAS:16 (appendix A);
- A list of endorsing institutions and associations supporting NPSAS:16 (appendix B);

- A description of the confidentiality procedures in place for the administrative record matching (appendix C);
- Contacting materials for institution staff providing student records and sample members selected for participation in the student survey (appendix D); and
- Facsimiles of the student records abstraction form (appendix E) and the student interview (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. § 9543) 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 not on a traditional calendar system (primarily vocational institutions), 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 is provided 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 increasing demand 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 institutions. In addition, NPSAS:12 was the first cycle to use current-year 12-month institutional enrollment data to ensure more accurate poststratification (weighting) than was achieved 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 enrolled for 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
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	Administrative data matching only
NPSAS:2000	B&B:2000/01	—	—
NPSAS:04	BPS:04/06	BPS:04/09	Administrative data matching only
NPSAS:08	B&B:08/09	B&B:08/12	B&B:08/18 (anticipated)
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.

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 multiple publications, including: a First Look report; four Web Table publications covering student aid by institutional sector, a profile of undergraduates, undergraduate financing, and a profile of graduate students, including education financing beyond the bachelor's degree; and a *Statistics in Brief* report, which describes the total price of attendance for undergraduates, net price after grant aid, and the "out-of-pocket" net price.

The data can be used to calculate statistics with PowerStats, QuickStats, and TrendStats, 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, with a special emphasis on students considering and pursuing careers in elementary and secondary teaching.

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 be used to support experimental research funded by NCER. Interested researchers have been asked to submit a proposal detailing their experimental design and analysis plans. Upon grant review and approval, RTI will carry out any needed data collection and/or file-matching activities and deliver a restricted data file to NCES to provide to the grantee for analysis. Currently, proposals are due to NCER on August 6, 2015, and awards are expected in early summer 2016.

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 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 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?

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. 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 Education Analysis Resources (PEAR) series.

c. Study Design for NPSAS:16

Data for NPSAS:16 will be collected from both postsecondary institutions and students. The target population includes all students enrolled in a sample of institutions for the 2015–16 academic year. A stratified sample of students within the sampled institutions will be selected. Institutions will be asked to provide information from student financial aid records and other institutional sources. Much of the required student financial aid data contained in institutional records is also available in the Central Processing System (CPS), which houses and processes data contained in the Free Application for Federal Student Aid (FAFSA) forms. These data will be obtained through file matching/downloading with this system. The process reduces the data collection burden on sampled institutions. As in NPSAS:12, institutions will be asked to verify institutional characteristics and financial aid program participation and to provide enrollment lists for sampling purposes. Data from students will be collected via a self-administered survey on the Internet or through web-based CATI.

Additional data for the NPSAS:16 student sample will be obtained from a variety of administrative data sources. These include, as described above, queries of CPS, plus the National Student Loan Data System¹ (NSLDS) containing Pell loan and grant files, the National Student Clearinghouse (NSC), and vendors of national undergraduate, graduate, and professional student admission tests including ACT and SAT scores. A description of the confidentiality procedures in place for administrative record matching is provided in appendix C.

3. Use of Information Technology

Both the institution and student websites for data collection will reside on NCES' SSL-encrypted servers. On a nightly basis, the data collection contractor, RTI, will download student record and interview data, in batches, to their Enhanced Security Network (ESN) via a secure web service. Once in the ESN, data will be cleaned and undergo quality analysis.

Student record data can be provided by either direct data entry or data upload to the NPSAS:16 institution website. Secure Sockets Layer (SSL) protocol is used to encrypt the data transmitted over the Internet, and data entry modules are password-protected. The forms that gather data on this website will require session cookies to run in accordance with the U.S. Department of Education's privacy policy for the use of cookies. The most recent versions of Microsoft Internet Explorer,

¹ NCES and FSA have been in discussions about the potential use of the Enterprise Data Warehouse and Analytics application for future matching.

Google Chrome, and Mozilla Firefox allow for rejecting all cookies other than those required for session tracking.

To improve its efficiency, the NPSAS:16 student interview will use web-based questionnaires across two modes of data collection, a self-administered survey, which is mobile-friendly to allow completion of the full survey on a tablet or smartphone, and computer-assisted telephone interviewing (CATI). In the NPSAS:16 field test, 65.9% of surveys were completed on personal computers and 23.6% on handheld devices.

4. Efforts to Identify Duplication

Efforts to identify duplication have included NCES consultations with other federal offices, such as the U.S. Department of Education's Office of Postsecondary Education; the Office of Planning, Evaluation and Policy Development; and other agencies, such as the Government Accountability Office; the Congressional Budget Office; and the Office of Management and Budget. In addition, NCES collaborates with the National Center for Science and Engineering Statistics (NCSES) at the National Science Foundation (NSF) to ensure that each unit is kept up-to-date on each other's studies pertaining to postsecondary students and institutions. NCES and NSF meet on a regular basis to cover topical issues relevant to both offices and each has staff serving on study technical review panels. NCES 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 data collected through NPSAS are not available from any other sources. NCES also consults with academic researchers, several of whom attend the NPSAS Technical Review Panel meetings. 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 data collected through NPSAS will meet the needs of the federal government and relevant organizations. No studies in the U.S duplicate the data produced by NPSAS.

5. Method Used to Minimize Burden on Small Businesses

For-profit and other, small private not-for-profit and public institutions will be asked to provide student record data. To minimize burden on these institutions, NPSAS:16 will offer a choice of three methods for submitting the requested data: (1) uploading electronic files to the project's secure website (a total of four files will be created); (2) downloading an Excel workbook from the project's web site, then uploading the completed file to the site; and (3) use of a web-based data entry interface. An institution may select the most convenient and least burdensome format(s) for their staff and recordkeeping system.

The student survey does not involve small businesses or entities.

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 like 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 NSF, OMB, and CBO; and non-federal members who are considered experts in postsecondary education issues, including financial aid (a list of the TRP members is provided in appendix A). Four technical review panel meetings have been held to inform the NPSAS:16 data collection, including the most recent meeting in August 2015, during which results of the field test and review plans for the 2016 full-scale study design were presented and discussed.

9. Provision of Payments or Gifts to Respondents

No payments or gifts to responding institutions will be given.

The use of incentives for completion of the student interview can provide significant advantages to the government in terms of increased overall student response rates, timely data collection, and reduction of nonresponse bias. In addition, the use of incentives may also result in decreased data collection costs. Therefore, in an effort to maximize participation of students, use of incentives is proposed for two purposes – to encourage early response using the self-administered web survey and to minimize nonresponse through refusal conversion.

All cases will be offered an incentive of \$30, paid upon completion of the survey by the sample member's choice of check or PayPal (an online money transfer service;

about 35% of respondents opted for PayPal during the NPSAS:16 field test). The \$30 amount has been offered in NPSAS full-scale collections since NPSAS:04.

10. Assurance of Confidentiality

NCES assures participating individuals and institutions that all identifiable information collected under NPSAS and related programs may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law [Education Sciences Reform Act of 2002 (ESRA), 20 U.S.C. § 9573]. NPSAS:16 data security and confidentiality protection procedures are in place to ensure that RTI and its subcontractors comply with all privacy requirements, including:

- The Statement of Work of this contract;
- Privacy Act of 1974 5 U.S.C. § 552(a);
- 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 (FERPA) of 1974, 20 U.S.C. § 1232(g);
- ESRA, 20 U.S.C. § 9573; and
- All new legislation that impacts the data collected through this contract.

RTI will 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.

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 NSC which has its own secure FTP site. All data transfers will be encrypted. Study notification materials sent to institutions for student records will describe the voluntary nature of NPSAS:16 and convey the extent to which respondent identifiers and all responses will be kept confidential.

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.

Regarding file matching with administrative sources, the Family Educational Rights and Privacy Act (FERPA) (34 CFR Part 99) allows the disclosure of information without prior consent for the purposes of NPSAS:16 according to the following excerpts: 34 CFR § 99.31 asks, "Under what conditions is prior consent not required to disclose information?" and explains in 34 CFR § 99.31(a) that "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 several conditions. These conditions include, at 34 CFR § 99.31(a)(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, 34 CFR § 99.31(a)(6)(v) 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 34 CFR § 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).

In 34 CFR § 99.31 (a)(6)(iii), FERPA 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 Part 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 the contract with RTI, 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 and grants received by students. Students generally tend not to be 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 obtaining the same data by administering a questionnaire.

11. Sensitive Questions

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

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

Social Security Numbers (SSNs) will be needed to 1) conduct file matches to administrative records and 2) maintain the sample for the B&B longitudinal study. File matching to administrative records is a crucial element of the NPSAS study and would not be possible without the collection of SSNs. Data obtained from file matching will both minimize respondent burden and increase data quality.

12. Estimates of Response Burden

Table 2 provides the projected estimates for response burden for the student data collections for NPSAS:16, which are based on experiences from prior rounds of NPSAS, including the field test. Using time burden data for similar institutional data collection tasks, we estimate the average burden associated with the student records collection to be approximately 22 hours per institution. The estimated hourly cost to institutions was raised to \$38, adopted from the recent IPEDS collection, to reflect salary increases at those institutions. The total estimated cost to all institutions participating in the NPSAS:16 full scale student record data collection for the 35,876 total burden hours is \$1,363,288. We expect the student interview to require approximately 25 minutes, on average, for completion. Estimating an average hourly rate of \$18 for participating students, the 35,000 total burden hours will cost all students about \$630,000.

Table 2. Maximum estimated burden to respondents for the NPSAS:16 full-scale data collections

Data collection activity	Sample³	Expected eligible	Expected number of respondents	Expected number of responses	Expected response rate (percent)	Average time burden per response (mins)	Total time burden (hours)
<i>Institutional Collection¹</i>							
Eligibility screening calls	2,000	1,980	2,000	2,000	100	5	167
Institutional registration page	†	1,980	1,683	1,683	85	5	140
Institutional enrollment lists	†	1,980	1,683	1,683	85	165	4,628
Total				5,366			4,935
<i>Student Collection</i>							
Student record collection ²	1,683	1,683	1,616	1,616	96	1,332	35,876
Student interview	126,316	120,000	84,000	84,000	70	25	35,000
Total			86,000	90,982			75,811

† Not applicable.

* Duplicative counts of respondents, but not of responses.

¹ The Institutional Collection burden was approved in July and October 2015 (OMB# 1850-0666 v.15-16) and is being carried over in this package.

² "Sample" is the number of institutions that provided enrollment lists for student sampling with an average of 30 students expected per institution.

³ The starting sample is the difference between the sample size for the student record collection and the number of eligible institutions selected.

Table 3. Maximum estimated time burden cost to respondents for the NPSAS:16 data collections

Data collection activity	Average time burden per response (mins)	Total time burden (hours)	Rate per hour	Total cost
<i>Institutional Collection</i>				
Eligibility screening calls	5	167	\$38	\$ 6,346
Institutional registration page	5	140	38	5,320
Institutional enrollment lists	165	4,628	38	175,864
Institution Collection Total				\$187,530
<i>Student Collection</i>				
Student record collection	1,332	35,876	38	\$ 1,363,288
Student interview	25	35,000	18	630,000
Student Collection Total		75,811		\$1,993,288

¹ The total cost to respondents for institution data collection is based on the estimated response burden (hours) multiplied by \$38, which includes average data analyst and associated computer costs for running programs to extract data.

² The total estimated cost to respondents for student data collection is based on the estimated response burden (hours) multiplied by \$18, which was obtained by taking the average of the median weekly earnings of full-time wage and salary workers among high school graduates with no college and individuals with some college or an associate's degree. (Table 5, <http://www.bls.gov/news.release/pdf/wkyeng.pdf>.)

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 4.

Table 4. 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 cost estimates are staff time, reproduction, postage, and telephone costs associated with the management, data collection, analysis, and reporting for which clearance is requested (costs shown are for the entire full-scale data collection, including institution and student data collection efforts). Table 5 provides a more detailed breakdown of contract costs.

15. Reasons for Changes in Response Burden and Costs

The apparent increase in burden is due to the fact that the last approval was for the NPSAS:16 full-scale institution contacting and list collection only, while this request is for all aspects of the full scale data collection from institutions and students.

16. Publication Plans and Time Schedule

The operational schedule for the NPSAS:16 full-scale study is shown in table 6. 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, and is the basis for TrendStats, which allows users to analyze data across NPSAS administrations with optional automatic inflation adjustments for dollar values;
- Special tabulations of issues of interest to the higher education community, as determined by NCES.

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.

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.

Table 5. 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
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

Table 6. Operational schedule for NPSAS:16

NPSAS:16 activity	Start date	End date
Full-scale study		
Contacts with institutions to request enrollment lists	Oct. 6, 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