

# **Public Comment Received During the 60-day Comment Period and NCES Response**

**October 2016**

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

ED-2016-ICCD-0093-0001

Comments on FR Doc # 2016-20263

## **Submitter Information**

**Name:** Andrew Reamer

**Address:** Washington, DC

**Document:** ED-2016-ICCD-0093-0010

## **General Comment**

Dear Director,

I am pleased to provide comments on the National Center for Education Statistics (NCES) plan to seek Office of Management and Budget (OMB) approval for the 2012/17 Beginning Postsecondary Students Longitudinal Study (BPS: 12/17). An invitation to comment on this plan was published in the Federal Register on August 24, 2016 (FR Doc. 2016-20263).

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.

I have one request for NCES’s consideration—that it explore the extent to the BPS data collection could rely on National Student Clearinghouse records in lieu of information sought from postsecondary institution and student respondents. Clearinghouse records cover 97 percent of enrollments in Title IV degree-granting institutions. As can be seen in the attachment to this letter, Clearinghouse 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 Clearinghouse 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 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 that for 28,623 student respondents is 14,459 hours. To the extent that NCES can use Clearinghouse records as an information source for the BPS, it might be able to correspondingly reduce respondent burden, and perhaps total costs.

Consequently, I ask that NCES contact the Clearinghouse to explore the potential for utilizing the latter's records. Suggested points of contact are:

- Roberta Hyland, Chief of Staff, National Student Clearinghouse (hyland@studentclearinghouse.org, 703.742.4203)
- Doug Shapiro, Director, National Student Clearinghouse Research Center (shapiro@studentclearinghouse.org, 703.742.4864)

NCES examination of opportunities to use Clearinghouse 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 funding the Census Bureau to create a national federal data clearinghouse and in its establishment of the Commission on Evidence-based Policymaking.

I appreciate the opportunity to comment on NCES's plans to conduct the BPS: 12/17 and hope it finds my thoughts of value.

## **NCES RESPONSE:**

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

Dr. Reamer,

Thank you for your comments on the proposed BPS:12/17 collection. NCES has reviewed your suggestion to explore the use of National Student Clearinghouse (NSC) data for BPS:12/17.

Fortunately, 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. In addition, 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.

Thank you again for your comments and your interest in the BPS data collection.

Sincerely yours,

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