

Memorandum

United States Department of Education
Institute of Education Sciences
National Center for Education Statistics

DATE: May 14, 2017 (revised June 29, 2017)

TO: Robert Sivinski, OMB

THROUGH: Kashka Kubzdela, OMB Liaison, NCES

FROM: Tracy Hunt-White, NPSAS:16 Project Officer, NCES

SUBJECT: NCER-NPSAS Grant Study - Connecting Students with Financial Aid (CSFA) 2017: Testing the Effectiveness of FAFSA Interventions on College Outcomes Revisions (OMB#-1850- 0931 v.2)

The NCER-NPSAS Grant Study - Connecting Students with Financial Aid (CSFA) 2017 request was approved by OMB in January 2017 (OMB # 1850-0931 v.1). Cognitive interviews on the survey items were conducted in March 2017 (OMB#-1850-0803 v.191) to examine whether college students correctly understand the question wording and whether their answers get adequately captured in multiple-choice questions of the survey instrument to be administered after the end of the intervention. The results of cognitive testing were used to revise the CSFA survey. This request is for approval of these revisions to the survey that will begin in August 2017 and for revisions to the incentive plan and to the communication material that will be sent to sample members to request their participation in the survey. Additionally, we request to modify the CSFA 2017 sample and incentive payment options to comply with the requirements of the Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury; update the confidentiality pledge cited as part of ICILS to account for the Cybersecurity Enhancement Act of 2015; and cite additional data security and confidentiality requirements.

These revisions do not affect the estimated burden to respondents or the total cost to the federal government for CSFA 2017.

Survey Instrument

As initially planned and described in the approved CSFA 2017 Supporting Statement Part A, we are requesting changes to the survey instrument (the revised survey is provided in Appendix C). The main changes result from the outcomes of cognitive interviews, internal review, and consultation with NCES and RTI. Changes can be summarized as 1) reorganization of the survey instrument to minimize respondent burden and improve quality of collected data; 2) reformatting and rewording of some of the survey questions to improve programming logic, question clarity, and data quality; and 3) limiting survey version to an online instrument rather than creating an additional hard-copy version for data collection. There has been no introduction of new content to the survey since the last version of the instrument cleared for cognitive testing.

Intervention Communication Material and Implementation Protocol

The combination of cognitive interviewing outcomes and advising feedback from RTI suggested the development and implementation of a hard-copy survey for data collection would: (a) create unnecessary burden on respondents (navigating survey instructions without automatic skip logic increased the survey completion time significantly); (b) be unlikely to increase survey response rate due to the previous successful contact and interaction with sample members via email and verification of electronic contact viability; and (c) create an unnecessary financial burden on the project, as the hard copy survey option was not included in the contractor's original budget projections.

Additionally, we realized that if we maintain an October 2017 survey launch, the early availability (October 1, 2017) of the 2018-19 FAFSA and the associated marketing and outreach to students may cause confusion in CSFA 2017 sample members. We concluded that launching CSFA in August 2017 may allow students enough time to adjust to the beginning of the term, while administering the CSFA survey about 2017-18 FAFSA before the new (2018-19) FAFSA becomes available.

Lastly, given that the final length of the CSFA 2017 survey is considerably shorter than the NPSAS survey, we concluded that we can offer a lower incentive to the CSFA 2017 participants (\$20) than is typically offered in NPSAS (\$30).

We thus modified the survey communication materials (Appendix B) to update intervention communication materials and implementation protocol described in Supporting Statement Part B:

1. To reduce the approved CSFA 2017 participation incentive from \$30 to \$20.
2. To amend the implementation protocol and supporting communication materials to remove the development and distribution of the hard-copy survey as a response method and to reflect the lower incentive level;
3. To adjust the survey implementation timeline to begin in August 2017; and
4. To amend the survey communication to include the language for the data collection website.

Compliance with OFAC

Prior to the start of data collection, sample members will be matched to a federal database maintained by the U.S. Department of the Treasury's Office of Foreign Assets Controls (OFAC). OFAC administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals. As part of its enforcement efforts, OFAC publishes a list of individuals and companies called the "Specially Designated Nationals List" or "SDN." Their assets are blocked and U.S. entities are prohibited from conducting trade or financial transactions with those on the list

(<https://www.treasury.gov/resource-center/sanctions/Pages/default.aspx>). In order to determine if there are any sample members to whom NCES cannot offer an incentive, the sample members will be matched to the SDN using the Jaro-Winkler and Soundex algorithms recommended by OFAC. To avoid over-matching, project staff will review the cases based on full name, date of birth, and address. The small number of individuals that NCES anticipates to not be able to confirm as not matching the SDN list will not be fielded and will be excluded from the survey.

Update to Confidentiality Pledge and Citation of Security and Confidentiality Requirements

Citation of the data security and confidentiality protection procedures has been expanded in Part A to reflect all of the laws and regulations with which CSFA 2017 data collection contractors and agents must comply. Also, the confidentiality pledge has been updated throughout the submission documents to reflect the addition of the Cybersecurity Enhancement Act of 2015 provision. The revised pledge reads: "All of the information you provide 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 (20 U.S.C. §9573 and 6 U.S.C. §151)."