

NCER-NPSAS Grant Study
Connecting Students with Financial Aid (CSFA) 2017: Testing
the Effectiveness of FAFSA Interventions on College
Outcomes

Supporting Statement Part A
OMB # 1850-New v.1

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

October 2016
revised December 2016

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A. Justification

Background for NCER-NPSAS Grant Program

In 2010, the National Center for Education Research (NCER) and the National Center for Education Statistics (NCES), both within the U.S. Department of Education's Institute of Education Sciences (IES), began collaborating on an education grant opportunity related to the cross-sectional National Postsecondary Student Aid Study (NPSAS). NPSAS identifies a large, nationally-representative sample of postsecondary institutions and students to collect student-level records on student demographics and family background, work experience, expectations, receipt of financial aid, and postsecondary enrollment (see <http://nces.ed.gov/surveys/npsas/about.asp>; OMB# 1850-0666). Since 1987, NPSAS has been fielded every 3 to 4 years, most recently during the 2015–16 academic year. Alternating cycles of NPSAS spin off a cohort for the follow-up Beginning Postsecondary Students Longitudinal Study (BPS) or the Baccalaureate and Beyond Longitudinal Study (B&B). In previous cycles of NPSAS, researchers have expressed interest in using NPSAS as a way to conduct interventions and experiments on a national sample. The goal of the NCER-NPSAS grant opportunity collaboration is to provide researchers with the possibility of developing unique research projects pertaining to college persistence and completion that utilize a subset of the NPSAS sample that is not already set aside for one of the NPSAS-based longitudinal studies (BPS or B&B).

While the nature of these grant projects puts them outside the mission of NCES, they fit appropriately under NCER, which funds scientifically rigorous field-generated research that is intended to improve the quality of education, increase student academic achievement, reduce the achievement gap between high- and low-performing students, and increase access to and completion of postsecondary education. Under the NCER-NPSAS grant opportunity, researchers can submit applications to the Postsecondary and Adult Education topic within the Education Research Grants program (CFDA 84.305A), under either the Exploration or Efficacy and Replication research goal. Consistent with these two goals, NCER supports research projects using NPSAS to: (1) explore relationships between malleable factors (e.g., information on benefits of financial aid and FAFSA renewal) and postsecondary persistence and completion, as well as the mediators and moderators of those relationships; and (2) evaluate the efficacy of interventions aimed at improving persistence and completion of postsecondary education (e. g., financial aid and FAFSA renewal advice delivered via text messaging). Researchers approved for funding through this program can obtain indirect access to a subsample of the national NPSAS sample (after the study's student interviews are completed) in order to conduct unique research projects that adhere to the guidelines set forth in the Request for Applications (RFA) for the Education Research Grants Program, as well as guidelines set forth by NCES and the NPSAS program.

The FY 2016 competition for the Education Research Grants program was first announced through a Federal Register notice on April 15, 2016 (see Applications for New Awards; Education Research and Special Education Research Grant Programs: <https://www.federalregister.gov/documents/2015/04/15/2015-08627/applications-for-new-awards-education-research-and-special-education-research-grant-programs>). Subsequent to the Federal Register notice, NCER and NCES staff announced the NCER-NPSAS grant opportunity at

conferences and meetings, through an email announcement sent out to the research community via the IES NewsFlash service, and via an e-mail-based alert service designed to inform users about all new content posted to the IES website. The NewsFlash provided a link to the NPSAS-Specific Requirements for Applications Using the National Postsecondary Student Aid Study page, which includes the requirement for OMB clearance: <http://nces.ed.gov/surveys/npsas/grant/NPSAS-Specific.asp>. An additional Application Process page (<http://nces.ed.gov/surveys/npsas/grant/application.asp>) required researchers to provide NCES with a 3-5 page research synopsis describing the purpose of the research, research questions, target population and needed sample, research design, data collection strategy, analysis plan, and timeline. In addition, the Application Process page required applicants to provide an estimated budget and the Principal Investigator's (PI) curriculum vitae. This information allowed NCES to evaluate the projects for technical acceptance to determine whether the proposed work would (1) be feasible within the constraints of NPSAS:16 and (2) meet the guidelines set forth in the NCES Statistical Standards. Upon review, NCES provided the researchers with a letter indicating whether or not the project was technically acceptable.

The projects that NCES determined to be technically acceptable were sent to the NPSAS:16 data collection contractor, RTI International, to obtain a technical proposal and a cost proposal that estimated the contractor's data collection costs. The FY 2016 RFA for the Education Research Grants program required applicants to the NCER-NPSAS opportunity to include both the letter of technical acceptance from NCES and RTI's technical and cost proposals along with a complete application to NCER's Education Research Grants program (84.305A). Applicants were required to submit the full application package to IES via www.Grants.gov by August 6, 2016. Once the competition closed, the IES Standards and Review Office (SRO) reviewed the applications for responsiveness to the FY 2016 Education Research Grants RFA, and forwarded the responsive applications for peer review as part of SRO's FY 2016 applications review process. The responsive NCER-NPSAS applications were reviewed in February 2016 by the Systems and Broad Reforms panel, a peer review panel of experts including postsecondary researchers, methodologists, and policy analysts. Since the inception of the NCER-NPSAS grant opportunity in 2010, grant applications have been submitted to use the NPSAS:12 and the NPSAS:16 samples. No awards were made to use the NPSAS:12 sample, but the following two awards were made to use the NPSAS:16 sample (announced July 1, 2016):

- Financial Aid Nudges: A National Experiment to Increase Retention of Financial Aid and College Persistence (see <http://ies.ed.gov/funding/grantsearch/details.asp?ID=1848> for project description) , and
- Could Connecting Students with Financial Aid Lead to Better College Outcomes? A Proposal to Test the Effectiveness of FAFSA Interventions Using the NPSAS Sample (referred to as "Connecting Students with Financial Aid (CSFA) 2017") (see <http://ies.ed.gov/funding/grantsearch/details.asp?ID=1853> for project description).

The NCER-NPSAS grant program requires substantial coordination between NCER, NCES, RTI, and the grant recipients (grantees). NCER monitors the grant research to ensure that it is implemented consistently with the scope of activities presented in the

grant application. The expected products and a timeline for key tasks (benchmarks) are codified in a Performance Agreement shortly after the grant award is made. The grant monitoring process, however, allows for the grantee to negotiate with the IES program office changes to a project's objectives, benchmarks, and timeline. NCER also monitors grantees to ensure that they obtain certification from the appropriate Institutional Review Board (IRB) or Boards to carry out research involving non-exempt human subjects. NCES' role is to ensure that the confidentiality of the NPSAS sample members is protected, including ensuring that proper data security protocols are in place and that NCES Statistical Standards are met. In addition, NCES will make the collected data available to the grantee under NCES's restricted-use licensing program. RTI has direct access to the NPSAS sample members and will lead all data collection activities. RTI is operating under a subcontract from the grantee, as funded by the NCER-granted funds. RTI is responsible for sample selection, respondent contacting and follow-up, data collection and processing, and weighting of the data (if applicable). RTI's costs were included in the budget for the grant application. The grantee is responsible for research design, data analysis, and dissemination of results.

Once all data are collected and processed by the contractor, the grantee must apply for the NCES restricted-use data license in order to gain access to the collected data, which are the property of NCES and loaned to the grantee exclusively until the end of the grant period or until the grantee has published the main research paper (whichever comes later). As is the case with all NCES restricted-use data files (RUF), no personally identifying information will be contained on the dataset. Information on the restricted-use data license is available at <http://nces.ed.gov/pubsearch/licenses.asp>. Grantees must adhere to all NCES Statistical Standards in data analysis and diffusion (see <http://nces.ed.gov/statprog/2012/>). After having received the restricted-use data license, grantees will be provided with the collected data. However, no grant-funded raw data shall be released to any party other than NCES and RTI (the latter as the primary contractor for NPSAS:16; contract# ED-IES-13-C-0070). Upon the grant expiration date or after the grantee has published the main research paper (whichever comes later), NCES will make the data available to a wider audience as RUF, assuring all NCES Statistical Standards are met.

1. Circumstances Making Collection of Information Necessary

This request is to conduct the NCER- NPSAS Grant Study - Connecting Students with Financial Aid (CSFA) 2017: Testing the Effectiveness of FAFSA Interventions on College Outcomes, which is a study of the effectiveness of an intervention that will provide financial aid information and reminders to college students who were initially interviewed as part of NPSAS:16. This research is being conducted under a grant awarded through the NCER-NPSAS grant opportunity described above. The primary grantee is Bridget Terry Long, Harvard University (Grant Award #R305A160388) with co-principal investigator Eric Bettinger, Stanford University. Data collection will be led by the contractor, RTI International (RTI).

In addition to the study's description in the Supporting Statement Part A and B, this submission includes:

- Contacting materials for the interventions (appendix A);
- Survey communication materials (appendix B);

- The survey instrument (appendix C); and
- A description of the confidentiality procedures in place for record matching to the Central Processing System, National Student Loan Data System, and National Student Clearinghouse (appendix D).

In December 2016, the study team conducted focus groups to determine whether the language of the intervention letters and emails is understandable to a group of college students from a variety of schools (1850-0803 v.184). In response to the feedback from the focus groups, the wording of the intervention letters and emails has been revised and replaced in this submission. In addition, cognitive interviews on the survey items will be conducted in March 2017 to examine whether college students correctly understand the question wording and whether their answers get adequately captured in multiple-choice questions. The request to conduct cognitive testing will be submitted to OMB for review under the NCES generic clearance for pretesting (OMB# 1850-0803). With input from cognitive interviews, we expect to finalize the CSFA survey in April 2017. Any changes to the survey will be submitted to OMB for review in 2017 with the goal of implementing the survey beginning in October 2017.

2. Purposes and Uses of the Data

a. Purposes of the *Connecting Students with Financial Aid (CSFA) 2017 Study*

This study aims to capitalize on a unique opportunity provided by NCES, in which a subset of the nationally representative sample from NPSAS:16 is being made available for intervention and experimentation under the guidelines of the special call for proposals described above. This will allow grantees to examine, using the student subsample, a set of interventions designed to maximize FAFSA submission and renewal, as well as encourage better-informed course-enrollment with more generous financial aid. The interventions involve sending information on the financial aid application process to randomly assigned student samples, and connecting them to aid resources. Grantees hypothesize that, by improving the information students have and simplifying the steps towards completing the FAFSA, aid receipt will improve. In turn, this will help to improve college persistence, the likelihood of degree completion, and other postsecondary outcomes, such as academic performance.

b. Research and Policy Issues

While college enrollment rates have risen steadily over the past several decades, there is increasing attention to the problems of student attrition and low levels of degree completion. Overall, only about half of college students complete their intended degree (U.S. Department of Education, 2015). Graduation rates are particularly troublesome for low-income students. Adelman (2006) found that only 36 percent of low-income students who were academically qualified for college completed a bachelor's degree within eight years, while 81 percent of high-income students did so. Persistence and degree completion rates are especially low at broad-access, four-year institutions and community colleges, which do not have major admissions requirements. Only 34 percent of students who enrolled at open admissions, four-year institutions graduate within 6 years, and the rate of completion of associates degrees within three years is even lower (29.4 percent) for community college students (U.S. Department of Education, 2015). Therefore, while supporting college access remains a

national goal, more effort is now being focused on improving college student success and graduation rates.

Financial aid has long been an important lever in the quest to improve college outcomes. There is a long literature documenting how financial aid grants can encourage college enrollment (see reviews by Dynarski and Scott-Clayton, 2013; Bettinger, 2012; Deming and Dynarski, 2010; Long, 2007). More recently, research has started to provide evidence that financial aid can also improve the chances of postsecondary persistence and degree completion. In a study focusing on a need-based grant in Florida, the *CSFA 2017* study PI and a co-author found that eligibility for the Florida Student Access Grant (FSAG) not only increased the probability of college enrollment but also persistence and degree completion. Using a regression discontinuity design meant to establish causal relationships, they estimated that the probability of staying continuously enrolled through the spring semester of students' first year increased by 4.3 percentage points for students eligible for the FSAG (from a baseline mean of 55 percent). They also found that eligibility for the \$1,300 FSAG grant (in 2000 dollars) increased the probability of earning a bachelor's degree within six years by 4.6 percentage points (from a baseline mean of 21 percent ; Castleman and Long, 2016). Other work by Goldrick-Rab, Kelchen, Harris, and Benson (2016) and Bettinger (2015) also suggests that need-based financial aid can improve college completion rates.

Research on merit-based aid has also identified the positive effects of scholarships on educational attainment. For example, Dynarski (2008) found that the introduction of state merit scholarships in Arkansas and Georgia led to increases in the share of the population in each state with college degrees within 10 years of when the programs were introduced. Scott-Clayton (2011) found that students, just above the score cut-off that determined whether they were eligible for the West Virginia PROMISE scholarship, were 6.7 percentage points more likely to earn a bachelor's degree within four years and 4.5 percentage points within five years, than students just below the eligibility threshold who presumably had similar levels of academic preparation and performance.

While the previous literature highlights the potential for financial aid to improve outcomes such as college student access, persistence, and degree completion, research also highlights that the current financial aid system is broken due to low levels of awareness of aid availability and the complex processes and applications for aid. Surveys suggest that many families know little about financial aid, from the types of aid available to the way to apply for it (Kane and Avery, 2004; Horn, Chen, and Chapman, 2003; ACSFA, 2008). Related research has shown that the federal aid application barrier is especially challenging for many families, especially those from low-income backgrounds (Bettinger, et al., 2012). Such evidence has led many to conclude that financial aid policies are not as effective as they could be due to this complexity (Dynarski and Scott-Clayton, 2006). These findings are underscored by the fact that financial aid programs that are simple to access and well known among eligible families have the largest estimated effects on college outcomes (Long, 2010). As such, providing families with information about and assistance with financial aid holds promise as a way to improve the functioning of the financial aid system and raise student outcomes. Recent work suggests that such approach can be effective

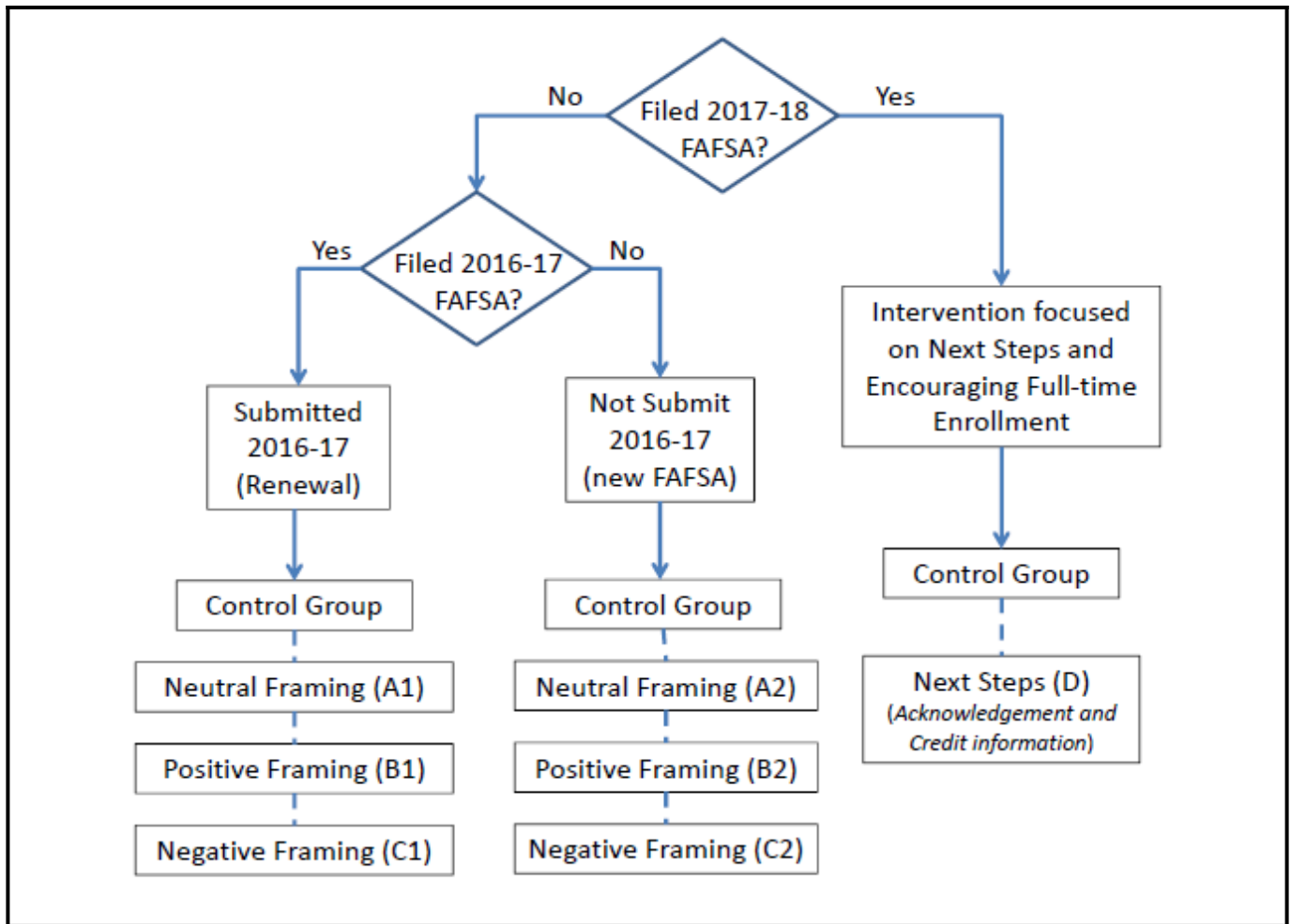
among some students (for example, Hoxby and Turner, 2012). The current NCER-NPSAS grant project builds upon this work, as well as the grantees' own previous research, with the goal of establishing the effects of providing current college students with better guidance about financial aid.

c. Study Design

Data for this study will be collected from a subsample of NPSAS:16 respondents and from administrative records. The target population includes a subset of NPSAS:16 respondents who were first, second, and third year college students during the 2015-16 academic year and who gave their consent in the NPSAS:16 interview to be contacted for an external research study. Data will be captured from a survey conducted in the fall 2017, following the interventions described here.

This study will implement a set of interventions related to the lack of awareness about financial aid and examine the effects of those interventions on key outcomes. Working with RTI, the contractor who collected the NPSAS:16 data, grantees will implement a set of randomized-controlled trials focused on students attending two- and four-year institutions who, at baseline (during NPSAS:16 data), were in their first through third year of college. While most financial aid efforts focus on potential students who are only considering college, navigating the financial aid process can be extremely difficult even for those who are already attending. By helping students maximize the resources available to them, the design is intended to help improve students' filing and refiling for financial aid, credit levels, persistence, and degree attainment.

Table 1. Depiction of the sample design for the *Connecting Students with Financial Aid (CSFA) 2017* study



The sample design for the *CSFA 2017* study is provided in table 1. The sample will be split into two groups: students who have not submitted a FAFSA for 2017-18 and students who have already submitted the FAFSA for 2017-18. Those who have not already filed for 2017-18 will be further divided by their 2016-17 FAFSA status – filed or not filed. Students will then be randomly assigned into one of four groups that will receive differently worded information on FAFSA filing and refiling: neutral framing, positive framing, negative framing, and a control group, which will not receive any information prior to the survey. All letters include information on the benefits of enrolling for more credits per term. Students who have already filed a FAFSA for 2017-18 will be divided randomly into one of two groups: (1) one receiving a neutrally-framed letter with information on next steps and with facts on the benefits of enrolling for more credits, and (2) a control group.

Information conveyed in neutral framing will be provided as straightforward facts (e.g., “To get financial aid, you must complete the FAFSA.”), while the positive framing will emphasize how much the student could gain (e.g., “You could receive up to \$5000 in Pell Grants.”). Negative framing, in contrast, will present information about how much the student would lose by not applying for aid (e.g., “If you do not complete the FAFSA, you will be responsible for the full cost of college.”).

To better understand how students navigate financial aid and learn more about their knowledge and experiences applying for financial aid, all students selected for this study will be surveyed in the fall of 2017, after the intervention period (January to May

2017) concludes. Contacting materials for the survey and the survey content are provided in appendixes B and C, respectively. In addition to the survey, outcomes of the interventions will be determined by matching to administrative databases. In addition to matching to the CPS during the intervention period described above, RTI will conduct matches to CPS to determine whether or not participants apply for federal financial aid. Long-term financial aid data will be collected from the National Student Loan Data System (NSLDS), and enrollment and degree attainment data will be collected from the National Student Clearinghouse (NSC). Follow-up matching with these sources will continue through the 2019-2020 academic year.

3. Use of Information Technology

The interventions will be delivered to study participants in the treatment groups via hardcopy and electronic mail. In the fall of 2017, a survey will be administered to all study participants. They will be given the option of completing the survey on paper or online. The online survey will be programmed using Voxco, a commercially-available data collection and survey management software system that runs from inside the Enhanced Security Network at RTI and, therefore, maintains NIST-moderate security. Hardcopy mailings and emails will prompt all participants to complete the survey. Additional data for study participants will be obtained by matching to administrative data sources. These include, as described above, queries of the CPS, NSLDS (containing Pell loan and grant files), and the NSC. A description of the confidentiality procedures in place for administrative record matching is provided in appendix D.

4. Efforts to Identify Duplication

The current NCER-NPSAS grant project builds upon previous research showing that providing families with high-quality information about financial aid increases financial aid receipt and enrollment in college (Hoxby and Turner, 2012), and that students and families often do not understand rules pertaining to financial aid eligibility (Hoxby and Turner, 2015). As part of the NCER-NPSAS grant competition, the expert peer-review panel was aware of the related body of literature and NCER reviewed literature on informational interventions in an effort to identify duplication. The results of the review found no other study to date that has examined the impacts of an informational FAFSA-renewal intervention, or an informational intervention aimed at getting students to take more credits, at the national level. Most prior research has focused on helping students to access financial aid at the beginning of college, rather than focusing on FAFSA re-renewal. In addition, NCER has not funded any other grants or replication studies like this one.

5. Method Used to Minimize Burden on Small Businesses

This NCER-NPSAS grant study does not involve data collection from any small businesses or entities.

6. Frequency of Data Collection

Treatment group members will be contacted up to four times over the course of the intervention, from late January 2017 through May 31, 2017. Before each intervention letter is sent, which will happen approximately a month apart, the student's application status for the 2017-18 FAFSA will be checked. If they have already

completed the FAFSA, then the student will only get one more hardcopy and one more email letter confirming submission of the FAFSA (see the “already submitted” intervention letters). Therefore, some students will not be contacted four times. RTI will send students letters and emails with information about completing their federal aid application (FAFSA) and provide links to existing websites available to all students needing assistance with the FAFSA. During the intervention period, participants will be matched to CPS one time per month to determine application status, which will, in turn, determine the appropriate content of the messages. To gather data on students’ experiences with those treatments and subsequent enrollment, students will be surveyed one-time only beginning in September 2017. To encourage participation in the survey, RTI will mail up to three hardcopy mailings and send multiple email messages over the course of the 14-week data collection period. The CSFA 2017 sample will be matched to CPS and NSLDS one time per year from 2016 to 2020, and to the NSC one time in 2019. If a student is no longer enrolled, matching will still occur to determine if he/she returns to postsecondary study during the CSFA study period.

7. Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

8. Consultants outside the Agency

The Principal Investigator and co- Principal Investigator for this funded research project (R305A160388) have been researching and publishing on the topic of financial aid and FAFSA completion for over 15 years each. The research team developed their research design independently of NCEs, and relied on literature reviews and their own prior research. In addition, for NPSAS:16, several strategies were incorporated into the project work plan that allowed for the critical review and acquisition of comments relating to project activities, interim and final products, and projected and actual outcomes. These strategies included consultations with persons and organizations both internal and external to NCEs, the U.S. Department of Education, and the federal government. NPSAS:16 and previous NPSAS cycles 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.

One public comment was received during the 60-day public comment period announced for this submission in the Federal Register (Vol. 81, No. 203, pp. 72582-72583; correction in Vol. 81, No. 213, p. 76569). Due to its personal nature, the comment did not warrant a revision or response.

9. Provision of Payments or Gifts to Respondents

All study participants will be offered an incentive of \$30 to be paid upon completion of the survey by the sample member’s choice of check or PayPal (an online money transfer service; about 41 percent of respondents are opting for PayPal during NPSAS:16). The \$30 amount has been offered in NPSAS full-scale collections since NPSAS:04 and will be considered instrumental in encouraging students to participate and to complete the survey at the end.

10. Assurance of Confidentiality

Work with personally identifiable information (PII) under this NCER-NPSAS grant award will only be conducted through the NPSAS:16 data collection contractor. The subsample of NPSAS:16 participants selected for this NCER-NPSAS grant study will have the same assurance of confidentiality as was provided under the NPSAS:16 data collection. The assurances for NPSAS:16 are presented below.

NCES assures participating individuals and institutions that all identifiable information collected under NPSAS and related programs may be used only for statistical or research 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 Rights 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 complies 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 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 included 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 continues to follow 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 also security measures in place to protect data during file matching

procedures planned for the NCER-NPSAS grant studies. NCES has a secure data transfer system, which uses Secure Socket Layer (SSL) technology, allowing the transfer of encrypted data over the Internet. The NCES secure server will be used for all administrative data sources with the exception of the National Student Clearinghouse (NSC), which has its own secure FTP site. All data transfers will be encrypted.

The Department has established a policy regarding the personnel security screening requirements for all contractor employees. RTI must comply with these personnel security screening requirements throughout the life of the NCER-NPSAS grant study. 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 RTI must meet for each employee working on the grant study for 30 days or more. Among these requirements are that each person 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 grant study must have completed the requirements for a "Contractor Security Screening." Depending on the risk level assigned to each person's position, a follow-up background investigation by the Department will occur.

The Family Educational Rights and Privacy Act (FERPA) (34 CFR Part 99) allows the disclosure of personally identifiable information from students' education records 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)(3):

The disclosure is, subject to the requirements of §99.35, to authorized representatives of--

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

NPSAS:16 is collecting data for *CSFA 2017* study under the Secretary's authority. Specifically, NCES, as an authorized representative of the Secretary of Education, is collecting this information for the purpose of evaluating a federally supported education program. Any personally identifiable information is collected with adherence to the security protocol detailed in 34 CFR § 99.35:

- (a)(1) Authorized representatives of the officials or agencies headed by officials listed in §99.31(a)(3) may have access to education records in connection with an audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs.
- (2) The State or local educational authority or agency headed by an official listed in §99.31(a)(3) is responsible for using reasonable methods to ensure

to the greatest extent practicable that any entity or individual designated as its authorized representative—

- (i) Uses personally identifiable information only to carry out an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements related to these programs;
 - (ii) Protects the personally identifiable information from further disclosures or other uses, except as authorized in paragraph (b)(1) of this section; and
 - (iii) Destroys the personally identifiable information in accordance with the requirements of paragraphs (b) and (c) of this section.
- (b) Information that is collected under paragraph (a) of this section must—
- (1) Be protected in a manner that does not permit personal identification of individuals by anyone other than the State or local educational authority or agency headed by an official listed in §99.31(a)(3) and their authorized representatives, except that the State or local educational authority or agency headed by an official listed in §99.31(a)(3) may make further disclosures of personally identifiable information from education records on behalf of the educational agency or institution in accordance with the requirements of §99.33(b); and
 - (2) Be destroyed when no longer needed for the purposes listed in paragraph (a) of this section.
- (c) Paragraph (b) of this section does not apply if:
- (1) The parent or eligible student has given written consent for the disclosure under §99.30; or
 - (2) The collection of personally identifiable information is specifically authorized by Federal law.

Additionally, the grant study, including the administrative data linkages, 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 restricted-use data, prepared as part of the subcontract 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. 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 will provide invaluable information to grant recipients, other researchers, and education policy makers about the federal financial aid that students could receive or have received, as well as critical information concerning their persistence in postsecondary education. Rather than ask students for information about their financial aid, it will be obtained 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 primary communication with students will be reminders to apply for federal financial aid and links to resources at the Department of Education and other sources where they can find guidance on how to apply for aid. Students will then be asked follow-up questions about their knowledge and experiences applying for aid. No sensitive questions will be asked, nor should any sensitive information be exchanged with participants.

12. Estimates of Response Burden

Table 2. Maximum estimated burden to respondents for the *Connecting Students with Financial Aid (CSFA) 2017* study interventions

	Expected number of participants	Expected number of contacts	Total number of responses	Total burden time per participant (mins)	Total burden hours
Not submit 2017-18 FAFSA					
Control	3,000	1	3,000	10	500
Neutral framing	3,000	5	15,000	30	1500
Positive framing	3,000	5	15,000	30	1500
Negative framing	3,000	5	15,000	30	1500
Subtotal	12,000		48,000		5,000
Already submitted 2017-18 FAFSA					
Control	1,000	1	1,000	10	167
Information plus encouragement	1,100	3	3,300	20	367
Subtotal	2,100		4,300		534
Total	14,100		52,300		5,534

Note: *Total burden hours* are a product of *Expected number of participants* and *Total burden time per participant* divided by 60 minutes.

Table 2 provides the projected estimates for response burden for the interventions and the subsequent survey. Response burden for participants will depend on the group assignment. Participants in control groups will only need to complete the survey, which is expected to require about 10 minutes to complete. Students in each of the treatment groups who have not submitted the 2017-18 FAFSA will receive up to 4 intervention mailings, which are expected to each require about 5 minutes to read, plus the 10-minute survey, for a total of 30 minutes per participant. Students in the

treatment group who have already submitted the FAFSA will receive two intervention mailings expected to require about 5 minutes to read, plus the 10-minute survey, for a total of 20 minutes per participant. Estimating an average hourly rate of \$18 for participating students,¹ the 5,534 total burden hours represent approximately \$99,612 in total response burden time cost to students.

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 CSFA 2017 study are shown in table 3. Included in the cost estimates are staff time, reproduction, postage, and telephone costs associated with management and reporting for which clearance is requested.

Table 3. Total costs for the *Connecting Students with Financial Aid (CSFA) 2017* study

	Grant recipient	RTI subcontract	Total
Management	\$155,265	\$45,612	\$200,877
Travel	25,390	0	25,390
Sampling	51,755	10,101	61,856
Instrument development	182,440	23,950	206,390
Data collection			
Administrative records matching	0	14,240	14,240
Student survey data collection	0	412,249	412,249
Data processing	51,755	7,949	59,704
Weighting, imputation, and NR bias analysis	103,510	30,000	133,510
Data analysis and reporting	582,306	22,860	605,166
Other	600,359	0	600,359
Total	\$1,752,780	\$566,961	\$2,319,741

15. Reasons for Changes in Response Burden and Costs

This is a new collection and, as such, represents an increase in respondent burden.

16. Publication Plans and Time Schedule

The starting date for the grant was July 1, 2016 and it will continue through June 30, 2021. An operational schedule is shown in table 4. During the grant period, only the grantee will publish the results based on the collected data (from treatment/control groups and surveys), and this is expected to include peer-reviewed journal articles and policy briefs. After the grant period ends and after the grantee has published the main research paper (whichever comes later), other restricted-use data users may apply to NCES to access the data for their own research.

¹ 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>.)

Table 4. Schedule for the *Connecting Students with Financial Aid (CSFA) 2017* study

Activity	Start date	End date
Pre-intervention preparation		
Develop group randomization	July 1, 2016	December 30, 2016
Coordinate activities with RTI	July 1, 2016	June 29, 2021
Finalize intervention materials	July 1, 2016	December 19, 2016
Focus Groups on intervention material	December 15, 2016	December 15, 2016
Intervention		
Implement interventions	January 23, 2017	May 31, 2017
Pre-survey preparation		
Prepare contact materials (including website)	July 1, 2016	September 29, 2017
Print hardcopy questionnaires	September 1, 2017	September 29, 2017
Program self-administered web survey	June 1, 2017	September 29, 2017
Cognitive interviewing of survey	April 1, 2017	April 30, 2017
Survey data collection		
Administer hardcopy and web surveys	October 2, 2017	December 29, 2017
Key hardcopy survey responses	October 2, 2017	January 31, 2018
Data matching activities		
Match to CPS files	January 12, 2017	
Match to CPS files	February 3, 2017	
Match to CPS files	March 3, 2017	
Match to CPS files	April 3, 2017	
Match to CPS and NSLDS files	September 29, 2017	
Match to CPS and NSLDS files	September 28, 2018	
Match to CPS and NSLDS files	September 30, 2019	
Match to NSC files	December 1, 2018	
Match to NSC files	December 1, 2019	
Analysis		
Clean data	October 1, 2017	April 30, 2020
Analysis of effects	January 1, 2018	August 31, 2020
Present at conferences, gather feedback	September 1, 2020	June 29, 2021
Finalize papers and policy reports, submit for publication	March 1, 2021	June 30, 2021

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.