

Public Comment Received During the 30-day Comment Period and NCES Response

December 2016

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

ED-2016-ICCD-0093-0012

Comments on FR Doc # 2016-25732

Submitter Information

Name: Andrew Reamer

Address: Washington, DC

Document: 2016-ICCD-0093-0016

General Comment

THE GEORGE WASHINGTON INSTITUTE OF PUBLIC POLICY

805 21ST STREET, NW MEDIA AND PUBLIC AFFAIRS BUILDING, SIXTH FLOOR WASHINGTON, DC 20052
202-994-0970 FAX 202-994-8913 WEB www.gwu.edu/~gwipp

November 23, 2016

Director, Information Collection Clearance Division

U.S. Department of Education

400 Maryland Avenue SW, LBJ, Room 2E-349

Washington, DC 20202-4537

RE: 2012/17 Beginning Postsecondary Students Longitudinal Study (OMB Control # 1850-0631)

Via: www.regulations.gov

Dear Director,

I am pleased to provide comments on the National Center for Education Statistics (NCES) information collection request (ICR) to the Office of Management and Budget (OMB) for the 2012/17 Beginning Postsecondary Students Longitudinal Study (BPS: 12/17). An invitation to comment on this ICR was published in the Federal Register on October 25, 2016 (FR Doc. 2016- 25732).

As a research professor, I focus on federal policies that promote U.S. economic competitiveness. Secretary of Labor Thomas Perez recently appointed me to the Workforce Information Advisory Council (WIAC) as the representative of research organizations.

Congress created the WIAC to advise the Secretary on the development and maintenance of a nationwide workforce and labor market information (LMI) system in cooperation with NCES and other federal statistical agencies (see 29 USC 491-2). In particular, this law:

- indicates that the workforce and LMI system shall “meet the needs of secondary school and postsecondary school students who seek [workforce and labor market information]”
- directs the Secretary of Labor to “actively seek the cooperation of heads of other Federal agencies to establish and maintain mechanisms for ensuring complementarity and nonduplication in the development and operation of statistical and administrative data collection activities”

Consistent with this latter point, NCES staff were invited to and present at the WIAC’s inaugural meeting in July 2016.

I believe that the BPS provides data essential to the development of the mandated workforce and LMI system and, more generally, a globally competitive American workforce. Consequently, I support the NCES’s forthcoming request to carry out the BPS: 12/17.

In my comments on the BPS: 12/17 submitted on September 29, 2016 in response to the 60- day notice, I requested that NCES explore the extent to which the BPS data collection could institution and student respondents. NSC records cover 97 percent of enrollments in Title IV degree-granting institutions. As can be seen in the attachment to this letter, NSC record data elements appear to cover a portion of the information planned for collection through BPS: 12/17. (For a full discussion of the sources, structure, and uses of NSC data, see Afet Dunbar and Doug Shapiro, "The National Student Clearinghouse as an Integral Part of the National Postsecondary Data Infrastructure," National Student Clearinghouse Research Center, May 2016.)

The BPS: 12/17 Supporting Statement Part A, Section 12, indicates that the survey's total cost is \$16.6 million; the estimated burden on 10,776 postsecondary institution respondents is 36,604 hours; and the estimated burden for 28,623 student respondents is 14,459 hours. To the extent that NCES can use NSC records as an information source for the BPS, it might be able to correspondingly reduce respondent burden, and perhaps total costs.

NCES examination of opportunities to use NSC data would be consistent with the efforts of the 114th Congress to promote federal use of administrative data instead of and in combination with survey data, as expressed in its approval of FY2016 funding the Census Bureau to create a national federal data clearinghouse and its establishment of the Commission on Evidence-based Policymaking (PL 114-140).

In response to my suggestion, David Richards, BPS: 12/17 Project Officer, wrote the following points (dated October 20, 2016) as an attachment to the ICR (bold italics added to key points):

- "BPS and other NCES postsecondary sample studies ***already use NSC data in a number of ways***. For example, NSC data are used in pre-sample matching to check for study eligibility. In addition, BPS uses matched data from NSC (and other administrative records) as an additional source to complete gaps in student information."
- "However, ***the NSC data cannot replace the institution collection due to NSC's lack of coverage of institutions and of information for certain sectors***, especially the for-profit sector. BPS includes students attending institutions at all institution levels (i.e., less-than 2-year, 2-year, and 4-year) and controls (i.e., public, private nonprofit, and for-profit). Lower coverage in the for-profit sector necessitates contacting institutions and students in these institutions."
- "***BPS collects student data that are not found in NSC data***. For example, NSC has limited demographic variables and no information on education experiences of students while they are enrolled and when they leave postsecondary education. This necessitates the continued collection of these data through student interviews."
- "As NSC and other administrative data sources continue to improve their coverage and data, ***NCES will continue to evaluate these sources for future studies and future uses***."

After seeing Mr. Richards' response, I communicated with Doug Shapiro, director of the NSC Research Center, and learned the following:

- According to the latest information, the NSC coverage rate for private non-profit institutions is 96% of all students enrolled; for private for-profit institutions, the figure is 74%.
- NSC records contain between 80 and 100 of the BPS data elements, including as term by- term enrollment status, majors and degrees, and permanent and local addresses.
- If institutions participating in the NSC were given the option to submit their NSC-held data in bulk for the BPS, significant reductions in cost and burden might be realized.
- In addition, if data were submitted uniformly from NSC on behalf of these institutions, there might be significantly fewer BPS reporting errors.

In early November, Mr. Shapiro wrote to Mr. Richards requesting an opportunity to explore ways in which the NSC might be useful to NCES.

In light of the information I received from Mr. Shapiro about the potential value of use of the NSC for the BPS, and his

offer to explore that potential with NCES staff, I request that OMB, as a condition of clearance, encourage NCES to accept Mr. Shapiro's offer and report back to OMB on the results of the conversation, including an initial assessment of the potential uses of NSC in future BPS information collections.

I appreciate the opportunity to comment on NCES's proposal to conduct the BPS: 12/17 and hope that my thoughts are found to be of value.

Sincerely,
 Andrew Reamer
 Research Professor

Source: National Student Clearinghouse Research Center, "The National Student Clearinghouse as an Integral Part of the National Postsecondary Data Infrastructure," May 2016

APPENDIX A: NATIONAL STUDENT CLEARINGHOUSE (NSC) DATA ELEMENTS

Reporting

School Code
 Branch Code
 Academic Term
 Standard Report Flag
 Certification Date
 Reporting Level
 Student Social Security Number (SSN)
 First Name
 Middle Initial
 Last Name
 Name Suffix
 Previous SSN
 Previous Last Name
 Enrollment Status
 Status Start Date
 Street Line 1
 Street Line 2
 City
 State
 Zip
 Country
 Anticipated Graduation Date
 Date of Birth
 Term Begin Date
 Term End Date
 Directory Block Indicator

Optional Data Elements Added in 2008

NCES Classification of Institutional Programs (CIP) Code for Major 1
 NCES CIP Code for Major 2
 Major Course of Study 1
 Major Course of Study 2
 Class/Credential Level
 First Time, Full Time Flag
 Degree Seeking Flag
 High School Code
 Gender
 Race/Ethnicity
 College Student ID
 State Student ID
 Email
 Good Student Flag
 Middle Name

150% Program Rules Added in Fall 2014

Program Indicator
 Program 1 CIP Code
 CIP Year
 Program 1 Credential Level
 Published Program 1 Length
 Published Program 1 Length Measurement

Weeks Program 1 Title IV
 Academic
 Year
 Program 1 Begin Date
 Special Program Indicator
 Program 1 Enrollment Status
 Program 1 Enrollment Status Effective Date
 Program 2 CIP Code
 CIP Year
 Program 2 Credential Level
 Published Program 2 Length
 Published Program 2 Length Measurement
 Weeks Program 2 Title IV
 Academic
 Year
 Program 2 Begin Date
 Special Program Indicator
 Program 2 Enrollment Status
 Program 2 Enrollment Status Effective Date
 Program 3 CIP Code
 CIP Year
 Program 3 Credential Level
 Published Program 3 Length
 Published Program 3 Length Measurement
 Weeks Program 3 Title IV
 Academic
 Year
 Program 3 Begin Date
 Special Program Indicator
 Program 3 Enrollment Status
 Program 3 Enrollment Status Effective Date
 Program 4 CIP Code
 CIP Year
 Program 4 Credential Level
 Published Program 4 Length
 Published Program 4 Length Measurement
 Weeks Program 4 Title IV
 Academic
 Year
 Program 4 Begin Date
 Special Program Indicator
 Program 4 Enrollment Status
 Program 4 Enrollment Status Effective Date
 Program 5 CIP Code
 CIP Year
 Program 5 Credential Level
 Published Program 5 Length
 Published Program 5 Length Measurement
 Weeks Program 5 Title IV
 Academic
 Year
 Program 5 Begin Date

Special Program Indicator
 Program 5 Enrollment Status
 Program 5 Enrollment Status Effective Date
 Program 6 CIP Code
 CIP Year
 Program 6 Credential Level
 Published Program 6 Length
 Published Program 6 Length Measurement
 Weeks Program 6 Title IV
 Academic
 Year
 Program 6 Begin Date
 Special Program Indicator
 Program 6 Enrollment Status
 Program 6 Enrollment Status Effective Date

Optional Data Elements Added in Fall 2014

Veteran's Status Indicator
 CommIT ID
 Pell Grant Recipient Flag
 Remedial Flag
 Citizenship Flag
 Student Phone Type
 Preferred Phone Number Flag
 Student Phone Country Code
 Student Phone Number
 Move To Office of Postsecondary Education Identification (OPEID)

DegreeVerifySM Data Elements

School Code
 Branch Code
 Official School Name
 Standard Report Flag
 Transmission Date
 Degree Period
 Student SSN
 First Name
 Middle Name
 Last Name
 Name Suffix
 Previous Last Name
 Previous First Name
 Date of Birth
 College Student ID
 Degree Level Indicator
 Degree, Certificate, or Credential Title
 School/College/Division
 Awarding Degree
 Joint Institution/College/School/

Division Name
 Date Degree, Credential, or Certificate Awarded
 Major Course of Study 1
 Major Course of Study 2
 Major Course of Study 3
 Major Course of Study 4
 Minor Course of Study 1
 Minor Course of Study 2
 Minor Course of Study 3
 Minor Course of Study 4
 Major Option 1
 Major Option 2
 Major Concentration 1
 Major Concentration 2
 Major Concentration 3
 NCES CIP Code for Major 1
 NCES CIP Code for Major 2
 NCES CIP Code for Major 3
 NCES CIP Code for Major 4
 NCES CIP Code for Minor 1
 NCES CIP Code for Minor 2
 NCES CIP Code for Minor 3
 NCES CIP Code for Minor 4
 Academic Honors
 Honors Program
 Other Honors
 Attendance From Date
 Attendance To Date
 FERPA Block
 School Financial Block
 Name of Institution Granting Degree

StudentTracker for High Schools Data Elements

Account Code
 Account Name
 File Transmission Date
 Diploma Period
 Student SSN
 First Name
 Middle Name
 Last Name
 Name Suffix
 Previous Last Name
 Previous First Name
 Date of Birth
 Student ID
 Diploma Type
 High School Graduation Date
 Family Educational Rights and Privacy Act (FERPA) Block
 High School Name
 ACT Code
 Gender
 Ethnicity
 Economically Disadvantaged Indicator

8th Grade State Assessment
Result,
Math
8th Grade State Assessment
Result,
English Language
Arts/Reading
High School State
Assessment
Result, Math
High School State
Assessment
Result, ELA/Reading
English Learner or English as
a
Second Language Indicator
Number of Semesters of
Math
Completed
Dual Enrollment Indicator
Disability Code
Program Code

**Reverse Transfer Data
Elements**

OPEID
OPEID Branch Code
File Certified Date
Client File ID
Student ID
Student SSN
Student Individual Taxpayer
Identification Number (ITIN)
First Name
Middle Name
Last Name
Name Suffix
Date of Birth
Street Line 1
Street Line 2
City
State
ZIP
Country
Student Phone number
Student Email
Course Name
Course Number
Course Description
Course-Semester Session
Course Begin Date
Course End Date
Grade
Number of Credits
Credit Description
Degree-granting Institutions
OPEID

NCES RESPONSE:

Dr. Reamer,

Thank you for your additional feedback on the BPS:12/17 collection and the benefits of National Student Clearinghouse (NSC) data. NSC provides valuable postsecondary enrollment data that supplement the research the National Center for Education Statistics (NCES) conducts. In fact, the Department is currently in negotiations with NSC on establishing a long-term contract (see: https://www.fbo.gov/index?s=opportunity&mode=form&id=d442b618e1e9d16a684c618a530329d9&tab=core&_cview=0). NCES has been using NSC data since 2005 for a number of postsecondary studies, such as the Beginning Postsecondary Students Longitudinal Study (BPS:04/09 and BPS:12/14), the National Postsecondary Student Aid Study (NPSAS:08, NPSAS:12, NPSAS:16 [not yet released]), and the Baccalaureate and Beyond Longitudinal Study (B&B:08/12 and B&B:16/17 [not yet released]). As a result, NCES and its data collection contractor have extensive experience with NSC data. While NSC data elements are used as one source of information in BPS, NCES has several reasons for collecting information directly from institutions and students rather than relying solely on the NSC collection. These reasons include the differential coverage of NSC across all sectors and levels of postsecondary institutions, the varying level of missing data among NSC data elements, and limitations with the data on a key measure used for sampling.

First, the match rates for the NCES studies do not reach the rates published on NSC's website due to differing target populations. While NSC reports coverage rates as high as 97 percent, the match rate for BPS:12/14 is lower, at 75 percent (Hill et. al., 2016). This difference is primarily due to the type of institutions that provide information to NSC, which are primarily degree-granting institutions. In BPS:12/14, the institution universe includes non-degree granting institutions and has 7,050 Title IV institutions, whereas NSC includes a smaller number of Title IV institutions (5,670). Additionally, match rates vary extensively by sector, and private for-profit enrollment is insufficiently captured. For example, among responding students who attended a private for-profit 2-year institution between 2011–12 and 2013–14, NSC's coverage of the BPS sample in this sector was 41 percent¹. Further, while private for-profit institutions represent 33 percent of all student attendance in BPS:12/14 (unweighted), 77 percent of BPS nonmatches to NSC are students attending private for-profit institutions.

Second, the NSC data elements have differing levels of missing data across the approximately 80 data elements shared with BPS. While NSC has a high level of reporting for enrollment, coverage of other data elements is not as high (see https://nscresearchcenter.org/wp-content/uploads/Reporting_of_NSC_Additional_Data_Elements.pdf). For example, students' field of study is of particular importance to the study goals of BPS, but the NSC report rate is 77 percent. It is important to note that the institution burden estimates include many data elements that are not collected by NSC, including state- and institutional-level financial aid, detailed student coursetaking from transcripts, and details regarding students' cost of attendance. While certain demographics are available across both sources, coverage is lower in NSC than BPS (e.g., 60 percent for race/ethnicity; 44 percent for remediation). Especially given the lower overall for-profit match rate noted above, this reduced coverage of supplemental data elements is a concern. As a result, NSC data alone cannot meet the minimum requirements under the *NCES Statistical Standards and Tabular Guidelines* (<https://nces.ed.gov/statprog/2012/>, see *Standard 2-2*) or OMB's *Statistical Standards and Guidelines for Statistical Surveys* (https://www.whitehouse.gov/sites/default/files/omb/inforeg/statpolicy/standards_stat_surveys.pdf).

In past administrations of BPS, NCES has found that there is error in crucial data needed for sampling. BPS uses NSC data to assist in efficiently identifying first-time beginning (FTB) students, which constitute the sample for the study. Because institutions have trouble identifying FTB students, administrative data sources are used to supplement

¹ This unweighted rate was derived internally, and includes all institutions attended between 2011-12 and 2013-14 as reported by the student.

student records prior to sampling students. Matching to NSC resulted in a 7 percent false positive rate in identifying FTB students. In other words, data from other data sources indicated that 7 percent of the sample identified as an FTB using NSC alone actually had a previous enrollment (Hill et. al., 2016). By using administrative data from multiple sources to verify first-time beginning status, the sample and the data collected are more representative of first-time beginning students. While information collected directly from students is used to confirm eligibility, using a single source strategy would result in expenditures to collect information that would need to be discarded for ineligible students. In addition, if too many students are excluded as ineligible after data collection, there is a risk that minimum sample sizes to meet study precision requirements would not be met.

While NSC is an important data source for NCES's postsecondary sample surveys, it is best able to augment, rather than replace, institutional student records and the student interview. Requesting information directly from the institutions and students on the elements also found in NSC ensures better coverage across sectors and also increases the likelihood that the data are up-to-date. Having both NSC and directly reported data enables NCES and its contractor to verify data across multiple sources and, in the end, provide more complete and accurate data to produce national statistics and support policy relevant research.

Thank you for contacting NSC about engaging with NCES about the use of their data, as this continues to be a resource of interest to our studies. In fact, several NCES staff attended a Department briefing given by NSC's Director of Research, Afet Dundar, Ph.D., on October 13, 2016. Dr. Dundar spoke extensively about the NSC coverage rates for their enrollment data and some specific data elements, plus provided information on current and new services offered by NSC. As mentioned above, the Department is currently in negotiations with NSC about establishing a long-term contract. Once negotiations are completed, NCES will be open to meeting with NSC to further discuss their coverage rates and services.

Thank you again for your comments and your interest in the BPS data collection. NCES is always looking for ways to increase the use of administrative data to reduce respondent burden.

Sincerely yours,

David Richards
Project Officer
2012/17 Beginning Postsecondary Students Longitudinal Study
National Center for Education Statistics
U.S. Department of Education

Hill, J., Smith, N., Wilson, D., and Wine, J. (2016). *2012/14 Beginning Postsecondary Students Longitudinal Study (BPS:12/14): Data File Documentation* (NCES 2016-062). U.S. Department of Education. Washington, DC: National Center for Education Statistics. Retrieved 11/29/16 from <http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2016062>.