

High School Longitudinal Study of 2009 (HSLs:09) Second Follow-up Main Study

Supporting Statement Part A

OMB# 1850-0852 v.27

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

August 2017
revised November 2017

TABLE OF CONTENTS

Section	Page
A. Justification.....	1
A.1 Circumstances Necessitating Collection of Information.....	1
A.1.a Purpose of This Submission.....	1
A.1.b Legislative Authorization.....	2
A.1.c Prior and Related Studies.....	2
A.2 Purpose and Uses of the Data.....	3
A.2.a HSLs:09 Purposes.....	3
A.2.b HSLs:09 Research and Policy Issues.....	6
A.3 Use of Information Technology.....	10
A.3.a Postsecondary Transcripts: HSLs:09 PETS.....	10
A.3.b Student Financial Aid Records Collection: HSLs:09 FAR.....	10
A.4 Efforts to Identify Duplication.....	11
A.5 Method Used to Minimize Burden on Small Businesses.....	12
A.6 Frequency of Data Collection.....	12
A.7 Special Circumstances of Data Collection.....	13
A.8 Consultations Outside NCES.....	13
A.9 Provision of Payment or Gift to Respondents.....	13
A.10 Assurance of Confidentiality.....	14
A.11 Sensitive Questions.....	18
A.12 Estimates of Response Burden.....	19
A.13 Estimates of Cost Burden to Respondents.....	20
A.14 Costs to the Federal Government.....	20
A.15 Reasons for Changes in Response Burden and Costs.....	20
A.16 Publication Plans and Project Schedule.....	21
A.17 Approval to Not Display Expiration Date for OMB Approval.....	22
A.18 Exceptions to Certification for Paperwork Reduction Act Statement.....	22

EXHIBITS

Number	Page
Exhibit A-1. HSLs:09 data collection components, by wave of data collection.....	2
Exhibit A-2. Longitudinal design for the HSLs:09 ninth-grade cohort: 2009–25.....	12
Exhibit A-3. Estimated burden for HSLs:09 second follow-up.....	19
Exhibit A-4a. Total costs to NCES.....	20
Exhibit A-4b. Total contract costs.....	20
Exhibit A-5. Operational schedule for HSLs:09 second follow-up.....	21

ATTACHMENTS

- Appendix A HSLs:09 Technical Review Panel (TRP) Participants
- Appendix B Confidentiality Procedures for Administrative Record Matching
- Appendix C Data Security Language for Vendor Contracts
- Appendix D Communication Materials for Survey Respondents
- Appendix E Facsimiles for the HSLs:09 Second Follow-up Interview and Abbreviated Interview
- Appendix F Transcript Data Request Contacting Materials and Data Elements
- Appendix G Student Financial Aid Records Request Contacting Materials
- Appendix H Student Financial Aid Records Instrument Facsimile
- Appendix I Cognitive Testing Report

A. JUSTIFICATION

A.1 Circumstances Necessitating Collection of Information

A.1.a Purpose of This Submission

The High School Longitudinal Study of 2009 (HSLs:09) is conducted by the National Center for Education Statistics (NCES), part of the Institute of Education Sciences (IES) within the U.S. Department of Education. The primary contractor for this study is RTI International (a trade name of the Research Triangle Institute). Subcontractors include Coffey Consulting; HERMES; HR Directions; Research Support Services; and Strategic Communications, Inc, with Dr. Sandy Baum as a consultant.

This request is to conduct the HSLs:09 second follow-up main study, including a survey of panel members, collection of transcripts and financial aid records from postsecondary institutions, file matching to various extant data sources, descriptions of proposed data collection plans for the main study, options for responsive design modeling and interventions for data collection, draft facsimiles of the data collection instruments, and panel maintenance for future follow-up activities.

The enclosed materials proposed for the main study are based upon the materials utilized in the field test, which were approved in March 2015 (OMB# 1850-0852 v.15 and 16). The data collection plans and responsive design approaches proposed in this submission were developed based on results from experiments conducted during the field test, for which data collection ended in July 2015. The proposed responsive design approach was based on thorough analysis of the field test results, feedback received from the Technical Review Panel (TRP) in August 2015, and discussions with OMB in September 2015 about main study plans. NCES has incorporated the final plans for the responsive design approach into Part A and B of this submission. The data collection instruments will be finalized based on feedback received from the TRP, and will be provided by early November 2015. In addition to the Supporting Statement Parts A and B, this submission includes appendixes A-H, specified in the list of attachments on the previous page.

The HSLs:09 base-year data collection took place in the 2009–10 school year, with a randomly selected sample of fall-term 9th-graders in more than 900 public and private high schools with both 9th and 11th grades.¹ This fall 2009 cohort of 9th graders has been followed over time, with follow-up interviews in spring 2012 and summer-fall 2013 and a collection of administrative records (such as high school transcripts). The basic components and key design features of HSLs:09 are summarized in exhibit A-1, by wave of data collection.

HSLs:09 data will allow researchers, educators, and policymakers to examine motivation, achievement, and persistence in STEM (as well as non-STEM) coursetaking and careers. More generally, HSLs:09 data will allow researchers from a variety of disciplines to examine issues of college entry, persistence, and success, and how changes in young people's lives and their connections with communities, schools, teachers, families, parents, and friends affect these decisions, including:

- academic (especially in mathematics), social, and interpersonal growth;
- transitions from high school to postsecondary education, and from school to work;
- students' choices about, access to, and persistence in math and science courses, majors, and careers;
- the characteristics of high schools and postsecondary institutions and their impact on student outcomes;
- family formation, including marriage and family development, and how prior experiences in and out of school correlate with these decisions; and

¹ Types of schools that were excluded from the sample based on the HSLs:09 eligibility definitions are described as part of the discussion of the target population in the *HSLs:09 Base-Year Data File Documentation* (see chapter 3, section 3.2.1), Ingels et al. (2011). See the same source for further information about the study sample design, including state-representative samples and base-year student oversampling.

- the contexts of education, including how minority and at-risk status is associated with education and labor market outcomes.

Exhibit A-1. HSLs:09 data collection components, by wave of data collection

	Base Year	1st Follow-up	2013 Update	2nd Follow-up
Sample Member Survey	◇	◇	◇	◇
Sample Member Math Assessment	◇	◇		
Parent Survey	◇	◇		
School Counselor Survey	◇	◇		
School Administrator Survey	◇	◇		
Math Teacher Survey	◇			
Science Teacher Survey	◇			
High School Transcripts			◇	
Postsecondary Transcripts				◇
Postsecondary Student Financial Aid Records Data				◇
Administrative Data (e.g., SAT, ACT, GED, CPS, NSLDS, NSC ² , ETS, voting data)			◇	◇

A.1.b Legislative Authorization

HSLs:09 is authorized under the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543).

A.1.c Prior and Related Studies

In 1970, NCES initiated a program of longitudinal high school studies, the Secondary Longitudinal Studies series. Its purpose was to gather time-series panel data on nationally representative samples of high school students that would be pertinent to the formulation and evaluation of education policies. Starting in 1972, with the National Longitudinal Study of the High School Class of 1972 (NLS:72), NCES began providing education policymakers and researchers with longitudinal data that linked education experiences with later outcomes, such as early labor market experiences and postsecondary education enrollment and attainment. The NLS:72 cohort of high school seniors was surveyed five times (in 1972, 1973, 1974, 1979, and 1986). A wide variety of interview data were collected in the follow-up surveys, including data on students’ family background, schools attended, labor force participation, family formation, and job satisfaction. In addition, postsecondary transcripts were collected.

Almost 10 years later, in 1980, the second in the series of NCES longitudinal surveys was launched, this time starting with two high school cohorts. High School and Beyond (HS&B) included one cohort of high school seniors comparable to the seniors in NLS:72. The second cohort within HS&B extended the age span and analytical range of NCES’s longitudinal studies by surveying a sample of high school sophomores. With the sophomore cohort, information became available to study the relationship between early high school experiences and students’ subsequent education experiences in high school. For the first time, national data were available showing students’ academic growth over time and how family, community, school, and classroom factors promoted or inhibited student learning. In a leap forward for education studies, researchers, using data from the extensive battery of cognitive tests within HS&B, were also able to assess the growth of cognitive abilities over time. Moreover, data were now available to analyze the school experiences of students who later dropped out of high school. These data became a rich resource for policymakers and researchers over the next decade and provided an empirical base to inform the debates of the education reform movement that began in the early 1980s. Both cohorts of HS&B participants were

² National Student Clearinghouse

resurveyed in 1982, 1984, and 1986. The sophomore cohort was also resurveyed in 1992. Postsecondary transcripts were collected for both cohorts.

The third longitudinal study of students conducted by NCES was the National Education Longitudinal Study of 1988 (NELS:88). NELS:88 further extended the age and grade span of NCES longitudinal studies by beginning the data collection with a cohort of 8th-graders. Along with the student survey, it included surveys of parents, teachers, and school administrators. It was designed not only to follow a single cohort of students over time (as had NCES's earlier longitudinal studies, NLS:72 and HS&B), but also, by "freshening" the sample at each of the first two follow-ups, to follow three nationally representative grade cohorts over time (8th-, 10th-, and 12th-grade cohorts). This provided not only comparability of NELS:88 to existing cohorts, but it also enabled researchers to conduct both cross-sectional inter-cohort and longitudinal intra-cohort analyses of the data. In 1993, high school transcripts were collected. Students were interviewed again in 1994 and 2000, and in 2000-01 their postsecondary education transcripts were collected.

The Education Longitudinal Study of 2002 (ELS:2002) was the fourth longitudinal high school cohort study conducted by NCES. ELS:2002 started with a sophomore cohort and was designed to provide trend data about the critical transitions experienced by students as they proceeded through high school and into postsecondary education or their careers. Student interviews and assessments in reading and mathematics were collected along with surveys of parents, teachers, and school administrators. In addition, a facilities component and school library/media studies component were added for this study series. Freshening occurred at the first follow-up in 2004 to allow for a nationally representative cohort of high school seniors, which was followed by the collection of high school transcripts. A second follow-up was conducted in 2006, a third follow-up in 2012, with a postsecondary education transcript component in 2013.

These studies have investigated the education, personal, and vocational development of students, and the school, familial, community, personal, and cultural factors that affect this development. Each of these studies has provided rich information about the critical transition from high school to postsecondary education and the workforce. HSLs:09 will continue on the path of its predecessors while also focusing on the factors associated with choosing, persisting in, and succeeding in STEM course-taking and careers.

A.2 Purpose and Uses of the Data

This section provides information on the purposes of HSLs:09 and an overview of the primary research issues it addresses.

A.2.a HSLs:09 Purposes

HSLs:09 has important affinities to its predecessor longitudinal studies by addressing many of the same issues of transition from high school to postsecondary education and the labor force. At the same time, HSLs:09 brings a new and special emphasis to the study of youth transition by exploring the paths that lead students to pursue and persist in courses and careers in the fields of science, technology, engineering, and mathematics (STEM), with particular focus on mathematics and science as critical domains of the high school curriculum. There is precedent for giving special emphasis to science and math—as was done in NELS:88, for example, which included science and mathematics teacher surveys in grades 8, 10, and 12; a cognitive test battery that measured both science and math achievement at grades 8, 10, and 12; in addition to special items on the student questionnaire. However, HSLs:09 goes more deeply into the choice factors and social-psychological mechanisms associated with science and math coursetaking in high school and later choice of postsecondary institutions and majors.

HSLs:09 is designed to measure math achievement gains in the first 3 years of high school, but also to relate tested achievement to students' choice, access, and persistence of courses, college, and careers, especially in STEM pipelines. The HSLs:09 assessment serves not just as an outcome measure, but also as a predictor of readiness to proceed into college and, in particular, STEM courses and careers, while tested achievement in mathematics can also be used as a baseline covariate in multivariate longitudinal

analyses. Interviews focus on factors that shape students' decision-making about courses and postsecondary options, including what factors, from parental input to considerations of financial aid for postsecondary education, enter into these decisions.

There are several reasons the transition into adulthood is of special interest to federal policy and programs. Adolescence is a time of physical and psychological changes. Attitudes, aspirations, and expectations are sensitive to the stimuli that adolescents experience, and environments influence the process of choosing among opportunities. Parents, educators, and those involved in education policy decisions all share the need to understand the effects that the presence or absence of good guidance from the school, in combination with that from the home, can have on the educational, occupational, and social success of youth.

These patterns of transition cover individual and institutional characteristics. At the individual level, the study examines education attainment and personal development. In response to policy and scientific issues, data have been gathered on the demographic and background correlates of education outcomes. By collecting extensive information from students, parents, school staff, and school records, it will be possible to investigate the relationship between home and school factors and academic achievement, interests, and social development at this critical juncture. Resources to assist in guiding parents and students through the college decision process, from information-seeking behaviors to filing financial aid forms, can be explored in terms of how they relate to college entry. Additionally, because the initial survey focused on 9th-graders, it also permits the identification and study of high school (and later, college) dropouts.

HSLs:09 is intended to be a general-purpose dataset; that is, it is designed to serve multiple policy objectives. Policy issues studied through HSLs:09 include the identification of school attributes and processes associated with mathematics achievement, college entry, and career choice; postsecondary access, choice, persistence, and attainment; the factors associated with dropping out of the education system; and the transition of different groups (e.g., racial and ethnic, gender, and socioeconomic status groups) from high school to postsecondary institutions and the labor market, and especially into STEM curricula and careers. HSLs:09 will provide a strong basis for investigators to inquire into students' attitudes, beliefs, expectancies, values, and goals. Researchers can investigate factors affecting risk and resiliency, gather information about the social capital available to sample members, inquire into the nature of student interests and decision-making, and delineate students' curricular and extracurricular experiences in both high school and higher education. HSLs:09 includes measures of school climate; each student's native language and language use; student and parental education expectations; attendance at school; course and program selection; college plans, preparation, and information-seeking behavior; interactions with teachers and peers; as well as parental resources and support. The HSLs:09 data elements are designed to support research that speaks to the underlying dynamics and education processes that influence student achievement, growth, and personal development over time.

HSLs:09 is first and foremost a longitudinal study; hence survey items are chosen for their usefulness in predicting or explaining future outcomes as measured in later survey waves. Compared to its earlier counterparts, there are considerable changes to the design of HSLs:09 that will limit the ability to produce trend comparisons. There are two such limiting factors in particular. One is that there was no sample freshening in HSLs:09. In consequence, there is no representative spring senior cohort (or sophomore cohort), but rather a fall 9th-grade cohort, unrepresentative of any other grade, followed over time. The second reason, closely related to the first, is that none of the data collection points in HSLs:09 correspond with the collection points in the prior secondary longitudinal studies (e.g., NELS:88 at grades 8, 10, 12, and two years after modal high school completion). At the same time, HSLs:09 and the prior studies alike deal with the same basic issues: the transition through high school and into the postsecondary world, represented primarily by education and work. Comparisons between HSLs:09 and the four earlier studies may be made at this higher level of generality. Comparisons cannot be made on the basis of data collections at the precise same grades (e.g., senior trends) and post-high-school time-points, since different collection points were used. The fact that precise grade/time-point comparisons cannot be made is of consequence for HSLs:09 in

that HSLs:09 has greater latitude in incorporating new interview items, given that the trend measurement requirement of asking the same thing in the same way as in previous studies is no longer of strict relevance.

In the second follow-up main study, in addition to sample member interviews, transcripts and financial aid student records will be collected from the postsecondary institutions attended by those HSLs:09 sample members who have enrolled in postsecondary education. 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.

Postsecondary Transcript Collection. The HSLs:09 PETS is the sixth in a series of postsecondary education transcript studies of high school cohorts; the first (NLS:72) took place in 1984, and was followed by HS&B sophomore cohort (1993), HS&B senior cohort (1986), NELS:88 (2000), and ELS:2002 (2013). Postsecondary education transcript studies have also been undertaken in connection with BPS and Baccalaureate and Beyond (B&B) longitudinal studies. A fundamental difference is that BPS and B&B are grounded in a nationally-representative sample of postsecondary institutions (NPSAS) while the high school studies are based on a grade-cohort-based secondary school sample. In addition, BPS captures all students entering postsecondary education, while the high school studies miss late entrants. Likewise, B&B is representative of baccalaureate recipients, while studies such as HSLs:09 and ELS:2002 (which lack both late entrants and late completers) are not.

As an official institution record, the postsecondary transcript is a more reliable source of data regarding academic performance than is a student's self-report. The transcript collection for HSLs:09, designed similarly to that conducted for ELS:2002 and BPS:04/09, will provide much-needed information on the course of study of today's college 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, file matching, and record abstraction will afford researchers the opportunity to analyze paths taken by cohort members as they begin undergraduate education. 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 secondary academic performance, plans and expectations, and pathways into the workforce of the sample members.

Financial Aid Records Collection. Despite access to federal aid databases, a complete picture of all non-federal inputs into student financial aid has been lacking in the secondary longitudinal studies, constituting a severe limitation in the postsecondary years of the survey. Availability of financial aid is important at all points in the postsecondary process (initial access and choice, persistence, transfer, and ultimate educational attainment). The financial aid data records collected from the institutions attended by HSLs:09 sample members will greatly increase the analytic power of HSLs:09 – cumulative aid and debt, generally at a midpoint through postsecondary education, can be calculated with the availability of scholarship, fellowship, grant, and loan amount. The financial aid record collection will also yield detailed information about students' enrollment patterns, degree or program of study and progress toward degree, and costs of attendance.

A.2.b HSLs:09 Research and Policy Issues

The second follow-up survey items serve to support the overall purposes of HSLs:09, which are to understand the factors (e.g., experiences, behaviors, attitudes, interactions with people) that influence students' decision-making processes about postsecondary enrollment and coursetaking, and occupation goals, and to understand how these decisions evolve in the years after secondary school, ultimately marking the transition to adult status (as seen in education attainment, career, family formation, etc.).

For those who have completed high school at the time of the second follow-up, the prime foci of the interviews will be labor market status of those who are working part- or full-time, and postsecondary entry, transfer, persistence, and sub-baccalaureate attainment. The second follow-up interview will also

update information on high school attainment for students who, as of the 2013 Update survey, had dropped out or were held back a grade or more in their secondary schooling. At the time of the second follow-up, the HSLs:09 cohort will be similar to members of the 2012/14 Beginning Postsecondary Students Longitudinal Study (BPS:12/14) first follow-up. BPS covers all postsecondary entrants, early and late, while HSLs:09 does not include late entrants but provides a comparison group that is not in postsecondary education. Such comparison draws on the fact that those HSLs:09 cohort members who start postsecondary education in the fall after modal high school graduation will have the same time spread between that time point and the HSLs:09 second follow-up survey as do BPS cohort members who started postsecondary education immediately after high school completion. In other words, both the BPS and the HSLs:09 immediate entrants are followed 3 years after first enrollment.

The draft HSLs:09 second follow-up interview appears as Appendix E of this submission. The primary research areas drive the survey instrument: (1) high school attainment; (2) postsecondary access and choice; (3) attainment of sub-baccalaureate credentials; (4) postsecondary education transfer and persistence; (5) career development; and (6) labor market experience. Each of these areas shall be separately discussed. Some additional subthemes that are represented in the interview will also be mentioned: marriage and family formation and the college experience.

1. High School Attainment

While information on high school completion is available for on-time graduates, the high school completion status of the remainder of the cohort must be addressed again in the HSLs:09 second follow-up. Dropouts, students who take extra time to complete secondary school, and students who earn alternative credentials (such as the GED), are of high policy interest. Prior round nonrespondents also need to have their enrollment data updated. The prior secondary longitudinal studies show large numbers of high school dropouts eventually achieving alternative credentials or returning to high school, while others remain without high school completion or equivalency even eight years after their cohort's modal graduation date. GED administrative records are also a possible source for this topic area, and have been collected for prior secondary longitudinal studies.

2. Access and Choice

Access to postsecondary education can be conceptualized in multiple ways, which are not necessarily mutually exclusive. Academic access, for example, is more limited for dropouts and for low-achieving students, while financial access speaks to the possible gaps between student resources and student aid programs. Access is also influenced by expectations and aspirations. Those with academic and financial access may choose to enroll in postsecondary education. Enrollment, in turn, is affected by factors that may enhance or inhibit choice: academic preparation (e.g., coursetaking, grades, and tested mathematics achievement); individual-level characteristics such as education and occupation or career aspirations or expectations; and family background characteristics such as family income, parental education, and educational expectations for their child.

Choice is sometimes characterized as the ability to attend an institution that is the best academic fit at an affordable price. Financial wherewithal is a key aspect of choice, not just in the sense of ability to pay, but also in terms of early perceptions of cost, which may affect both college preparation and the application process (which has been meticulously captured in the earlier rounds of HSLs:09). The degree of choice available to students affects the type and sector of postsecondary institutions attended (for example, 2-year versus 4-year public or private institutions); intensity of attendance (full- versus part-time); whether enrollment is at the "first choice" institution; and its location (urban, suburban, or rural; near home or distant). For students whose individual background and family resources enable a range of postsecondary education options, the concept of choice incorporates institutional characteristics such as the appeal of social and athletic environments and the academic prestige or ethos of a school.

3. Attainment of Sub-baccalaureate Credentials

The timing of the second follow-up does not provide a basis for studying baccalaureate attainment. However, the 3-year post-graduation gap offers a window into attainment of associates degrees, postsecondary certificates, and certifications. As well, the timing provides an opportunity to study the transition from community college settings to baccalaureate degree programs. This is a research issue to be vigorously pursued in the interview, and administrative data will be sought to further enhance the picture of sub-baccalaureate attainment.

4. Transfer and Persistence

Persistence, staying the course until graduation or certification, is clearly of great importance to HSLs:09—although the timing of this measurement within the secondary longitudinal studies has been an issue. Historically in HS&B, NELS:88, and ELS:2002, a basis for studying persistence has not been provided in the first measurement point past high school (two years), but at the end of the study (around age 26 for NELS:88 and ELS:2002) with multiple postsecondary interview data points and continuous coursetaking data from the postsecondary transcripts. Here, HSLs:09 will once more prove its singularity in the study series, given the 3-year post-graduation gap and the collection of postsecondary transcripts. As a result, HSLs:09 will provide highly timely and excellent information on early persistence in baccalaureate programs, and even better information about sub-baccalaureate persistence and attainment (both in school, and in major or field of study). The same may be the case for understanding progress through the curriculum and, relatedly, transfer and institutional mobility.

5. Career Development (*Major, Field of Study, and Employment History as Pathways into Career Formation*)

Career development is a natural focus for any longitudinal social capital study of young people, but it is given special salience by the HSLs:09 stress on STEM careers. Career status can be elicited from the context of the current job, and status and plans can also be represented through questions about the occupation or job expected at age 30. A perhaps richer tack to be considered for the construct of career status or plans is to be found in social-cognitive career theory. The main study will give due consideration to testing social cognitive measures for the HSLs:09 second follow-up. Based on the notion that people learn by observing others, social cognitive scales of the education domain (or of occupation/the work place) can be used to measure several key constructs, some that may complement and build on HSLs:09 prior data: self-efficacy, outcome expectations, occupational interests, work supports and barriers, domain satisfaction, and persistence intentions among them. Social cognitive career theory measures were developed for and included in the final follow-up of ELS:2002. Such measures would be stronger on the HSLs:09 second follow-up because they are ideally longitudinal: the outcomes of these predictors could be captured in future rounds.

6. Labor Market Experience

Labor market pathways of high school graduates and dropouts who do not participate in postsecondary education can be captured in the second follow-up. Some of the effects of job-related training and adult education can also be investigated at this juncture in HSLs:09. Recent history has seen a growing consensus about the sophisticated skill requirements of the “21st century workforce.” Along with the formal education training of workers, the new flexible workforce will need workers who are continuously learning new skills and competencies, some of which may be validated with formal professional licensure and certification. While postsecondary education and labor experiences are prime foci, it should be remembered that NELS:88 and ELS:2002 show that, at ages 20 and 26, a substantial number of student sample members (sometimes in the range of 10 percent) reported that they were engaged in neither school nor work for pay. Second follow-up items must also capture the activities and experiences of these individuals, some of whom are unemployed or stay-at-home parents.

7. Related Sub-themes: Marriage, Family; College Experience

Marriage and family formation is another marker of the transition to adulthood. Though this sub-theme warrants less interview space than the work and postsecondary education question series, it remains important to gather the basic facts of domestic arrangements, keeping in mind that work and education opportunities may in part be influenced or conditioned by constraints such as child care, or may be positively or negatively supported by marriage.

College Experience: Since this round marks the data collection in which most cohort members will be students in a postsecondary setting, it will be the preferred time to ask questions about the college experience. Just as students are influenced by their high school education experience, postsecondary settings exert peer and instructor influence, and reflect academic climate as well. The extent of students' engagement and time spent in college activities and its perceived contributions to students' overall development of knowledge and skills may also relate to students' subsequent career development and other life course outcomes. The college experience is a research area that may well support substantial numbers of questions that are new to the secondary longitudinal studies series.

Administrative Data Sources: Postsecondary Transcripts, Student Financial Aid Records, and Administrative Data Linkages. Researchers have found, in analyses of HS&B and NELS:88 PETS (e.g., Adelman 2006³), that “academic intensity of the student’s high school curriculum” counts importantly in providing momentum toward completing a bachelor’s degree. The administrative data sources for HSLs:09 will provide unique, empirical data on student coursetaking, performance, transfer, academic momentum and intensity, fields of study, and degree outcomes. Combined with student interview and high school transcript data, these data can create a rich analytic resource for the study of postsecondary education.

Transcripts. The HSLs:09 postsecondary transcript collection will include the same data elements as the previously-approved PETS in ELS:2002, B&B:08/09, and BPS:04/09, including: case information, schools and terms, academic honors, tests, degrees and majors, and courses. The list of data elements for the postsecondary education transcript study collection (PETS) can be found in Appendix F.

Financial Aid Records. The data elements for the financial aid record collection will be developed based on those collected for the ELS:2002 Financial Aid Feasibility Study and the National Postsecondary Student Aid Study (NPSAS). Availability of financial aid is important at all points in the postsecondary process (initial access and choice, persistence, transfer, and ultimate educational attainment). A facsimile of the student financial aid records instrument, including all of the data elements to be collected, can be found in Appendix H.

Administrative Data Linkages. Additional data for the HSLs:09 sample will be obtained from a variety of administrative data sources. These include queries of the Central Processing System (CPS), the National Student Loan Data System (NSLDS) containing Pell loan and grant files, the HiSET and GED testing services, vendors of national student admission tests including ACT and SAT and GRE scores, and vendors of voter registration data. The security procedures in place for the linkages to administrative data are presented in appendix B, and a description of the data security language for vendor contracts sources is provided in appendix C.

While HSLs:09 cannot produce national estimates of postsecondary transfers or address the pathways of late entrants, its link to high school data provides rich information on the antecedents and pathways of individuals entering postsecondary education fairly promptly after high school. Some research topics that can be addressed with the HSLs:09 administrative data include:

³ Adelman, C. (2006). “The Toolbox Revisited: Paths to Degree Completion from High School Through College” Washington, DC: US Department of Education.

- *Academic preparation* – As a longitudinal study, HSLs:09 is positioned to provide data on secondary school preparation and postsecondary outcomes. The combined interview and high school transcript data offer insight on the academic preparation of students, including the courses they took and their performance. Postsecondary transcripts and financial aid records will add data on subsequent coursetaking and performance, creating opportunities to study the student academic experience over time.
- *Transfer* – By collecting transcripts from all postsecondary institutions sample members are known to have attended, the study enables analysis of the movement of students and credits between institutions. Example research questions include “How prevalent is student transfer between institutions, including co-enrollment, and how are credits transferred between institutions? How does transfer impact student outcomes?”
- *Coursetaking* – Analysis of transcripts across the student sample provides insights on postsecondary education offerings and student coursetaking. Frequencies of courses in particular topic areas can be examined, such as STEM, occupational, or remedial courses. Coursetaking data can be combined with data on student program type, level (e.g., freshman), degree attainment, school sector, and a variety of other variables to gain insight into how coursetaking varies across student and institution types. Additional course data, such as credits earned or attempted and grade point averages in selected topic areas can give further insights into performance and progress of the study population. Example research questions include “How does coursetaking vary for students at public, private non-profit, and private for-profit institutions, or at 4-year, 2-year, and less-than-2-year institutions? How does coursetaking influence persistence and other student outcomes?”
- *Academic performance* – Transcripts provide more detailed data on academic performance than can be collected from any other source. Grade data from transcripts can be used to examine performance in specific subject areas or in selected time periods (e.g., 1st year students). Grade data can be combined with degree attainment, stop-out, transfer, interview data (such as employment and income), or student records data (such as enrollment intensity and GPA) to create a more detailed picture of how academic performance relates to progress and student outcomes.
- *Credit accumulation* – Similar to academic performance, transcripts and student records provide a unique opportunity to analyze student credit accumulation. Credit accumulation can be measured across institutions and across time, enabling analysis of concepts such as enrollment intensity (i.e., full-time or part-time enrollment) and time to degree. How much does part-time enrollment delay degree completion, and does it decrease the likelihood of earning a degree? Transcript data provide an additional dimension to the analysis of time to degree and persistence, introducing the added detail of how credits were earned during the time a student was enrolled.
- *“Events”* – Transcripts and student records provide empirical evidence of events in postsecondary enrollment such as stop-outs, transfers, summer or dual enrollment periods, and other phenomena that are difficult to capture or measure solely with self-reported data. Patterns of attendance, such as swirling or moving from 2-year to 4-year institutions, can also be analyzed.

A.3 Use of Information Technology

The website for data collection will reside on NCES’ SSL-encrypted servers. HSLs:09 will use web-based interviews across three modes of data collection—self-administered surveys and surveys administered by telephone and field interviewers—and will be made mobile-friendly to allow participants to complete the full survey on a tablet or smartphone. On a nightly basis, the data collection contractor, RTI, will download interview data, in batches, to its Enhanced Security Network (ESN) via a secure web service. Once in the ESN, data will be cleaned and undergo quality analysis.

In the main study, data will be collected from the postsecondary institutions attended by HSLs:09 sample members. These institutions will be identified as part of the 2016 main study survey. For the transcript and financial aid records collections to be conducted in 2017, institutions will receive an announcement in which institution staff will be invited to access the NCES postsecondary data portal website, where they will find information on the purposes of the collections, along with forms and instructions, FAQs, endorsements, legal authority, and how to contact project staff. To access restricted pages containing personal information, the user will be required to log in by entering an assigned ID number and password. Once each task is completed, institution staff will no longer be able to access it, but a status screen will indicate which stages of data collection have been completed.

A.3.a Postsecondary Transcripts: HSLs:09 PETS

Information technology will be employed in the collection of postsecondary transcripts and course catalogs from the institutions attended by HSLs:09 sample members. As a first step, RTI will collect course catalogs for and postsecondary transcripts from institutions where HSLs:09 cohort members were enrolled. College Source Online will be the initial source of catalogs. Any institutions for which catalogs cannot be obtained in that manner 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. Postsecondary transcripts will be requested from all institutions known to have been attended by the sample member since high school, and can be transmitted via upload, electronic fax, and other secure means (section B.3.e includes a description of each method). The first phase involves institutions reported by sample members and will begin with a small subset of the institutions before sending requests to the rest of the institutions. The second phase involves reviewing postsecondary transcripts collected during phase one, identifying new student-institution linkages, and following up with the new institutions so identified.

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 are assembled into data files for subsequent analysis.

A.3.b. Student Financial Aid Records Collection: HSLs:09 FAR

To ensure the efficiency, quality, and ease of the student financial aid records collection, HSLs:09 will use a web-based application. Multiple options will be offered to an institution 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.

An online video tutorial will be available to show users exactly how to navigate through the application and help screens will provide users with more in-depth explanations of the required items. The web-based application will allow error checking to be performed immediately by institution staff. An important feature of the online application is that 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.

A.4 Efforts to Identify Duplication

Since the inception of its secondary education longitudinal studies program in 1970, NCES has consulted with other federal offices to ensure that the data collected in this important series of longitudinal studies do not duplicate the information from any other national data sources within the U.S. Department of Education or other government agencies. In addition, NCES staff members regularly consult with nonfederal associations such as the College Board, American Educational Research Association, the American Association of Community Colleges, and other groups to confirm that the data to be collected through this study series are not available from any other sources. Furthermore, consultations are also provided through

the HSLs:09 Technical Review Panel (TRP), which continues to provide methodological insights from the results of other studies of secondary and postsecondary students and labor force members. In addition, these consultations ensure that the data collected through HSLs:09 will meet the needs of the federal government and other interested agencies and organizations. Other longitudinal studies of secondary and postsecondary students (e.g., NELS:88, ELS:2002, BPS, B&B) have been conducted by NCES in the past. HSLs:09 builds on, extends, or complements these studies rather than duplicating them.

First, current efforts explicitly complement the redesign of NPSAS and BPS with the instrumentation and design of HSLs:09. Second, design articulation with prior NCES secondary longitudinal studies (though more limited for HSLs:09 than for prior secondary longitudinal studies) also show coordination, not duplication. These earlier studies were conducted during the 1970s, 1980s, 1990s, and the early 2000s and represent education, employment, and social experiences and environments different from those experienced by the HSLs:09 student sample. In addition to extending prior studies temporally as a time series, HSLs:09 extends them conceptually. Unlike preceding secondary longitudinal studies, HSLs:09 provides data that are necessary to understand the role of different factors in the development of student commitment to attend higher education and then to take the steps necessary to succeed in college (taking the right courses, taking courses in specific sequences, etc.). Also, HSLs:09 focuses on the factors associated with choosing and persisting in mathematics and science coursetaking and STEM careers. These focal points present a marked difference between HSLs:09 and its predecessor studies.

While National Science Foundation studies such as the Survey of Recent College Graduates cover some of the same ground as the postsecondary rounds of HSLs:09, the NSF effort is more narrowly focused, does not follow a nationally representative sample of secondary school students, and thereby does not provide measures of outcomes of secondary education experiences. Additionally, NSF was actively involved in the design stage of HSLs:09 and provided financial assistance for augmentations of certain state public high school samples so as to provide a robust and representative basis for analyses with a subset of states.

The only other dataset that offers so large an opportunity to understand the key transitions into postsecondary institutions or the world of work are the Department of Labor's (Bureau of Labor Statistics) National Longitudinal Survey of Youth 1979 and 1997 cohorts (NLSY79, NLSY97). However, the NLSY youth cohorts represent temporally earlier cohorts than HSLs:09. There are also important design differences between NLSY79/ NLSY97 and HSLs:09 that render them more complementary to each other rather than duplicative. NLSY is a household-based longitudinal survey, while HSLs:09 is school-based. For both NLSY cohorts, Armed Service Vocational Aptitude Battery (ASVAB) test data are available, but there is no longitudinal high school achievement measure. Although NLSY97 also gathers information from schools (including principal and teacher reports and high school and postsecondary transcripts), given its household sampling basis, it cannot study school processes in the same way as HSLs:09. Any given school contains only one to a few NLSY97 sample members, a number that constitutes neither a representative sample of students in the school nor a sufficient number to provide within-school estimates. Thus, although both studies provide important information for understanding the transition from high school to the labor market, HSLs:09 is uniquely able to provide information about education processes and within-school dynamics and how these affect both school achievement and ultimate labor market outcomes, including outcomes in STEM education and occupations, whereas NLSY:97 is uniquely able to construct continuous labor market event histories for decades past high school graduation.

A.5 Method Used to Minimize Burden on Small Businesses

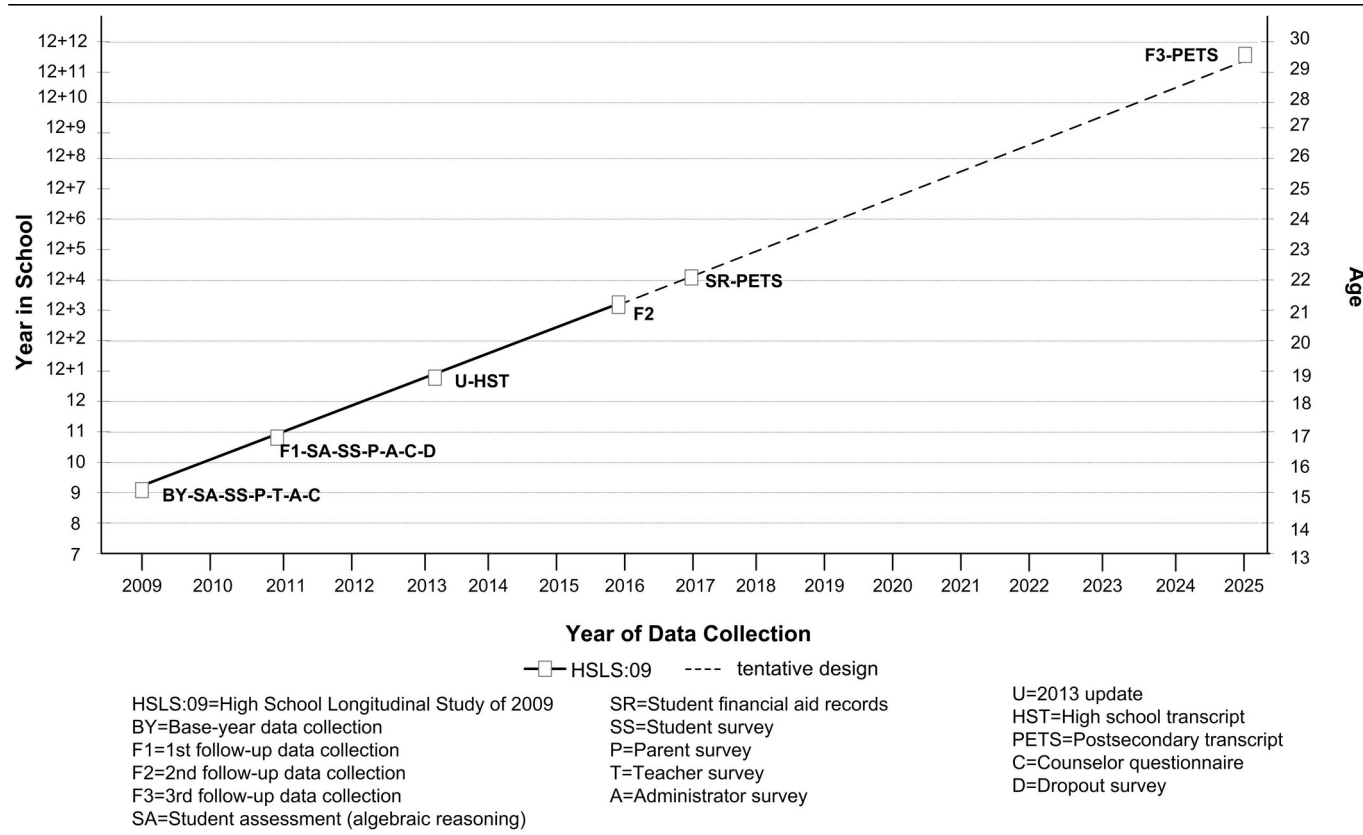
Target respondents for HSLs:09 second follow-up interviews and panel maintenance are individuals and the data collection activities will not involve burden to small businesses or entities. For the postsecondary transcript and financial aid record collections, some small for-profit schools and other small public and private schools will be contacted. Burden on these schools will be minimized by working closely with a school-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 a public online resource when available. To accommodate any constraints imposed by record-keeping systems, schools will be offered alternative methods of providing the requested transcripts and financial aid student records as described above in section A.3.

A.6 Frequency of Data Collection

Exhibit A-2 documents the periodicity of HSLs:09 at the within-study level.

Exhibit A-2. Longitudinal design for the HSLs:09 ninth-grade cohort: 2009–25



Data collection frequency has two dimensions. One is the frequency of launch for each multi-year longitudinal study, including both the predecessor and successor studies to HSLs:09. The second is the number and temporal distance of the data collection rounds within a given longitudinal study, hence placement of the data collection rounds in HSLs:09 (as illustrated in Exhibit A-2).

Since NLS:72 in 1972, periodicity at the study level has been basically one secondary longitudinal study per decade. Since the inception of ECLS-K in 1998-99, an early childhood panel has been added at a similar level of frequency. A new addition, the Middle Grades Longitudinal Study of 2017-18 (MGLS:2017) will soon be launched. MGLS:2017 will fill a critical gap in information on middle grades experiences. Regardless of whether it is practical at this time to implement an integrated comprehensive multi-cohort sequence for its longitudinal studies series, the decennial frequency of the secondary series would likely need to be similar to the historical experience that has worked so well in the past.

The 2016 student post high school graduation follow-up of HSLs:09 takes place a year later than the 2-year interval employed with HS&B, NELS:88, and ELS:2002. The three-year gap, however, offers better articulation with BPS, and facilitates getting sub-baccalaureate attainment data collected in a timely fashion and in greater detail. Since final outcomes will not be available until the (tentatively planned) 2025 round—including baccalaureate attainment—it is very much of interest to maximize the data that are

available early on, which will include, in addition to broad postsecondary access and choice data, early sub-baccalaureate outcomes and early community college to 4-year college transition. The additional year will extend the richness of the available postsecondary outcomes data to be released in 2017, and will do so in a manner that provides a basis for postsecondary education transcript data collection and use of the postsecondary transcript and financial aid data in analysis.

Despite the changes in data collection points in HSLs:09, compared to predecessor secondary longitudinal studies, and despite the fact that HSLs:09 represents only a single (and unique) cohort (there was no freshening to achieve nationally representative samples in later rounds), HSLs:09 will support comparisons at a higher level of generality (modeling the transition to adult status). The same key transitions, albeit with slightly different data collection points and content, will be captured with the HSLs:09 data, as have been captured through the prior studies.

A.7 Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

A.8 Consultations Outside NCES

A panel of highly qualified substantive and methodological experts was invited to provide advice about the design and conduct of the HSLs:09 second follow-up. The first meeting with the HSLs:09 TRP was held on October 15-16, 2014, and included ten non-federal panelists as well as members of NCES and other offices within the U.S. Department of Education and the federal government. A second TRP meeting took place on August 18-19, 2015. Feedback from this convening has been used as part of the planning for the main study design. TRP meeting invitees are listed in Appendix A.

In addition, suggestions on specific items for the Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ) domain were provided by content experts from members of the Gay, Lesbian & Straight Education Network (GLSEN), the Fenway Institute, and the Gender Identity in US Surveillance (GeniUSS) group. Items proposed for the LGBTQ domain came from a variety of sources, including the CDC's Youth Risk Behavior Survey (YRBS), the Massachusetts Department of Public Health's Youth Health Survey, and the NICHD's National Longitudinal Survey of Adolescent Health, among others. Further consultation on these questions was also sought with the CDC.

A.9 Provision of Payment or Gift to Respondents

Incentives are proposed as part of the main study data collection plan for two purposes - to encourage early response and to minimize nonresponse. The use of incentives provides significant advantages to the government in terms of increased overall response rates and timely data collection, which in turn, result in decreased data collection costs and more complete data. The proposed incentive for completed interviews in the second follow-up main study is estimated to be an average of \$35 per interview, with the exact amount(s) offered to be determined based on results of both the field test experiments and the main study calibration sample experimentation. In the main study, a portion of sample members will be divided into three smaller sub-samples, which will be fielded in advance of the main sample. These *calibration samples* will be used to test a number of conditions for baseline promised incentives and incentive boosts, and will be used to determine the optimal incentive amounts to be offered to the remaining sample. The Tests of Procedures and Methods section of the Supporting Statement Part B document (section B.4) discusses the details of the proposed incentive amounts, the experimental design, and responsive design methods (including non-monetary interventions) to be employed in the main study. Sample members will be offered a choice of receiving their incentive by check or Paypal, which has been successfully tested as part of the NPSAS:16 field test.

Institutions will be offered reimbursement for the cost of preparing and sending transcripts and student records at the school's standard rate. If additional costs are incurred by the schools, such expenses will be reimbursed to the extent that they are reasonable and properly documented. Based on a similar

postsecondary transcript collection conducted for ELS:2002, it is expected that approximately 20 institutions will request and receive reimbursement for expenses for approximately 360 transcripts at an average cost of \$7 per transcript, and an average reimbursement of \$126 for those institutions. For the student financial aid record collection, it is expected that approximately 90 institutions will request and receive reimbursement at an average cost of \$200 per institution.

The 2018 panel maintenance will consist of a mailing to each sample member and his or her parent/guardian asking that they log onto the survey website to update contact information or that they complete a hardcopy address update (see appendix D). As in 2015, sample members will be offered a \$10 incentive for updating their contact information. Our experience has shown that offering such an incentive is an effective means of increasing panel maintenance and survey response.

A.10 Assurance of Confidentiality

NCES is authorized to conduct this study by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543). By law, all information collected as part of HSLs:09 may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).

The confidentiality pledge was updated for the panel maintenance activity as well as student records and transcript collection activities, subsequent to the HSLs:09 second follow-up data collection, and thus is reflected only in the panel maintenance materials in the revised Appendix D as well as the transcript materials in the revised Appendix F and the student records materials in the revised Appendix G to reflect the addition of the Cybersecurity Enhancement Act of 2015 provision. The revised pledge reads: “All of the information you provide may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).” The HSLs:09 second follow-up materials were not updated because they have already been used, given that these materials became operational prior to the implementation of the revised pledge. All panel maintenance materials (included in Appendix D), transcript materials (Appendix F), and student records materials (Appendix G) now include the revised pledge.

Confidentiality and data security protection procedures have been put in place for HSLs:09 to ensure that RTI International and its subcontractors comply with all privacy requirements, including:

1. The statement of work of this contract (ED-IES-14-C-0112);
2. *Family Educational Rights 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 Protection 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 International will comply with the Department of Education'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/>.

To further ensure that confidentiality is appropriately maintained at all times, vendors who assist in locating and tracing sample members will be required to follow procedures that 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; and specify the means by which information may be transmitted between RTI and the contractor.

The HSLs:09 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. HSLs:09 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.

There are security measures in place to protect data during file matching procedures. NCES has a secure data transfer system, which uses Secure Socket Layer (SSL) technology, allowing the transfer of encrypted data over the Internet. The NCES secure server will be used for all administrative data sources with the exception of the National Student Clearinghouse (NSC), which has its own secure File Transfer Protocol (FTP) site. All data transfers will be encrypted.

Furthermore, ED 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 ED 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 ED'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 ED will occur.

Sample member contact materials will describe the voluntary nature of HSLs:09 and convey the extent to which respondent identifiers and all responses will be kept confidential. Similarly, the scripts to be read by interviewers will be very specific in the assurances made to sample members and contacts. Contacting materials are presented in appendix D. The following confidentiality language is provided in the study brochure that is supplied to all sample members:

“NCES is authorized to conduct The High School Longitudinal Study of 2009 (HLS:09) second follow-up by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543).”

“NCES is required to follow strict procedures to protect personal information in the collection, reporting, and publication of data. All individually identifiable information supplied by individuals or institutions 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 (ESRA 2002, 20 U.S.C. §9573).”

“We have implemented strict procedures to protect provided information:

- All electronic data are maintained in secure and protected data files, and all personally identifying information is kept in files separate from the descriptive information.
- No data released to the general public will identify individual respondents.
- All project staff with any access to study data are liable to severe fines and imprisonment for any disclosure of individual responses.
- These procedures comply with all applicable federal laws.”

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 HLS:09 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.

HLS:09 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.

Appendix F includes a *Family Educational Rights and Privacy Act Fact Sheet*, which provides institutions with the text of the FERPA requirements. The fact sheet includes highlighted passages that indicate the sections that authorize the transcript and financial aid records collections, and will be included in the packet sent to all institutions from which student data are requested.

Additionally, the study, 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 calls 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 to be gained from the study is important enough to justify the waiver. These linked data for HSLs:09 will provide invaluable data to researchers and education policy makers about access to and persistence in postsecondary education and the early employment activities of young adults in the years beyond high school. Rather than ask sample members for certain data

elements (e.g., financial aid received, admissions test scores), these data will be obtained through matches to administrative records which will yield more accurate and complete data.

A.11 Sensitive Questions

The HSLs:09 second follow-up interview collects information about earnings, assets, and marital and family status. Regulations governing the administration of these questions require (a) clear documentation of the need for such information as it relates to the primary purpose of the study, (b) provisions to clearly inform sample members of the voluntary nature of participation in the study, and (c) 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, assets, indebtedness, and long-range employment outcomes is central to understanding key policy issues driving this study. Financial assets and obligations can play an important role in student persistence in, and completion of, postsecondary education programs. In addition, information about income, earnings, and assets provides vital labor force variables and important indicators of the rate of return of educational experiences to the respondent.

The collection of information about marital and family status also facilitates the exploration of key policy issues. Social and economic support provided by spouses can play an important role in students enrolling and persisting in postsecondary education and the successful transition to employment. Financial and family-related obligations also influence decisions about employment and additional education, so it is important to collect information about marital status and dependents.

It is critical that respondents can be found at a later date for follow-ups in this longitudinal study; therefore, the survey requests follow-up locating information for sample members, their parents, and another contact. Sample members are also asked to provide their SSN, but are reminded that providing the information is voluntary. Additionally, the Office of Civil Rights is seeking to better understand LGBTQ students who have been a target of bullying. To help address this, the HSLs:09 survey will include questions on sexual orientation and gender identity. The survey may also include questions related to traumatic experiences that may affect the outcomes HSLs:09 is interested in, but a decision on whether or not they will be included will be reached after the TRP meeting in August 2015. The self-administered environment of the web survey ensures privacy for the HSLs:09 respondents, but for those respondents interviewed over the phone or in the field, measures will be taken to reduce risks. Respondents will be assured at all stages of the recruiting and interviewing process that the information they provide is voluntary and protected. To minimize discomfort to sample members during in-person field interviews, the interviewer may allow the respondent to enter responses directly into the interviewer’s computer to ensure his or her privacy. The questions that will be included in the HSLs:09 second follow-up main study are provided in Appendix E.

A.12 Estimates of Response Burden

Estimates of response burden for the HSLs:09 second follow-up data collections are shown in Exhibit A-3. Estimates of survey response burden are based on estimates developed from experience with prior HSLs:09 interviews, including the second follow-up field test, as well as experience on other education longitudinal studies (e.g., ELS:2002, BPS:12/14). It is expected that the main study survey will take an average of 35 minutes to complete. For the proposed follow-up panel maintenance in 2018, sample members will be asked to provide updated contact information. We have estimated that the burden for completing the 2018 panel maintenance will be the same as the burden estimated for the 2015 panel maintenance.

Exhibit A-3. Estimated burden for HSLs:09 second follow-up

Data collection activity	Sample	Expected response rate	Number of respondents	Number of responses	Average burden per response (minutes)	Total burden (hours)
<i>Survey and address data collection from individuals</i>						
Field test interview	1,100	64%	704	704	35	411

Field test re-interview	100	50%	50	50	10	8
Main study interview	23,316	90%	20,984	20,984	35	12,241
Main study sample panel maintenance 2015	23,316	20%	4,663	4,663	5	389
Main study sample panel maintenance 2018	23,316	20%	4,663	4,663	5	389
Main study totals			25,647	25,647		12,630
<i>Records data collection from institutions</i>						
Postsecondary transcript collection	3,800	85%	3,230	3,230	30	1,615
Financial aid records collection	3,800	85%	3,230	3,230	198	10,659
Records collections totals			6,460	6,460		12,274
Total Burden			32,107	32,107		24,904

Note: This request is for the main study survey, 2018 panel maintenance, and the transcript and financial aid record collections. The rows in grey were previously approved; field test data collections have concluded, and the 2015 panel maintenance is ongoing.

For the postsecondary transcript and financial aid records collection, the total number of postsecondary institutions attended by sample members is estimated to be 3,800. Using eligibility and participation rates observed in the ELS:2002 postsecondary transcript data collection, an expected 98 percent of the estimated 3,800 schools will be eligible and approximately 3,230 postsecondary institutions (approximately 87 percent) will provide transcripts and financial aid data (see section B.2.b). The response time for institutions participating in transcript collection is expected to vary depending on the number of sampled students who attend the institution and the method selected for transmitting the transcripts. It is expected that some of the transcripts collected will indicate enrollment at additional institutions. Transcripts from any additional institutions identified in the review of transcripts will also be collected. The estimated average time to provide postsecondary transcripts is approximately 0.5 hours per institution.

Student financial aid records will also be collected from each postsecondary institution identified. There are three methods of data collection available for providing student financial aid records data, one involves keying data directly into a secure Web application and two involve preparing data and then uploading them to a website (section B.3 includes a description of each method). The estimated average time to provide financial aid records is approximately 3.3 hours per institution.

The total estimated burden time cost to individual survey respondents is \$227,845 (12,630 burden hours at an \$18.04 hourly rate⁴). The total estimated cost to institutions for the records data collection is \$496,729 which represents the 12,274 burden hours at an hourly rate of \$40.47⁵.

A.13 Estimates of Cost Burden to Respondents

There are no capital, startup, or operating costs to respondents for participation in the project. No equipment, printing, or postage charges will be incurred.

A.14 Costs to the Federal Government

Estimated costs to the federal government for HSLs:09 are shown in Exhibits A-4a and A-4b. The estimated costs for the field test are presented separately. Included in the contract estimates are all staff time, reproduction, postage, and telephone costs associated with the management, data collection, analysis, and reporting for which clearance is requested.

⁴ The hourly rate was obtained by taking the average of the median weekly earnings of full-time wage and salary workers among high school graduates with no college and individuals with some college or an associate's degree; per Table 5 - Quartiles and selected deciles of usual weekly earnings of full-time wage and salary workers by selected characteristics, 3rd quarter 2014 averages, not seasonally adjusted. <http://www.bls.gov/news.release/pdf/wkyeng.pdf>.

⁵ 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 code: Operations Research Analysts (15-2031); accessed on August 22, 2016.

Exhibit A-4a. Total costs to NCES

Costs to NCES	Amount
Total HSLs:09 second follow-up costs	\$16,755,907
Salaries and expenses	\$300,000
Contract costs	\$16,455,907
Field test (2015)	\$2,435,026
Salaries and expenses	\$150,000
Contract costs	\$ 2,285,026
Main study (2016)	\$14,320,881
Salaries and expenses	\$150,000
Contract costs	\$ 14,170,881

NOTE: Field test costs represent Task 3 and two-fifths of Task 1 (representing two of the five years of the contract). Main study costs include tasks 2, 4, 5, 6, and three-fifths of Task 1. Panel maintenance in 2018 is not yet contracted and is not included in these costs.

Exhibit A-4b. Total contract costs

Task 1 – Management	\$ 1,367,965
Task 2 - Panel Maintenance for HSLs: 09 Second Follow-Up ⁶	\$ 569,092
Task 3 - Field Test (FT)	\$ 1,737,840
Task 4 – Main Study Data Collection	\$ 6,759,209
Task 5 - Student Financial Aid Records Collection	\$ 2,218,028
Task 6 - Postsecondary Transcript Collection	\$ 3,803,773
Total	\$ 16,455,907

A.15 Reasons for Changes in Response Burden and Costs

The apparent increase in respondent burden for this collection is due to the fact that the previous OMB approval was for the second follow-up field test interview and 2015 panel maintenance activities, while this request is for the HSLs:09 Second Follow-up Main Study interviews in 2016, the transcript and student financial aid records collections in 2017, and panel maintenance activities in 2018.

A.16 Publication Plans and Project Schedule

The contract for HSLs:09 requires the following reports, publications, or other public information releases:

- First Look reports (descriptive summaries of significant findings for dissemination to a broad audience);
- Detailed data file documentation describing all aspects of the main study design and data collection procedures, including an appendix summarizing the methodological findings from the field test; and
- Complete data files and documentation for research data users in the form of both restricted-use and public-use data files.

The operational schedule for the HSLs:09 second follow-up is shown in Exhibit A-5.

Exhibit A-5. Operational schedule for HSLs:09 second follow-up

HSLs:09 activity	Start date	End date
Field Test (FT) Data Collection		
FT Instrument Development and System Support	7/1/2014	4/10/2015
FT Cognitive Interviews	11/26/2014	3/6/2015
FT Web/CATI Training	2/28/2014	4/9/2015
Conduct FT Tracing	1/21/2015	7/30/2015

⁶ Includes costs for 2015 panel maintenance only. Panel maintenance in 2018 is not included.

HSLs:09 activity	Start date	End date
FT Data Collection	4/13/2015	7/17/2015
FT Data Files	4/13/2015	8/28/2015
FT Reporting	5/25/2015	4/13/2016
FT Experiment and Responsive Design	6/1/2015	1/15/2016
Second Follow-up Main Study (MS) Data Collection		
Cognitive Interviews 2	5/20/2015	9/28/2015
MS CATI Training	1/18/2016	11/11/2016
MS CAPI Training	6/28/2016	10/14/2016
MS Tracing	4/18/2016	12/15/2016
MS Web/CATI Data Collection	3/28/2016	1/31/2017
MS CAPI Data Collection	8/8/2016	1/31/2017
MS Data File Documentation (DFD)	10/26/2016	11/27/2017
MS Data Files	6/16/2016	12/13/2017
MS First Look Report	11/25/2016	12/13/2017
Student Financial Aid Records Collection		
Financial Aid Records Collection	3/7/2017	12/29/2017
Financial Aid Records Training	4/17/2017	4/21/2017
Financial Aid DFD	12/8/2017	12/30/2018
Financial Aid Data Files	9/24/2017	12/30/2018
Financial Aid First Look	11/12/2017	12/30/2018
Postsecondary Transcript Collection		
Transcript Collection	3/7/2017	5/31/2018
Transcript Training	4/17/2017	4/21/2017
Transcript DFD	12/8/2017	12/30/2018
Transcript Data Files	4/20/2017	12/30/2018
Transcript First Look	11/12/2017	12/30/2018

A.17 Approval to Not Display Expiration Date for OMB Approval

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

A.18 Exceptions to Certification for Paperwork Reduction Act Statement

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