

2012/17 Beginning Postsecondary Students Longitudinal Study: (BPS:12/17)

Full Scale Interview and Administrative Record
Collections

Supporting Statement Part A
OMB # 1850-0631 v.16

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

August 2016
revised August 2017

Contents

A. Justification

1. Circumstances Necessitating Data Collection.....	3
2. Purpose and Uses of the Data.....	5
3. Use of Information Technology.....	9
4. Efforts to Identify Duplication.....	11
5. Method Used to Minimize Burden on Small Businesses.....	11
6. Frequency of Data Collection.....	11
7. Special Circumstances of Data Collection.....	12
8. Consultants Outside the Agency.....	12
9. Provision of Payments or Gifts to Respondents.....	12
10. Assurance of Confidentiality.....	14
11. Sensitive Questions.....	14
12. Estimate of Respondent Burden.....	17
13. Estimates of Cost to Respondents.....	18
14. Cost to Federal Government.....	19
15. Reasons for Changes in Response Burden and Costs.....	20
16. Publication Plans and Project Schedule.....	20
17. Approval to Not Display Expiration Date for OMB Approval.....	22
18. Exceptions to Certification for Paperwork Reduction Act Submission.....	22

B. Collection of Information Employing Statistical Methods & References

C. References

Appendixes

- A. Technical Review Panel (TRP) List
- B. Confidentiality for Administrative Record Matching
- C. Results from the pilot test experimental items
- D. Student Records Qualitative Evaluation Report
- E. Communication Materials for Survey Respondents
- F. Transcript and Student Records Contacting Materials
- G. BPS:12/17 Survey Items
- H. Student Records Instrument Facsimile

Tables

Table 1. Chronology of NPSAS and its longitudinal components.....	5
Table 2. Maximum estimated BPS:12/17 cost and response burden.....	18
Table 3. Individual and total costs to NCES for BPS:12/17.....	19
Table 4. Total contract costs for BPS:12/17 student interview.....	19
Table 5. Total contract costs for BPS:12 student records and transcripts.....	20
Table 6. Operational schedule for BPS:12/17.....	21

A. Justification

1. Circumstances Making Collection of Information Necessary

a. Purpose of this Submission

The National Center for Education Statistics (NCES), within the U.S. Department of Education (ED), Institute of Education Sciences, is requesting clearance for data collection materials and procedures for the full-scale collection of the 2012/17 Beginning Postsecondary Students Longitudinal Study (BPS:12/17), including the student interview and file matching to various administrative data sources. In addition, NCES is requesting clearance for the collection of postsecondary education transcripts and student records.

BPS is designed to follow a cohort of students who enroll in postsecondary education for the first time during the same academic year, irrespective of the date of high school completion. The study collects data on students' persistence in and completion of postsecondary education programs; their transition to employment; demographic characteristics; and changes over time in their goals, marital status, income, and debt, among other indicators. Data from BPS are used to help researchers and policymakers better understand how financial aid influences persistence and completion, what percentages of students complete various degree programs, what are the early employment and wage outcomes for certificate and degree attainers, and why students leave school.

The enclosed materials proposed for the student interview are based upon the materials tested and refined through cognitive testing, a pilot test, and consultation with a technical review panel (TRP). Two rounds of cognitive testing were conducted. The first round (OMB # 1850-0803 v.134), which focused on a subset of draft questions, was conducted from May 2015 through July 2015 and was administered as a paper questionnaire. The second round of cognitive testing (OMB # 1850-0803 v.143) focused on questionnaire content and understanding and usability of the self-administered instrument (web and mobile-friendly versions) and was conducted from September 2015 through December 2015. Findings from both rounds were incorporated into the pilot test survey instrument (OMB # 1850-0803 v.150), which was fielded in March and April 2016. The TRP was convened in August 2015 to plan for the pilot test, and again in June 2016 in preparation for the full scale data collection.

The BPS:12 student records collection was informed by qualitative evaluation interviews conducted from April to June 2016 (OMB #1850-0803 v.152). Usability and functionality of the data collection instrument used to collect multiple years of student records for individual students was evaluated through one-on-one interview sessions with postsecondary institution staff. Results from this testing (included in appendix D) were used to refine the instrument. BPS:12/17 student records collection is scheduled to begin in February 2017 and will be conducted concurrently with the High School Longitudinal Study of 2009 (HSLs:09) student records collection. As part of NCES' initiative to align the data elements requested from institutions across studies and reduce institutions' response burden, the BPS:12 and HSLs:09 student records collections will use the same instrument. The records collection facsimile included in this submission as appendix H has already been approved for HSLs:09 (OMB #1850-0852 v.17).

BPS:12 postsecondary education transcripts collection (BPS:12 PETS) will be informed by successful procedures developed and refined for postsecondary transcript collections for the Education Longitudinal Study of 2002 (ELS:2002) and the 2009 Postsecondary Education Transcript Study (PETS:09). As with these prior studies, the BPS:12 PETS will include collection of transcripts from all known institutions attended by BPS sample members. Institutions will be identified by student responses in the interview, and from student records and transcripts. Student records and transcripts may contain data (e.g. transfer credits on transcripts) on institutions not identified in interviews due to non-response or missing data. As an official institution record, the postsecondary transcript offers a reliable, highly-detailed source of data regarding academic enrollment, attainment, performance, and course-taking. The BPS:12 PETS, which is designed similarly to those conducted for ELS:2002, BPS:04, and HSLs:09, will collect postsecondary transcripts in 2017. BPS:12 PETS will also include a pilot test to analyze and improve questions about remedial course-taking.

BPS data collection is being carried out for NCES under contract to the U.S. Department of Education (Contract # ED-IES-09-C-0039) by RTI International (a trade name of the Research Triangle Institute), as well as HR Directions, Coffey Consulting, Research Support Services, Strategic Communication, and Kforce Government Solutions.

This submission includes:

- A membership list of the Technical Review Panel (TRP) (appendix A);
- A description of the confidentiality procedures in place for the administrative record matching (appendix B);
- Results from experiments in the BPS:12/17 pilot test (appendix C);
- Results from the student records qualitative evaluation interviews (appendix D);
- Contacting materials for sample members in the survey (appendix E) and institution staff providing student records and transcripts (appendix F); and
- Facsimiles of the student interview (appendix G) and the student records abstraction form (appendix H).

Additionally, Part B section 4.a addresses the BPS terms of clearance:

- From OMB# 1850-0631 v.8: “OMB approves this collection under the following terms: At the conclusion of each of the two monetary incentive calibration activities, NCES will meet with OMB to discuss the results and to determine the incentive amounts for the remaining portion of the study population. Further, NCES will provide an analytical report back to OMB of the success, challenges, lessons learned and promise of its approach to addressing non-response and bias via the approach proposed here. The incentive levels approved in this collection do not provide precedent for NCES or any other Federal agency. They are approved in this specific case only, primarily to permit the proposed methodological experiments.”
- From OMB# 1850-0631 v.9: “Terms of the previous clearance remain in effect. NCES will provide an analytical report back to OMB of the success, challenges, lessons learned and promise of its approach to addressing non-response and bias via the approach proposed here. The incentive levels approved in this collection do not provide precedent for NCES or any other Federal agency. They are approved in this specific case only, primarily to permit the proposed methodological experiments.”

b. Legislative Authorization

BPS is conducted by NCES in close consultation with other U.S. Department of Education offices, federal agencies, and organizations (see sections A.4 and A.8 of this document). BPS 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 subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42—
 - (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.”

2. Purpose and Uses of the Data

a. The BPS Cohort

BPS is one of several studies conducted by NCES to respond to the need for a national, comprehensive database concerning significant issues in access, choice, enrollment, persistence, progress, and attainment in undergraduate postsecondary education, in graduate and professional school access, and in post-enrollment experiences. The base study for BPS is the National Postsecondary Student Aid Study (NPSAS), a recurring survey of a nationally representative, cross-sectional sample of postsecondary students. The NPSAS surveys have been implemented every 3 to 4 years since 1986–87.

There are three previous cohorts of the Beginning Postsecondary Students (BPS) Longitudinal Study: BPS:90, BPS:96, and BPS:04. The BPS:12 cohort was identified from NPSAS:12 just as the previous BPS cohorts, and the B&B study cohorts, have originated from prior NPSAS studies. Unlike BPS, which follows a cohort of first-time beginning students at institutions at all levels of postsecondary education, B&B follows a cohort of baccalaureate recipients at institutions awarding 4-year degrees and above. As the B&B cohort is necessarily made up of degree recipients, persistence in undergraduate education is not an emphasis in B&B, as it is in BPS. Additionally, B&B places a special emphasis on the experiences of new elementary and secondary teachers.

The chronology of the previous administrations of the NPSAS study and its associated BPS and B&B longitudinal components are presented in table 1. With the first BPS cohort starting in 1990 (BPS:90), the BPS:12 cohort is the fourth study of beginning postsecondary students. Beginning with the BPS:96 cohort, FTB students are surveyed at three points in time for up to 6 years: in the base year (through the NPSAS student interview) and 3 and 6 years later in the BPS follow-up interviews. The BPS:90 cohort was also surveyed at three points in time, but the second follow-up was 5 years later.

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 update
NPSAS:2000	B&B:2000/01	—	—
NPSAS:04	BPS:04/06	BPS:04/09	Administrative data update
NPSAS:08	B&B:08/09	B&B:08/12	B&B:08/18
NPSAS:12	BPS:12/14	BPS:12/17	Administrative data update
NPSAS:16	B&B:16/17	B&B:16/21	—

— Not applicable

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

BPS follows a cohort of students who entered postsecondary education for the first time in the same academic year. BPS differs from other studies in two key ways: the population it follows and the sources of data from which it draws. First, it is the only nationally representative study of *all* beginning college students. Unlike other studies, it includes students entering postsecondary education immediately after high school as well as those entering after being away from school for years. In addition, unlike other studies that focus only on baccalaureate students, BPS includes not just students seeking bachelor’s degrees but also students pursuing certificates, working toward associate’s degrees, and taking postsecondary classes outside of a degree or certificate program. BPS is also unique in that it includes a student interview and does not rely

solely on institution-reported data. The inclusion of a student interview allows BPS to provide a more accurate portrait of students' persistence and attainment anywhere within postsecondary education and not just their retention and attainment at a specific institution.

This most recent cohort of BPS includes students who first entered postsecondary education in 2011–12. Data on their first academic year were collected in 2012, and then data on their second and third year were collected in the BPS:12/14 first follow-up study conducted in 2014. The BPS:12/17 second follow-up study will provide data on these sample members' fourth, fifth, and sixth year after entering postsecondary education. Student financial aid records will be collected from all known postsecondary institutions in 2017, and transcripts from all known institutions will be collected in 2018.

BPS is an essential source of data on FTB students' demographics, high school preparation, enrollment and employment while enrolled, financial aid and borrowing, and education and career expectations. The primary purpose of BPS is to improve our understanding of how these factors relate to three key outcomes: postsecondary persistence, degree attainment, and employment.

The BPS:12 cohort has several new features that will enhance our understanding of FTB students' experiences. First, the BPS:12 cohort utilizes a research framework, the human capital model, which addresses the costs and benefits associated with enrolling and persisting in higher education (Becker 1975). With the human capital framework, researchers will be able to investigate questions such as students' expectations of earning after completing anticipated credentials and the extent to which students' preferences for current rewards over future rewards shape education and employment outcomes. Second, given increased interest in the relationship between subbaccalaureate credentials and employment, this BPS cohort includes an oversample of students seeking educational certificates in 2-year public, 2-year for-profit, and 4-year for-profit institutions. Third, the interview includes an expanded employment section that will enrich analyses of students' labor market experiences and outcomes.

In addition to sample member interviews, transcripts and financial aid student records will be collected from the postsecondary institutions attended by BPS:12 sample members. The two data sources will address a range of issues concerning students' enrollment and coursetaking patterns, progress and attainment in postsecondary education, and the types, sources, and amounts of student aid received across years of attendance.

BPS:12 PETS. The BPS transcript collection is the second in a series of postsecondary education transcript studies of beginning postsecondary students; the first study took place in 2009 (as part of PETS:09). Postsecondary transcripts provide a wealth of data on enrollment, including degree or certificate program, terms enrolled, course intensity when enrolled, and fields of study. Furthermore, transcripts provide coursetaking details including subjects taken and credits and grades earned. These data provide important links among academic performance, plans and expectations, and pathways into the workforce of the sample members. As an official institution record, the transcript is a more reliable source of data regarding academic performance than self-reported information. The transcript collection for BPS:12, designed similarly to PETS:09 and HSL:09, will provide information on the course of study of students as they begin, leave, and re-enter postsecondary study and transfer between institutions. The combination of transcripts and other study data collected through interviews and file matching will afford researchers the opportunity to analyze paths taken by cohort members as they progressed through postsecondary education.

BPS:12 Student Records. Despite access to federal aid databases, a complete picture of all non-federal inputs into student financial aid has been lacking in the postsecondary longitudinal studies. Availability of financial aid is important at all points in the postsecondary process (persistence, transfer, and ultimate educational attainment). The financial aid data records collected from the institutions attended by sample members will increase the analytic power of BPS:12. Using financial aid information provided by the institution, analysts will be able to better calculate measures such as cumulative aid and debt, and the availability of scholarship, fellowship, grant, and loan amounts. The financial aid records collection will also yield detailed information about students' enrollment patterns, degree or program of study, progress toward degree, and costs of attendance.

b. Current Research and Policy Issues Related to BPS

Growing competitiveness abroad and structural changes to the U.S. economy have increased interest in improving postsecondary education attainment and labor market preparedness. While in 1990 the United States led the world in 4-year degree attainment, it now ranks 12th. President Obama has called for every American to pursue at least one year of education beyond high school—including postsecondary occupational education. Prominent foundations such as the Lumina Foundation and the Bill and Melinda Gates Foundations have also set goals for increasing Americans' attainment of postsecondary credentials valued in the labor market. Designed to improve our understanding of the factors related to postsecondary persistence, degree attainment, and employment, BPS:12/17 will address several key research and policy issues relevant to policymakers' search for ways to improve Americans' educational attainment and readiness for today's job market.

First, as demographics change in the U.S., policymakers and practitioners are increasingly concerned about the difference between who enters postsecondary education and who attains postsecondary credentials. Federal TRIO programs and the Obama administration's My Brother's Keeper initiative are examples of programs tackling this issue. BPS:12/17 will be able to provide the latest nationally representative numbers on how key populations are entering and faring in postsecondary education, particularly students from low socioeconomic and minority backgrounds. These data will allow researchers and policymakers to explore the factors related to populations experiencing greater success on the outcome measures of interest.

Second, policymakers and researchers are more focused on how the education and employment outcomes of students are shaped by the control and level of the institution they attend. The recently launched College Scorecard is designed to publicize key metrics about student outcomes so families can make more informed college choice decisions. Additionally, Gainful Employment regulations seek to ensure that students are able to find employment in a recognized occupation with earnings that can cover their student loan repayments. BPS:12/17 has the sample size and the key measures to enable researchers and policymakers to analyze students' attainment and employment by sector, while also controlling for other variables that may be related to these outcomes.

Third, the cost of college, the percentage of students borrowing, and the amounts borrowed have increased. As a result, the impact of college costs, financial aid, and student loans on students' ability to complete credentials is an ever more pressing issue. In recent years, Pell Grant eligibility has been expanded, and the amount of the grant increased. There have also been calls at the national, state, and local level to make community college tuition free for 2 years, with Tennessee featuring prominently with the new Tennessee Promise scholarship. BPS:12/17 can help inform these policy decisions by providing data on how grants, and other financial aid, impact students' road to a credential.

Finally, researchers and policymakers are interested in how attainment and employment are affected by several aspects of the postsecondary experience, such as remedial education, online education, and employment while in school. Students' lack of college readiness and need for remedial or developmental education have been identified as impediments in students' time to degree, as well as factors in students dropping out without a credential. In fact, the Department of Education launched a new Center for the Analysis of Postsecondary Readiness (CAPR) to strengthen the research, evaluation, and support of college readiness efforts across the nation. BPS:12/17 includes information on high school coursetaking, grades, and test scores as well as developmental coursetaking in different subjects while in college, which can provide key data for the Center's work. The growth of online courses and degree programs has also attracted attention, with researchers and practitioners wanting to better understand its potential in speeding students' time to degree and the ways such courses and programs are perceived by employers. The degree to which working while enrolled helps or hurts postsecondary attainment, time to degree, and later employment outcomes is a key debate. Through its employment history, BPS:12/17 will be able to add real data to this discussion.

Following are some of the many research and policy issues to be addressed with BPS:12/17 data:

Postsecondary Enrollment Characteristics and Experiences

- How are FTB students distributed across institutions of varying control and levels, and different degree programs?
- What fields of study do FTB students pursue, and in which fields do they obtain degrees?
- How frequently do FTB students change their field of study, particularly from science, technology, engineering, and mathematics (STEM) to non-STEM fields and vice versa?
- On average, how many credits do students earn before completing a certificate or degree program?
- To what extent do FTB students participate in online, night, and weekend courses and programs?
- How do answers to the above questions differ by factors like demographic characteristics, control and level of institution, and field of study?

Employment During Enrollment

- What percentage of students work while enrolled, and how many hours do they work?
- How do students' individual patterns in working while enrolled change by year of enrollment and U.S. economic conditions?
- How do answers to the above questions differ by factors like demographic characteristics, control and level of institution, and field of study?

Financial Aid and Borrowing

- How much financial support do dependent FTB students receive from their parents or other relatives and friends for their postsecondary education?
- What proportion of FTB students receive federal Pell Grants or veterans or other Department of Defense education benefits?
- What proportion of FTB students take out private loans, and in what amount?
- How does the percentage of FTB students taking out federal loans and the average amount borrowed vary by demographic and enrollment characteristics?
- How does the amount of grants and loans FTB students receive from federal, institutional, and private sources differ during each year of enrollment?
- How much do FTB students borrow in private loans?
- What kinds of borrowers struggle in repayment and default on their student loans after 6 years?
- How do answers to the above questions differ by factors like demographic characteristics, control and level of institution, and other enrollment characteristics?

Education and Career Expectations

- What degrees or certificates do FTB students expect to attain, when do they expect to complete them, and how confident are they in these expectations?

- What is the relationship between these attainment expectations and actual attainment outcomes 6 years after students begin college?
- How much social and emotional support do FTB students receive from their families and friends in their pursuit of their educational goals?
- To what careers do FTB students aspire, and what do they think they will earn in these positions?
- How close are students' predicted earnings to actual average earnings in their expected careers?
- How do answers to the above questions differ by demographic characteristics?

Persistence

- At what rate do students stop out of postsecondary education, how often do they do it, and when do they do it?
- At what rate do students transfer between institutions, when do they transfer, and what are the most common transfer patterns in terms of the types of institutions left and entered?
- What proportion of certificate attainers enter another certificate or degree program? Are their subsequent certificates and degrees in related fields of study?
- What proportion of FTB students are enrolled in their first institution 6 years after initially enrolling but have yet to earn a credential?
- What proportion of FTB students are enrolled in any institution 6 years after first enrolling but have yet to earn a credential?
- Among students who leave postsecondary education without a credential, in what year did they leave?
- How do answers to the above questions differ by demographic characteristics, high school preparation, control and level of institution, attendance intensity, employment during enrollment, financial aid and borrowing, physical and mental health, sense of belonging at institution, discount rate, and education and career expectations?

Attainment

- What percentage of FTB students earn a certificate, associate's degree, or bachelor's degree?
- How long does it take FTB students to earn each of these credentials?
- How do answers to the above questions differ by institution level and control, attendance intensity, transfer patterns, stopouts, changes in major and major choice? What role do demographic characteristics, high school preparation, employment during enrollment, financial aid and borrowing, physical and mental health, sense of belonging at institution, discount rate, and education and career expectations play?

Employment Outcomes After Leaving Postsecondary Education

- How much do FTB students earn after 6 years, and what benefits do they receive?
- What percentage of FTB students are employed in their field of study? How do their employment outcomes compare to those who are not employed in their field of study?
- Among FTB students who did not enter postsecondary education directly from high school, to what extent does their employment before and after postsecondary education differ? To what extent does employment prior to postsecondary education influence employment outcomes after postsecondary education?
- How do FTB students' employment outcomes after leaving postsecondary education compare to their employment during their postsecondary education?
- What percentage of FTB students have experienced unemployment spells? How many spells have they had, and how many months has each spell lasted?

- How do answers to the above questions differ by degree and certificate attainment; field of study; and level, control, and selectivity of institution attended? What role do demographic characteristics, employment prior to and during postsecondary enrollment, debt, and earlier education and career expectations play?

Answers to these and other related questions will enable policymakers at the local, state, and national levels to craft informed policies that meet America's changing student demographics, postsecondary landscape, and labor force needs.

c. Previous Agency Use of the Data

NCES has used data from the previous cycles of BPS in a variety of publications. NCES also makes BPS data available for use by researchers, policymakers, and others via both restricted-use data files and the public-use data tools, PowerStats and QuickStats.

3. Use of Information Technology

a. BPS:12/17 interview

To improve the efficiency of the student data collection, BPS:12/17 will use web-based student interviewing across two modes of data collection: self-administered surveys and computer-assisted telephone interviewing (CATI). In NPSAS:12 and the BPS:12/14 full-scale study, 82 percent and 79 percent of interviews, respectively, were completed online as self-administered surveys. For BPS:12/17, the interview will be adapted to be mobile friendly as more respondents are using mobile devices to complete the interview. In BPS:12/14 full-scale, approximately 22 percent of responses were completed on a mobile device.

a. BPS:12 PETS

Information technology will be employed in the collection of postsecondary transcripts and course catalogs from the institutions attended by sample members. Wherever possible, improved information technology will be used to ensure the most accurate, high quality, and least burdensome institution data collections, including when requesting course catalogs. Institution staff will receive a letter announcing the start of data collection and will be invited to access the Postsecondary Data Portal (PDP) website. The website will include information about the purposes of the institution data collections, including both student records and transcripts. The website will include forms and instructions, frequently asked questions, legal authority, confidentiality, and contact information for project staff.

To access restricted pages containing confidential information, the user will be required to log in by entering an assigned ID number and password. We will allow primary coordinators at the institution the ability to create additional users through the PDP. Using a 'Manage Users' link available only to the primary coordinator, the primary coordinator will be able to add and delete users, as well as reset passwords and assign roles. Each user will have a unique username and will be assigned to one email address. Upon account creation, the new user will be sent a temporary password by the PDP. Upon logging in for the first time, the new user will be required to create a new password.

Postsecondary transcripts will be requested from all institutions known to have been attended by the sample member. Directed to the PDP, institution staff will find instructions for all available options, and resources, for providing transcripts, including uploading, electronic fax, and other secure means (Part B section B.3 includes a description of each method). In addition to transcripts, RTI will collect course catalogs where cohort members were enrolled. College Source Online will be a primary source of catalogs. When not available via this source, data collection staff will review school websites. When catalogs cannot be obtained from College Source Online or school websites, institutions will be asked to provide the course catalogs directly to RTI via the means of their choice, such as email, postal mail, or other methods.

A keying and coding system (KCS) will be used for data entry of the transcripts received. The KCS application, developed by RTI, includes data entry fields corresponding to the key data elements to be collected from transcripts. Following quality control and data cleaning processes, data collected from transcripts will be assembled into data files for subsequent analysis.

a. *BPS:12 Student Records*

The PDP will be the primary avenue for institution staff to provide student records. As with the transcript request, the institutions will receive a letter announcing the start of data collection and will be invited to access the PDP website for information about the study and instructions for providing data, including forms and instructions, frequently asked questions, legal authority, confidentiality, and contact information for project staff. An online video tutorial will be available to instruct users on how to navigate through the application and help screens will provide in-depth explanations of the requested items. Text of the PDP is included in appendix F.

To ensure the efficiency, quality, and ease of providing student financial aid records, BPS will use a web-based application within the PDP similar to the application used in ELS:2002 and NPSAS:12, and currently in use in NPSAS:16. Institutions will be offered multiple options for providing student data, including: (1) uploading electronic (.csv) files to a secure web site; (2) downloading an Excel workbook from the web site, then uploading the completed file to the site; and (3) use of a web-based data entry interface. The web-based application will allow institution staff to perform error checks and to make corrective revisions before submission. Different institution staff can complete portions of the required data entry and can complete the data entry in multiple sessions. These features reduce user burden while ensuring that the most accurate data are collected.

4. Efforts to Identify Duplication

Efforts to identify duplication have included NCES consultations with other ED offices and federal agencies, such as ED's Office of Postsecondary Education; ED's Office of Planning, Evaluation and Policy Development; the National Science Foundation; the Congressional Budget Office; and the Office of Management and Budget. NCES also routinely consults with non-federal associations such as the American Council on Education, the Association of Private Sector Colleges and Universities, the National Association of Independent Colleges and Universities, and the Institute for Higher Education Policy to confirm that the data to be collected for the BPS longitudinal study are not available from any other sources. Academic researchers are also consulted, with several attending Technical Review Panel (TRP) meetings along with representatives from federal agencies, associations, and postsecondary institutions (see appendix A for the list of TRP participants). Beyond identification of duplication, these consultations provide methodological insights from the results of other longitudinal postsecondary student studies conducted by NCES and other federal agencies and nonfederal sources, and the consultations assure that the data collected through BPS will meet the needs of the federal government and other relevant organizations.

No other studies in the U.S duplicate the data produced by BPS, however there have been a number of related studies to BPS. For example, NCES has conducted high school cohort studies which follow students into college, such as High School and Beyond (HS&B), the National Longitudinal Study of the High School Class of 1972 (NLS-72), the National Education Longitudinal Study of 1988 (NELS:88), the Education Longitudinal Study of 2002 (ELS:2002), and the High School Longitudinal Study of 2009 (HSLs:09). While these studies accurately reflect the education and employment experiences and outcomes of the high school cohorts from which they drew a sample, they are not nationally representative of all beginning postsecondary students because not all beginners enter directly from high school. In fact, according to BPS:12/14, one-quarter of all beginning postsecondary students were over age 19 when they entered for the first time.

Another related study conducted by NCES is the *Integrated Postsecondary Education Data System (IPEDS) Graduation Rate Survey (GRS)*. Like BPS, the GRS provides data on enrollment and attainment for both recent and nonrecent high school graduates. However, the GRS definition of a beginning postsecondary student is more restrictive than that of BPS as it is limited to full-time, degree seeking, first-time postsecondary students who entered in the fall. In addition, GRS collects enrollment and attainment data from institutions rather than students, meaning it can only provide information on students' attainment at the first institution attended and not students' attainment at any institutions to which they transfer.

5. Method Used to Minimize Burden on Small Businesses

The student interview does not involve small businesses or entities. For BPS:12 PETS and Student Records, some small institutions will be contacted. Burden on these institutions will be minimized by working closely with an institution-appointed coordinator (e.g., the registrar) before the start of the data collection to identify the format in which records are kept and transmitted. To further minimize burden, course catalogs will be collected from public sources when available. To accommodate any constraints imposed by record-keeping systems, institutions will be offered alternative methods of providing the requested transcripts and student financial aid records as described above in section A.3.

6. Frequency of Data Collection

BPS studies have been conducted periodically since 1990, as described in section A.2. The first follow-up BPS:12/14 full-scale data collection was conducted in 2014, 2 years after the base year NPSAS:12 full-scale collection from which the BPS student sample was selected. BPS:12/17 is the second follow-up. In addition to the interview in 2017, student records will be collected in 2017 and transcripts in 2018.

NPSAS and its longitudinal spin-off studies, BPS and B&B, are conducted to reflect the large-scale and rapid changes in federal policy concerning postsecondary student aid. Eligibility restrictions change, sizes of grant and loan amounts fluctuate, and the balance between various aid options can change dramatically. A recurring study is essential, first, to help predict future costs for financial aid because loan programs create continued obligations for the federal government as long as the loans are being repaid. Second, repeated surveys can capture the changing nature of the postsecondary environment. With the longitudinal design of the NPSAS survey and BPS follow-ups, representative national samples of first time beginning students with similar base-year characteristics may be compared over time to determine the effects of changes in federal policy and programs. Third, repeated surveys can help researchers understand the effect of economic conditions on the employment outcomes for subbaccalaureate educational certificate holders. The new oversample of certificate seekers that will be available for the full-scale study, combined with the longitudinal nature of BPS, allows for analysis of how the value of these credentials shifts in response to market forces.

7. Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

8. Consultants outside the Agency

Recognizing the significance of the BPS:12/17 data collection, several strategies have been incorporated into the project work plan to ensure efforts are not duplicative with other studies, and to allow for the critical review and acquisition of comments relating to project activities, interim and final products, and projected and actual outcomes.

Consultations with other federal offices include ED's Office of Postsecondary Education; ED's Office of Planning, Evaluation and Policy Development; and other federal 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 TRPs. 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.

NCES also consults with academic researchers, several of whom attend the BPS TRP meetings. 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 BPS will meet the needs of the federal government and relevant organizations. The membership of the TRP (see appendix A) represents a broad spectrum of the postsecondary community. The nonfederal members serve as expert reviewers on the technical aspects of the study design, data collection procedures, and instrument design, especially item content and format. In August 2015, the TRP reviewed the pilot interview content and study design. In June 2016, a second meeting was convened to review findings from the pilot, and focus on recommendations for the full-scale collection.

9. Provision of Payments or Gifts to Respondents

The use of incentives is an integral part of the overall data collection plan for BPS, and is proposed for the purpose of encouraging early response and minimizing nonresponse. The following section summarizes the plans for payments for the interview and institutions.

a. Sample members

The BPS:12/17 student interview will involve a responsive design conducted in two separate stages. Using the same approach as in BPS:12/14, the goals of a responsive design have been tailored to meet the needs of the second follow-up. A detailed plan is provided in Part B section B.4. In addition, changes required by the Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury during the calibration sample are added to the end of the section.

The first stage, a calibration study, will evaluate the efficacy of pre-paid incentive amounts among those who have responded to previous BPS interviews, and will evaluate, for those who have not responded to prior interviews, the efficacy of a larger incentive versus the offer of an abbreviated interview. For those study members who have responded to prior student interviews, the calibration sample will evaluate the use of pre-paid incentive amounts. Half will receive a \$10 pre-paid PayPal¹ offer and will receive an additional \$20 upon completion of the survey (\$30 total). The other half will receive an offer for \$30 upon completion of the survey with no pre-paid offer. At six weeks, the two approaches will be compared, and in consultation with OMB, the results will be used to determine if the pre-paid offer should be extended to the main sample. For all monetary incentives, including prepayments, sample members have the option of receiving disbursements through PayPal or in the form of a check.

For those cases who have not responded to previous interviews, the calibration sample will evaluate the efficacy of a larger incentive versus the offer of an abbreviated interview with a smaller incentive. Half will be offered an abbreviated interview along with \$10 pre-paid incentive through PayPal and an additional \$20 upon completion of the survey (\$30 total). The other half will be offered the full interview along with a \$10 pre-paid PayPal offer and an additional \$65 upon completion of the survey (\$75 total). All double nonrespondents (those study members who did not respond in either the base year or first follow-up) are being offered the \$10 pre-paid PayPal offer in an attempt to convert them to respondents. At six weeks, the two approaches will be compared and the approach with a higher response rate will be selected for those cases in the main sample with no prior responses. If both perform equally, we will use the \$30 total baseline incentive along with the abbreviated interview.

The second stage of the responsive design plan will employ the selection and targeting of cases for additional treatment conducted in pre-determined phases (agreed upon with OMB based on the results of the calibration): an additional monetary incentive and later an abbreviated interview.

In the first phase, cases with a history of interview response in NPSAS:12 or BPS:12/14 will be subjected to selection and targeting for additional treatment using their importance score (see Part B section B.4). Targeted cases will be offered a \$45 incentive boost, based on findings from BPS:12/14 calibration sample, on top of their original baseline incentive of \$30. In the second phase, important cases will again be selected, and targeted with the offer of an abbreviated interview.

Additionally, during the second stage of the responsive design, for those who have not responded to a

¹ A prepaid check will be mailed to sample members who request it. Sample members can also open a PayPal account when notified of the incentive. Any prepaid sample member who neither accepts the prepaid PayPal incentive nor check would receive the full incentive amount upon completion by the disbursement of their choice (i.e. check or PayPal).

previous interview, the data collection period will be shorter than for the rest of the main sample, and will offer, in pre-determined incremental phases, an additional monetary incentive and an abbreviated interview, and will transition to a passive data collection. For those who have a history of not responding, at 14 weeks into data collection, all remaining nonrespondents will be offered the maximum intervention consisting of an abbreviated interview and \$65 upon completion of the interview to make \$75 the total offer when the \$10 pre-paid is taken into account.

We have also designed an evaluation of the responsive design so that we can test the impact of the targeted interventions on reducing nonresponse bias as compared to not targeting for interventions. For the evaluation, we will select random subset of all sample members to be pulled aside as a *control* sample that will not be eligible for intervention targeting. The remaining sample member cases will be referred to as the *treatment* sample and the targeting methods will be applied to that group. A detailed plan is provided in Part B section B.4.

During the calibration phase in March 2017, PayPal compliance notified RTI that three sample members designated to be given a pre-paid incentive were flagged as persons possibly sanctioned by the the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC). To comply with OFAC sanctions and to ensure the BPS:12/17 PayPal account remained in good standing, RTI began implementing methods to identify sample members who may match to those listed on OFAC's Specially Designated Nationals and Blocked Persons (SDN) list. Programmatic matching, using methods recommended in OFAC's Web-based Sanction List Search tool, was performed on the entire BPS:12/17 fielded sample (n=33,750). This matching process resulted in 345 potential matches between the BPS:12/17 sample and the SDN list. These 345 cases were manually reviewed against additional sources of information. Of these cases, 315 individuals were ruled out as matches to individuals on the OFAC SDN list. The remaining 30 cases could not be ruled out as sanctioned individuals. To comply with OFAC requirements and to avoid compliance issues with PayPal, the 315 individuals will be offered an incentive by check only, while the remaining 30 cases will not be fielded in BPS:12/17 and will be excluded from the survey.

b. *Institutions*

Institutions will be reimbursed for the cost of preparing and sending student record data and transcripts at the institution's standard rate. If additional costs are incurred by the institution, RTI will reimburse such expenses to the extent that they are reasonable and properly documented. Based on similar postsecondary student record collections conducted for ELS:2002 and NPSAS:12, it is expected that approximately 60 institutions will request and receive reimbursement at an average cost of \$950 per institution. At the time of writing this submission, the NPSAS:16 collection has yet to reimburse any institutions for records.

10. Assurance of Confidentiality

NCES assures participating individuals and institutions that all identifiable information collected in the BPS studies 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].

Data security and confidentiality protection procedures have been put in place for BPS:12/17 to ensure that RTI and its subcontractors comply with all privacy requirements, including:

1. The statement of work of this contract;
2. *Family Educational and Privacy Act (FERPA) of 1974* (20 U.S.C. §1232(g));
3. *Privacy Act of 1974* (5 U.S.C. §552a);
4. *Privacy Act Regulations* (34 CFR Part 5b);
5. *Computer Security Act of 1987*;
6. *U.S.A. Patriot Act of 2001* (P.L. 107-56);
7. *Education Sciences Reform Act of 2002* (ESRA 2002, 20 U.S.C. §9573);

8. *Confidential Information Protect and Statistical Efficiency Act of 2002*;
9. *E-Government Act of 2002*, Title V, Subtitle A;
10. *Cybersecurity Enhancement Act of 2015* (6 U.S.C. §151);
11. The U.S. Department of Education General Handbook for Information Technology Security General Support Systems and Major Applications Inventory Procedures (March 2005);
12. The U.S. Department of Education Incident Handling Procedures (February 2009);
13. The U.S. Department of Education, ACS Directive OM: 5-101, Contractor Employee Personnel Security Screenings;
14. NCES Statistical Standards; and
15. All new legislation that impacts the data collected through the contract for this study.

Furthermore, 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), Federal Information Processing Standards (FIPS) publications, Office of Management and Budget (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 Department has established a policy regarding the personnel security screening requirements for all contractor employees and their subcontractors. The contractor must comply with these personnel security screening requirements throughout the life of the contract. The Department directive that contractors must comply with is OM:5-101, which was last updated on 7/16/2010. There are several requirements that the contractor must meet for each employee working on the contract for 30 days or more. Among these requirements are that each person working on the contract must be assigned a position risk level. The risk levels are high, moderate, and low based upon the level of harm that a person in the position can cause to the Department’s interests. Each person working on the contract must complete the requirements for a “Contractor Security Screening.” Depending on the risk level assigned to each person’s position, a follow-up background investigation by the Department will occur.

The BPS 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. BPS:12/17 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.

To further ensure that confidentiality is appropriately maintained at all times, vendors who assist in locating and tracing sample members are also required to follow procedures that appropriately safeguard personally identifying information. RTI’s vendor contracts outline requirements for information security policies and assessments, security awareness training, physical and environmental security, monitoring, and access control. They also specify the means by which information may be transmitted between RTI and the contractor. Appendix B documents the data security language contained in vendor contracts.

BPS, and other NCES postsecondary studies, include data linkages with many existing sources of valuable data, including Department of Education’s (ED) Central Processing System (CPS) for Free Application for Federal Student Aid (FAFSA) data, the National Student Loan Data System (NSLDS), and National Student Clearinghouse (NSC). These NCES studies also obtain data from institution student records and admissions test scores from ACT and The College Board. Security measures are in place to protect data during file matching procedures described in section A.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.

To protect against the possible disclosure of confidential data, we plan to include a number of protections. First, in the student survey, the login page will include a warning that unauthorized access is prohibited and violates U.S. Code sections 1029 and 1030 and other applicable statutes, and is punishable by civil and criminal penalties. In addition, the survey will include a confirmation of identity using unique information known about sample members, such as the last four digits of their SSN, a birthdate, or a previous mailing address. We will also include barriers within the survey instrument to prevent inadvertent disclosure of confidential information by backing through a completed survey.

Second, in the Postsecondary Data Portal, users will be required to log in by entering an assigned ID number and password. We will allow primary coordinators at the institution the ability to create additional users through the PDP. Using a 'Manage Users' link available only to the primary coordinator, the primary coordinator will be able to add and delete users, as well as reset passwords and assign roles. Each user will have a unique username and will be assigned to one email address. Upon account creation, the new user will be sent a temporary password by the PDP. Upon logging in for the first time, the new user will be required to create a new password.

The Family Educational Rights and Privacy Act

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 BPS:12/17 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."

BPS is collecting data 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, BPS, 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 Social Security Numbers (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 BPS:12/17 will provide invaluable data to researchers and education policy makers about the federal financial aid that students have received related to their persistence in and graduation from postsecondary education. Rather than relying on students for information about financial aid, NCES is obtaining it from the NSLDS, which is ED's system of recording federally aided student loans taken out and grants received. Students tend to be an unreliable source of information about the amounts and timing of grants and loans received. Administrative record data are accurate and much easier to obtain than collecting the same data by administering a questionnaire.

11. Sensitive Questions

The BPS:12/17 interview ask about income, earnings, debts, academic performance, and marital and family status. Federal regulations governing the administration of these questions, which might be viewed as sensitive due to personal or private information, require (1) clear documentation of the need for such information as it relates to the primary purpose of the study, (2) provisions to respondents that clearly inform them of the voluntary nature of participation in the study, and (3) assurances that responses may be used only for statistical purposes, except as required by law (20 U.S.C. § 9573).

The collection of data related to income, earnings, indebtedness, academic performance, and employment is essential to the key policy issues motivating this study. Financial resources and obligations can play an important role in student persistence in and attainment of postsecondary credentials, as can academic performance. In addition, income and earnings are critical outcome measures in analyzing students'

employment and in assessing the rate of return students receive for their investment in postsecondary education.

The collection of information about marital and family status also facilitates the exploration of key policy issues. Social and financial support provided by spouses can play an important role in students enrolling and persisting in postsecondary education and in employment decisions. Financial and time demands of dependents can also influence education choices, like length of degree program to pursue, major, whether to persist and attain a credential, as well as employment choices, like hours worked and benefits needed.

12. Estimate of Respondent Burden

Based on experiences from prior rounds of BPS and NPSAS, table 2 provides the projected maximum estimates for response burden and respondent burden time costs for the BPS:12/17 students interview, student records, and student transcript collections.

We estimate the completion of the student interview to require, on average, approximately 30 minutes for cases who have responded to previous interviews, and 40 minutes for cases who have neither responded to NPSAS:12 nor BPS:12/14 interviews. Estimating an hourly rate of \$20.03², the 14,447 total hours for the interview translates to a burden time cost of approximately \$289,374.

For the postsecondary transcript and student records collection, the total number of postsecondary institutions attended by sample members will differ. The student record collection sample is estimated to be 4,130, which is based on the number of institutions identified from the student interview and administrative record matching. The sample for PETS full-scale and the registration page (n=4,543) includes the institutions from the student record sample plus additional institutions identified on collected transcripts. For the PETS pilot collection, the sample (n=574) is the known number of institutions attended by the BPS:12/17 pilot study sample members collected in early 2016.

We estimate an average burden of 5 minutes for completing the registration page, which is the mechanism through which a chief administrator names a primary coordinator for the institution collection in the PDP. Since institutions may have different coordinators provide transcripts and students records (i.e. registrar for transcripts, financial aid director or institutional researcher for student records), this table assumes the maximum number of respondents. We estimate the PETS pilot to require approximately 10 minutes per institution, the PETS full-scale approximately 1 hour per institution, and the student records collection approximately 11.5 hours (or 695 minutes) per institution. Using an hourly rate of \$40.47³ for the institutional staff, the estimated 40,543 total hours for the institutional data collections translates to a response burden time cost of approximately \$1,640,776.

Table 2. Maximum estimated BPS:12/17 cost and response burden

Data collection activity	Sample	Expected eligible	Expected response rate (percent)	Expected number of respondents*	Expected number of responses	Average time burden per response (mins)	Total time burden (hours)	Rate per hour (\$)	Total cost (\$)
Student interview									
Previous respondents ¹	30,456	30,456	91%	27,715	27,715	30	13,858		
Previous nonrespondents ²	3,272	2,945	30%	884	884	40	589		
Total	33,728	33,401	86%	28,599	28,599		14,447	20.03	289,374

² The hourly rate (\$20.03) was obtained by averaging the usual weekly earnings of the upper limit of the first quartile of full-time wage and salary workers for a combination of adults 25 years and over with a bachelor's degree or higher and the upper limit of the median weekly earnings of workers with some college or associate's degree in the second quarter of 2016. Source: BLS Usual Weekly Earnings of Wage and Salary Workers (Table 5, <http://www.bls.gov/news.release/pdf/wkyeng.pdf>); Occupation codes: All employees (00-0000); accessed August 22, 2016.

³ The hourly rate (\$40.47) was obtained using the hourly mean wage of operations research analysts in the May 2015 National Occupational and Employment Wage Estimates sponsored by the Bureau of Labor Statistics (BLS). Source: BLS Occupation Employment Statistics, <http://data.bls.gov/oes/> data type: Occupation codes: Operations Research Analysts (15-2031); accessed on August 22, 2016.

Institution collection							
Registration page	4,543	4,089	87%	3,558	3,558	5	297
PETS Pilot	574	574	87%	500	500	10	84
PETS Full-scale	4,543	4,089	87%	3,558	3,558	60	3,558
Student Records	4,130	3,717	85%	3,160	3,160	695	36,604
Total				10,776	10,776		40,543
Total in this request				39,375	39,375		54,990
						40.47	1,640,776
							1,930,150

* Respondent totals do not include duplicative counts of individuals.

¹NPSAS:12 study members who have responded to either NPSAS:12 or BPS:12/14, or to both.

²NPSAS:12 study members who have responded to neither NPSAS:12 nor BPS:12/14.

13. Estimates of Cost to Respondents

Respondents will incur no costs associated with participation in this study beyond the response burden time cost.

14. Cost to Federal Government

A summary of estimated costs to the federal government for BPS:12/17 are shown in table 3.

Table 3. Individual and total costs to NCES for BPS:12/17 and administrative collections

Costs to NCES	Amount (\$)
BPS:12/17 Pilot Test	
Salaries and expenses	111,290
Contract costs	1,903,689
Total	2,014,979
BPS:12/17 Full-Scale Study	
Salaries and expenses	150,000
Contract costs	6,647,857
Total	6,797,857
BPS:12 Student Records collection	
Salaries and expenses	75,000
Contract costs	2,577,555
Total	2,577,555
BPS:12 PETS collection	
Salaries and expenses	75,000
Contract costs	5,247,823
Total	5,247,823
Total costs	
Salaries and expenses	261,290
Contract costs	16,376,924
Total	\$16,638,214

NOTE: BPS = Beginning Postsecondary Students Longitudinal Study.

Cost estimates include staff time, reproduction, postage, and telephone costs associated with the management, data collection, analysis, and reporting for which clearance is requested. Table 4 provides a more detailed breakdown of contract costs of the BPS:12/17 student interview. Table 5 provides contract costs for the student record and transcript collections.

Table 4. Total contract costs for BPS:12/17 student interview

Study area and task	Budgeted amount
110 Post Award Conference	\$36,653
120 Schedules	47,861
130 Monthly Reports	435,255
140 Integrated Monitoring System	509,827
Field test data collection	
210 Sampling	76,476
220 RIMS/OMB Forms Clearance	80,891

231	Instrumentation	761,808
232	Tracing	90,456
234	Training for Data Collection	178,939
236	Data Collection	423,832
237	Data Processing	411,407
240	Methodology Reports	214,357
299	Incentives	42,952
Full-scale data collection		
310	Sampling	40,231
320	RIMS/OMB Forms Clearance	34,101
331	Instrumentation	934,701
332	Tracing	444,899
334	Training for Data Collection	330,550
336	Data Collection	2,842,920
337	Data Processing	1,044,950
338	Weighting, Imputation & Nonresponse Bias Analysis	502,259
339	Data Disclosure	64,262
340	Methodology Reports	368,198
399	Incentives	40,786
Reporting		
410	First Look	162,398
420	PowerStats	157,850
430	Additional Special Tabulations	291,803
440	Web Tables	116,700
450	Respond to Information Requests	269,211
460	Final Technical Memo	15,480

NOTE: BPS = Beginning Postsecondary Students Longitudinal Study.

Table 5. Total contract costs for BPS:12 student records and PETS

Study area and task	Budgeted amount
Student Records Field Test	
231 Instrumentation	\$114,659
233 Training Institution Data Collection Staff	82,610
235 Data Collection	390,642
237 Data Processing	41,301
Student Records Full Scale	
331 Instrumentation	88,040
333 Training Institution Data Collection Staff	190,977
335 Data Collection	822,897
337 Data Processing	392,542
338 Weighting, Imputation & Nonresponse Bias Analysis	254,303
339 Data Disclosure	48,636
Student Records Reporting	
420 PowerStats	150,948
Transcript Field Test	
610 Systems	317,108
620 Data Collection	217,940
630 Keying and coding	303,019
640 Data Files	154,097
Transcript Full Scale	
650 Systems	290,010
660 Data Collection	1,374,082

670	Keying and coding	1,609,301
680	Data Files	794,097
690	Weighting, Imputation & Nonresponse Bias Analysis	188,169

NOTE: BPS = Beginning Postsecondary Students Longitudinal Study.

15. Reasons for Changes in Response Burden and Costs

The apparent increase in respondent burden is due to the fact that the previous clearance was for the BPS:12/14 full scale student interview, while this submission includes the BPS:12/17 full scale student interview, the student record collection, and the transcript collection.

16. Publication Plans and Project Schedule

The contract for BPS requires multiple reports, publications, and other public information releases:

- First Look reports (descriptive summaries of significant findings for dissemination to a broad audience);
- Complete data files and documentation for research data users in the form of both a restricted-use file and public-use data tools (i.e., QuickStats, PowerStats);
- Detailed data file documentation describing all aspects of the full-scale study design and data collection procedures; and
- Special tabulations of issues of interest to the higher education community, as determined by NCES.

Additional reports, including Statistics in Brief and Statistical Analysis Reports, may also be published from the full-scale data. The operational schedule for the BPS:12/17 full-scale study is shown in Table 6.

Table 6. Operational schedule for BPS:12/17

Activity	Start date	End date
Pilot Test		
Sample specifications	6/16/2015	8/11/2015
Data collection		
Self-administered web interviews	3/7/2016	4/18/2016
Process data, construct data files	2/29/2016	6/17/2016
Prepare data file documentation	3/8/2016	8/18/2017
Full-scale		
Update/deliver sample specifications	4/26/2016	6/28/2016
Conduct panel maintenance activities	10/1/2016	01/15/2017
Conduct locating and tracing activities (cleared under 1850-0631 v.8)	11/1/2016	10/17/2017
Conduct help desk and CATI training	12/19/2016	3/16/2017
Data collection		
Self-administered web interviews	3/1/2017	10/17/2017
Telephone interviews	3/21/2017	10/17/2017
Process data, construct data files	1/3/2017	7/19/2018
Prepare and publish reports	9/18/2017	6/27/2019
Student Records		
Contact institutions regarding student record abstractions	2/6/2017	12/22/2017
Conduct Student Records financial aid data collection	2/13/2017	12/22/2017
Process data, construct data files	2/14/2017	9/27/2019
Prepare reports (Student Records and PETS combined)	9/17/2018	9/27/2019
Transcripts – pilot test		

Conduct transcript collection	2/13/2017	12/29/2017
Key and code transcripts	3/20/2017	12/29/2017
Produce report	12/30/2017	3/30/2018
Transcripts – full-scale		
Conduct transcript collection	11/1/2017	9/28/2018
Key and code transcripts	2/5/2018	11/30/2018
Produce data files	5/21/2018	5/3/2019
Prepare reports (Student Records and PETS combined)	9/17/2018	9/27/2019

NOTE: BPS = Beginning Postsecondary Students; CATI = computer-assisted telephone interviewing.

17. Approval to Not Display Expiration Date for OMB Approval

No special exception is requested. The expiration date for OMB approval of the information collection *will be displayed* on data collection instruments and materials.

18. Exceptions to Certification for Paperwork Reduction Act Submission

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