

# 2017-18 NATIONAL POSTSECONDARY STUDENT AID STUDY ADMINISTRATIVE COLLECTION (NPSAS:18- AC)

Supporting Statement Part A

OMB # 1850-0666 v.21

Submitted by  
National Center for Education Statistics  
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## **A. Justification**

### **1. Circumstances Making Collection of Information Necessary**

#### **a. Purpose of this Submission**

This request is to conduct the 2017-18 National Postsecondary Student Aid Study, Administrative Collection (NPSAS:18-AC). This study is being conducted by the National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES), part of the U.S. Department of Education. The primary contractor for this study is RTI International (Contract# ED-IES-13-C-0070). Subcontractors for NPSAS:18-AC include Coffey Consulting; HR Directions; KForce Government Solutions, Inc.; Research Support Services; and Strategic Communications, Inc. Dr. Anthony Jones is a consultant for the study.

This submission covers materials and procedures related to enrollment list collection, student record abstractions, and matching to administrative data files as part of the NPSAS:18-AC data collection. The materials and procedures are based on those developed for previous institution-based data collections, including the 2015-16 National Postsecondary Student Aid Study (NPSAS:16) [OMB #1850-0666 v.17], the 2012 Beginning Postsecondary Students Longitudinal Study (BPS:12) student record collection [OMB #1850-0631 v.10], and the High School Longitudinal Study of 2009 (HSLS:09) student record collection [OMB #1850-0852 v.17].

NPSAS is a nationally representative study of how students and their families finance education beyond high school. The first NPSAS was implemented by NCES during the 1986-87 academic year to meet the need for national data about significant financial aid issues. Since 1987, NPSAS has been fielded every 3 to 4 years, most recently during the 2015-16 academic year (NPSAS:16). This submission is for NPSAS:18-AC, which departs from the design of previous NPSAS studies in three respects:

- (1) it will include state-representative estimates for undergraduate students overall and in public 2-year and public 4-year institutions;
- (2) it will provide financial aid estimates 2-years earlier than how the studies were previously scheduled; and
- (3) it will be the first NPSAS study without a student interview component.

Future NPSAS collections will continue to include a student interview every four years (NPSAS:16, NPSAS:20, NPSAS:24) to yield nationally representative data. In alternating cycles, an Administrative Collection (NPSAS:18-AC, NPSAS:22-AC, and NPSAS:26-AC) will be conducted in which only administrative data from the Department's data systems and institutional student records will be compiled to yield state representative data.

This submission includes

- a list of individuals on the NPSAS:18-AC Technical Review Panel (TRP) (appendix A);
- a list of institutions and associations endorsing and supporting NPSAS:18-AC (appendix B);
- a description of the confidentiality procedures in place for the administrative record matching (appendix C);
- contacting materials for institution staff providing student records (appendix D); and
- the student records abstraction instrument (appendix E).

While changes to this submission are not anticipated, if NCES or its data collection contractor is unable to secure an agreement with any of the listed desired administrative data providers, a change request will be submitted by December 17, 2018 to update the listing of matched data sources.

**b. Legislative Authorization**

NPSAS:18-AC is conducted by NCES in close consultation with other U.S. Department of Education offices, federal agencies, and organizations (see sections A.4 and A.8 of this document). NPSAS is authorized under the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543) and the Higher Education Opportunity Act of 2008 [HEOA 2008, 20 U.S.C. §1015(a)(k)]:

“Student aid recipient survey

- (1) Survey required: The Secretary, acting through the Commissioner for Education Statistics, shall conduct, on a State-by-State basis, a survey of recipients of Federal student financial aid under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42—
  - (A) to identify the population of students receiving such Federal student financial aid;
  - (B) to describe the income distribution and other socioeconomic characteristics of recipients of such Federal student financial aid;
  - (C) to describe the combinations of aid from Federal, State, and private sources received by such recipients from all income categories;
  - (D) to describe the—
    - (i) debt burden of such loan recipients, and their capacity to repay their education debts; and
    - (ii) the impact of such debt burden on the recipients’ course of study and post-graduation plans;
  - (E) to describe the impact of the cost of attendance of postsecondary education in the determination by students of what institution of higher education to attend; and
  - (F) to describe how the costs of textbooks and other instructional materials affect the costs of postsecondary education for students.
- (2) Frequency: The survey shall be conducted on a regular cycle and not less often than once every four years.
- (3) Survey design: The survey shall be representative of students from all types of institutions, including full-time and part-time students, undergraduate, graduate, and professional students, and current and former students.
- (4) Dissemination: The Commissioner for Education Statistics shall disseminate to the public, in printed and electronic form, the information resulting from the survey.”

**c. Prior NPSAS Studies**

As noted above, NPSAS:18-AC will be the tenth NPSAS in a series dating back to 1987. Since its inception, the data collection techniques, sources, and sampling and weighting methods used for NPSAS have changed to meet increasing demand for precise and detailed information to inform postsecondary student financial aid policy. The first in the series, NPSAS:87, was based on a sample of 40,000 students enrolled in the fall term of 1986. NPSAS:90 expanded the sample to students enrolled at any time during a full academic year, so that students enrolled only during the summer or spring terms, as well as those who began at any time in institutions not on a traditional calendar system (primarily vocational institutions), were included. NPSAS:90 also introduced computer-assisted telephone interviewing and incorporated data from the federal Pell Grant payment file.

NPSAS:93 enabled institutions to enter student records electronically, and NPSAS:96 added as data sources the Central Processing System (CPS) for federal financial-aid applications, the National Student Loan Data System (NSLDS), and SAT and ACT student test scores. NPSAS:2000 dropped the parent interview and expanded the sample size to 60,000 students. NPSAS:04 introduced a self-administered web-based

student interview option, further increased the sample size to 110,000 students, and, for the first time, oversampled undergraduate students in 12 states to permit state-representative estimates for those states. NPSAS:08 retained state-representative oversamples for six states, enlarged the sample size to 130,000 students, and added the National Student Clearinghouse (NSC) as an administrative data source.

NPSAS:12, in response to the growing for-profit sector and to ensure reliable estimates at all institution levels, dropped the state-representative samples, but added separate sampling for all levels of the for-profit sector: less-than-2-year, 2-year, and 4-year institutions. In addition, NPSAS:12 was the first cycle to use current-year 12-month institutional enrollment data to ensure more accurate poststratification (weighting) than was achieved using prior-year enrollment data. NPSAS:16 expanded the institution sampling sectors to include a sector for public 4-year institutions that are primarily sub-baccalaureate and added an administrative match to the Veterans Benefits Administration (VBA). Additional details about each of the prior NPSAS studies and related longitudinal studies conducted by NCES are provided at <http://nces.ed.gov/surveys/npsas/>.

Since NPSAS:96, the study has been conducted every four years and has included administrative file matching, student records collected from postsecondary institutions, and a student interview. NPSAS:18-AC will be unique in three respects. First, NPSAS:18-AC is the first NPSAS study to be conducted at the midway point in a typical 4-year NPSAS cycle. The reduced time between NPSAS collections will meet the demand among researchers and policymakers for more frequent and timely data. Second, NPSAS:18-AC will be the first NPSAS study to provide state-level estimates of undergraduate students for all 50 states, the District of Columbia, and Puerto Rico. Third, NPSAS:18-AC will be the first NPSAS study with no student interview and will collect data solely from postsecondary institutions and administrative sources.

## **2. Purposes and Uses of the Data**

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

### **a. NPSAS:18-AC Purposes**

The fundamental purpose of NPSAS is to create a research data set that brings together information about a variety of programs for a large sample of undergraduate and graduate students. NPSAS provides the data for comprehensive descriptions of the undergraduate and graduate student populations in terms of their demographic characteristics, academic programs, types of institutions attended, and attendance patterns. Demographic and enrollment data establish the appropriate context that allows researchers and policy analysts to address basic issues about postsecondary affordability and the recipients of student financial assistance. These results are presented in multiple publications.

Historically, NPSAS studies shed important light on the ways in which students and their families financed postsecondary education at the *national* level. However, state-level analyses have proven difficult as past NPSAS iterations largely did not allow for state-level estimates (and, when they did, the number of applicable states was limited). Now for the first time, NPSAS:18-AC will provide researchers and policymakers the ability to create state-level undergraduate estimates for all 50 states, the District of Columbia, and Puerto Rico, enabling analysis nationally and within these varied state contexts as well.

While prior cycles of NPSAS have included a student interview, NPSAS:18-AC is solely reliant on administrative data sources. The administrative data sources for NPSAS:18-AC will be the National Student Loan Data System (NSLDS), Central Processing System (CPS) including the Free Application for Federal Student Aid (FAFSA), National Student Clearinghouse (NSC), Veterans Benefits Administration (VBA), ACT and SAT test scores, and student records obtained directly from postsecondary institutions<sup>1</sup>. Prior NPSAS studies have incorporated these administrative data sources, and they have proven a valuable tool in better reflecting the experience of NPSAS respondents. Many of the items typically collected in the student interview can be derived from these administrative data sources. That said, certain data points, which primarily come from a student interview, (e.g., employment and earnings, private loans, questions surrounding student educational experiences) will not be directly available in NPSAS:18-AC.

Ultimately, data collected via NPSAS:18-AC will make important contributions to studies of postsecondary education policy at the federal and state level. The data can be used to calculate statistics with PowerStats, QuickStats, and TrendStats, web-based software applications available to the public at <http://nces.ed.gov/datalab>, and to qualified researchers through the IES restricted-use data licensing program (<https://nces.ed.gov/pubsearch/licenses.asp>). The data collected will also be used to generate data feedback reports, which will be distributed to participating institutions, state agencies, and associations. These publications will include data and figures comparing institutional measures from IPEDS with estimates from NPSAS:18-AC by sector at the national and state level (if the sector/state level response rate is sufficient), depending on the institution and student type. The reports will underscore the importance of NPSAS data and 'give back' to institutions by providing comparative data with their peers.

#### **b. NPSAS:18-AC Research and Policy Issues**

Many of the important questions that NPSAS:18-AC aims to address are the same as in the past years. Price increases, net price levels, and increases in student loan debt will continue to be central issues. The NPSAS:18-AC data will be used to address policy issues related to changes in federal financial aid programs resulting from the anticipated reauthorization of the Higher Education Act. Following are some of the primary research and policy issues to be addressed using NPSAS:18-AC data:

##### **(1) Student demographics;**

- What is the distribution of student enrollment among types of institutions by gender, race/ethnicity, age, dependency, and income?
- What types of institutions are serving the largest proportions of low-income, nontraditional, and ethnic minority students?
- What proportion of undergraduates are first-generation college students, and what types of institutions are they attending?
- What proportion of students are immigrants or children of immigrants, and what types of institutions are they attending?
- What proportion of students enrolled in postsecondary education are active military or veterans, and what types of institutions do they attend?

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<sup>1</sup> Data from the NSC, VBA, ACT, and SAT scores are pending contracts or agreements with those organizations. If NCES is unable to secure an agreement with any of these organizations, a change memo will be submitted by December 17, 2018.

(2) Academic preparation and programs;

- What proportion of college students have taken remedial courses?
- What types of students are enrolled in vocational certificate, associate's degree, and bachelor's degree programs, and what are their fields of study?

(3) Financial aid;

- What proportion of students need financial aid, and what is the average amount of need by income?
- What proportion of students has remaining need beyond what they receive in financial aid, and what is the average amount of unmet need?
- What proportion of students receive federal Pell grants, and where do they attend college?
- What proportion of students are receiving aid from states, institutions, employers, and private sources, and what is the average amount received?
- What proportion of students are receiving need-based or merit-based aid?
- How does the amount and type of aid vary by dependency and income level?
- What is the ratio of federal to nonfederal aid at various types of institutions?
- What is the ratio of grants to loans at various types of institutions?
- What proportion of students receive veterans and other Department of Defense benefits, and how much do they receive?
- How has the incidence and average amount of veterans benefits changed since the enactment of the Post-9/11 GI Bill (P.L. 110-252)?
- How has the number and proportion of nonveterans receiving veterans benefits as dependents of veterans changed since enactment of the Post-9/11 GI Bill (P.L. 110-252)?
- What types of institutions enroll the highest proportions of active-duty military personnel, veterans, and recipients of veterans benefits?

(4) Price of attendance;

- What are the differences in the average tuition and total price of attendance by type of institution and among students by dependency, income, and full-time or part-time attendance status?
- What is the average net price of attendance (student budget minus financial aid) at various income levels at different types of institutions?

(5) Student borrowing;

- What are the differences in the percentage of students borrowing and the average amounts borrowed through the federal student loan programs by institution type, attendance status, class level, and income?
- What proportion of students borrow the maximum Direct (Stafford) Loan amounts?
- What is the difference in the proportion of students receiving subsidized or unsubsidized Direct (Stafford) Loans by dependency and income level?
- What proportion of graduate students borrow and at what rate do they use Graduate PLUS loans to fund their education?

- What is the average cumulative debt of students by class level, especially among graduating college seniors?
- What is the average cumulative debt of graduate students and what portion of that debt was incurred in graduate school?
- What proportion of students borrow private loans, in what amount, and how does this borrowing vary by institution type?

As previously noted, NPSAS:18-AC uniquely allows for analysis among and between states, as well. The following represent examples of policy questions that data from NPSAS:18-AC alone can help address:

- How does student borrowing vary among states and sectors within states?
- What is the relationship between federal loans and need-based grants and their state equivalents?
- What is the relationship between state merit-aid programs and federal borrowing and Pell grants?
- What are the effects of the emerging “free” community college policies being adopted by states?
- Which states most effectively serve military veterans and how do they do so?
- What is the influence of decentralized tuition setting authority in a state?
- What are the costs associated with certain college majors that specifically address states’ workforce needs?

Answers to these and other questions are vital for policymakers at the local, state, and national levels to respond adequately to the changing environment of postsecondary education. Since inception, the NPSAS, BPS, and Baccalaureate and Beyond Longitudinal Study (B&B) series have resulted in numerous NCES publications addressing these issues. The data from these studies have also been used extensively to explore Sample Surveys division issues through the NCES Postsecondary Education Analysis Resources (PEAR) series.

### **c. Study Design for NPSAS:18-AC**

The study design for NPSAS:18-AC differs from previous NPSAS iterations in which student interviews were incorporated. In past studies, the demands of including student interviews limited the number of students included in the sample. As a result, data were useful for addressing policy questions at the national level, but limited in their applicability to state-specific issues. By foregoing the student interview, we were able to increase the NPSAS:18-AC sample size to 400,000 students. This increase will provide representative samples of undergraduate students for all 50 states, Washington D.C., and Puerto Rico, as well as representative samples of undergraduate students in 2- and 4-year public institutions within each state. The target population includes all students enrolled in a sample of institutions for the 2017–18 academic year, and a stratified sample of students within the sampled institutions will then be selected (see Supporting Statement Part B for more detail).

Given the absence of a student interview, NPSAS:18-AC will primarily rely on student data collected from postsecondary institutions themselves. As in NPSAS:16, institutions will be asked to verify institutional characteristics and provide enrollment lists for sampling purposes. Additionally, collected student records data will include levels of state and institution aid awarded, enrollment status, expected educational

expenses, degree information, and select student characteristics.

In addition to the student records data described above, NPSAS:18-AC will incorporate data obtained from a variety of supplementary administrative data sources, including queries of the Department's CPS, which houses and processes data contained in FAFSA and NSLDS, including federal loan and Pell Grant files. NPSAS:18-AC will also include data matches with NSC (which provides data about institutions attended, enrollment dates, and degree completions); the VBA (which provides detailed outlays of benefits to veterans of armed forces); and ACT and the College Board's SAT test scores – pending establishment of data use agreements with each vendor. A description of the confidentiality procedures in place for administrative record matching is provided in appendix C.

The NPSAS:18-AC data collection will overlap with the data collection period for the BPS:12 postsecondary transcript collection (OMB #1850-0631 v.10). While these are separate studies that are not collecting the same types of data (NPSAS:18-AC will collect student records data, while BPS will collect transcripts), some institutions will be sampled for both studies during the same academic year. Section B.3 provides additional information about how these studies relate in their contacting materials, study schedules, and planned use of the Postsecondary Data Portal website.

### **3. Use of Information Technology**

Enrollment lists and student record data will be provided on the Postsecondary Data Portal (PDP) website. The PDP website is used across NCES institution data collections. Section B.3 of Supporting Statement Part B includes information about how the website is used for multiple studies.

For NPSAS:18-AC, postsecondary institutions will be offered three modes for providing student record data: entering data directly using a web-based data entry interface (web mode), completing a pre-formatted Excel workbook template (Excel mode), and creating data files in comma separated value format (CSV mode). These data entry modes are also described in section B.3 of Part B.

The institution website for data collection will reside on NCES's Secure Sockets Layer (SSL)-encrypted servers. On a nightly basis, the data collection contractor will download student record data in batches to their Enhanced Security Network (ESN) via a secure web service. Once in the ESN, data will be cleaned and undergo quality analysis. SSL protocol is used to encrypt the data transmitted over the Internet, and data entry modules are password protected. Separate login credentials are created for each user at the participating institution. The forms that gather data on this website will require session cookies to run in accordance with the U.S. Department of Education's privacy policy for the use of cookies. The most recent versions of Microsoft Internet Explorer, Google Chrome, and Mozilla Firefox allow for rejecting all cookies other than those required for session tracking.

### **4. Efforts to Identify Duplication**

Efforts to identify duplication have included NCES consultations with other federal offices, such as the U.S. Department of Education's Office of Postsecondary Education; the Office of Planning, Evaluation, and Policy Development; and other agencies, such as the Government Accountability Office; the Congressional Budget Office (CBO); and the Office of Management and Budget (OMB). In addition, NCES collaborates with the National Center for Science and Engineering Statistics (NCSES) at the National Science

Foundation (NSF) to ensure that each unit is kept up to date on each other's studies pertaining to postsecondary students and institutions. NCES and NSF meet on a regular basis to cover topical issues relevant to both offices, and each has staff serving on study TRPs. NCES routinely consults with nonfederal associations, such as the American Council on Education, the Career Education Colleges and Universities, the National Association of Student Financial Aid Administrators, the National Association of Independent Colleges and Universities, the Council of Graduate Schools, the Institute for Higher Education Policy, the State Higher Education Executive Officers Association, and the National Association of State Student Grant and Aid Programs to confirm that data collected through NPSAS are not available from any other sources. NCES also consults with academic researchers, several of whom attend the NPSAS TRP meetings. Beyond identification of duplication, these consultations provide methodological insights from the results of similar and related studies conducted by NCES, other federal agencies, and nonfederal sources. The consultations also assure that data collected through NPSAS will meet the needs of the federal government and relevant organizations. No studies in the United States singularly duplicate the data produced by NPSAS.

## **5. Method Used to Minimize Burden on Small Businesses**

For-profit, private not-for-profit, and public institutions will be asked to provide student record data. As noted in section A.3 above, NPSAS:18-AC will offer a choice of three modes for submitting the requested data: web mode, Excel mode, and CSV mode. Offering multiple modes minimizes burden on institutions, which may select the most convenient and least burdensome format(s) for their staff and record-keeping systems. The data entry modes available to participating institutions are described in section B.3 of the Supporting Statement Part B.

Because NCES anticipates an increased frequency in student records collections on a 2-year rather than 4-year cycle, NCES designed the Postsecondary Data Portal website as a static collection instrument applicable to NPSAS:18-AC and other future NCES studies (including longitudinal sample surveys). NCES anticipates minimizing changes to the data collection instrument so that institutions can repeat procedures and re-use old programming code to extract data from their databases. Additionally, NCES will provide resources to reduce burden on institutions including frequently asked questions and instructional videos. Over time, through such means, NCES staff hope to mitigate the increased burden of a more frequent data collection.

## **6. Frequency of Data Collection**

Large-scale and rapid changes in federal policy concerning postsecondary student aid necessitate frequent studies that provide accurate and up-to-date information necessary for informed decision making. More federal policymaking is occurring outside the Higher Education Act renewal process through regulation, the budget appropriation process, and Reconciliation. This has resulted in more changes to the Federal Student Aid (FSA) programs compared to when the Higher Education Act was reauthorized on a set schedule. From year to year, eligibility restrictions change, the FAFSA changes (e.g., simplification and prior-prior year income), size of grant and loan amounts fluctuate, and the balance between various aid options changes dramatically. Because these changes affect students' ability to finance postsecondary education and the level of debt students accumulate, frequent data collections are necessary. Moreover, the dynamic nature of the postsecondary environment itself calls for more

frequent data collection. For example, notable closures among for-profit institutions have consequences for the postsecondary climate and student financing, as do changes in private-sector lending, increases in tuition and fees, and changes in federal student aid policies. Effects of these changes on federal policy and postsecondary education participation create an opportunity, as well as a need, for frequent monitoring on a regular basis.

Previously, NPSAS studies occurred every 3 to 4 years. The introduction of NPSAS:18-AC shortens the gap between NPSAS years generally, increasing the ability to more definitively address the impact of policy and environmental changes on student behavior. Adding NPSAS:18-AC to the NPSAS cycle also sheds light on important state-level questions prior NPSAS studies could not address. Ultimately, NPSAS:18-AC lessens the time between surveys and provides additional, previously unavailable data to researchers and policy makers.

## **7. Special Circumstances of Data Collection**

No special circumstances of data collection are anticipated.

## **8. Consultants Outside the Agency**

Recognizing the significance of NPSAS data collection, several strategies have been incorporated into the project work plan that allow for the critical review and acquisition of comments relating to project activities, interim and final products, and projected and actual outcomes. These strategies include consultations with persons and organizations both internal and external to NCES, the U.S. Department of Education, and the federal government.

Previous NPSAS implementations have benefited from a TRP composed of staff from several offices in the Department of Education; representatives of NSF, OMB, and CBO; and nonfederal members who are considered experts in postsecondary education issues, including financial aid (a list of the TRP members is provided in appendix A). A TRP meeting, which included a web conference with state-based agency representatives from across the country, was held in January 2017 to inform the NPSAS:18-AC data collection.

## **9. Provision of Payments or Gifts to Respondents**

Institutions may require reimbursement for the cost of time spent preparing and providing enrollment lists and student records. Expenses will be reimbursed to the extent that they are reasonable and properly documented.

## **10. Assurance of Confidentiality**

NCES assures participating individuals that all information collected under NPSAS:18-AC 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 primary contractor for this study is RTI International (Contract# ED-IES-13-C-0070). Confidentiality and data security protection procedures have been put in place for NPSAS:18-AC to ensure that the contractor and its subcontractors comply with all privacy requirements, including:

1. The statement of work of this contract;

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, the contractor 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/>.

The NPSAS:18-AC 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.

NPSAS:18-AC 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.

Additionally, the contractor will take security measures to protect the web data collection application from unauthorized access. The web server will include an SSL certificate and will be configured to force encrypted data transmission over the Internet. All files uploaded to the website will be stored in a secure project folder that is accessible and visible to authorized project staff only. To access restricted pages containing confidential information, website users will be required to log in by entering an assigned ID number and password. Through the website, the primary coordinators at the institution will be able to use a "Manage Users" link, available only to them, to add and delete user accounts for other staff at the same institution. The new users will be assigned a temporary password, which they will be required to change upon logging in to the website for the first time.

Security measures have been put in place to protect data during file matching

procedures described in section A.3 of this document. NCES has a secure data transfer system, which uses SSL technology, allowing the transfer of encrypted data over the Internet. The IES File Transfer System will be used for all administrative data sources that do not have their own secure file transfers systems All data transfers will be encrypted.

The Department has established a policy regarding the personnel security screening requirements for all contractor employees and their subcontractors. The contractor must comply with these personnel security screening requirements throughout the life of the contract, including several requirements that the contractor must meet for each employee working on the contract for 30 days or more. Among these requirements are that each person working on the contract must be assigned a position risk level. The risk levels are high, moderate, and low based upon the level of harm that a person in the position can cause to the Department's interests. Each person working on the contract must complete the requirements for a "Contractor Security Screening." Depending on the risk level assigned to each person's position, a follow-up background investigation by the Department will occur.

NPSAS:18-AC and other NCES postsecondary studies include data linkages with many existing sources of valuable data, including Department of Education's (ED) CPS for FAFSA data, NSLDS, and NSC. These NCES studies also obtain data from postsecondary institution student records, information on military service records from VBA, and admissions test scores from ACT and The College Board. Many of these administrative data matches are not guaranteed and will require separate Memorandums of Understanding, Agreements, or Contracts with different offices within the U.S. Department of Education.

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 NPSAS:18-AC 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--

- (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."

NPSAS:18-AC is collecting data under the Secretary's authority. Specifically, NCES, as an authorized representative of the Secretary of Education, is collecting this information for the purpose of evaluating a federally supported education program. Any personally identifiable information is collected with adherence to the security protocol detailed in 34 CFR §99.35:

"(a)(1) Authorized representatives of the officials or agencies headed by officials listed in §99.31(a)(3) may have access to education records in connection with an audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs.

(2) The State or local educational authority or agency headed by an official listed in §99.31(a)

(3) is responsible for using reasonable methods to ensure to the greatest extent practicable that any entity or individual designated as its authorized representative—

- (i) Uses personally identifiable information only to carry out an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements related to these programs;
- (ii) Protects the personally identifiable information from further disclosures or other uses, except as authorized in paragraph (b)(1) of this section; and
- (iii) Destroys the personally identifiable information in accordance with the requirements of paragraphs (b) and (c) of this section.

(b) Information that is collected under paragraph (a) of this section must—

- (1) Be protected in a manner that does not permit personal identification of individuals by anyone other than the State or local educational authority or agency headed by an official listed in §99.31(a)(3) and their authorized representatives, except that the State or local educational authority or agency headed by an official listed in §99.31(a)(3) may make further disclosures of personally identifiable information from education records on behalf of the educational agency or institution in accordance with the requirements of §99.33(b); and
- (2) Be destroyed when no longer needed for the purposes listed in paragraph (a) of this section.

(c) Paragraph (b) of this section does not apply if:

- (1) The parent or eligible student has given written consent for the disclosure under §99.30; or
- (2) The collection of personally identifiable information is specifically authorized by Federal law.”

Additionally, 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 the data collection contractor, will not include Social Security Numbers (SSNs) or other extremely sensitive Personally Identifiable Information (e.g., name, birthdate, etc.) even though these data elements 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 sampled students. 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.
- The study cannot be conducted practicably without the waiver. Data will be collected from postsecondary institutions, and there will be no direct contact with sampled students. To obtain written consent from sampled students, multiple forms would have to be sent to them with multiple follow-up telephone and in-person visits. This process would add weeks to the data collection process and is not feasible from a time standpoint. Additionally, the value of these data would be jeopardized from a nonresponse bias perspective.

## **11. Sensitive Questions**

Social Security Numbers (SSNs) will be needed to conduct file matches to administrative records. File matching to administrative records is a crucial element of NPSAS:18-AC and would not be possible without the collection of SSNs. Data obtained from file matching is integral to the study and will increase data quality.

## 12. Estimates of Response Burden

Table 1 provides the projected estimates for response burden for NPSAS:18-AC, which are based on experiences from prior rounds of NPSAS. The response time for participating institutions will vary based on how institutions keep their records and how easily they can extract the requested information. The burden calculation for NPSAS:18-AC includes four activities:

- 1) responding to eligibility-screening calls, which are made to each sampled institution to confirm eligibility and verify contact information before study information is mailed;
- 2) completing the Institution Registration Page (IRP), which collects basic information about institutional characteristics and prompts the institution to name a coordinator for the study;
- 3) providing electronic enrollment lists of all students enrolled during the academic year (institutions can choose to provide their enrollment lists by uploading a file to the secure Postsecondary Data Portal website or e-mailing an appropriately encrypted file directly to the data collection contractor. Based on NPSAS:12 and NPSAS:16 results, we expect that most NPSAS:18-AC enrollment lists will be uploaded to the project website, and very few enrollment lists will be sent via e-mail); and
- 4) providing student records data for the institution's sampled students.

The estimated burden for each of these activities is included in table 1, below. The estimates included in table 1 are based on the sample size estimates discussed in Part B of this package, and an assumption that a student records collection will only be requested from one institution per sampled student. Using time-burden data for similar institutional data collection tasks, we estimate the average burden per institution to be approximately 165 minutes for enrollment list collection and 1,332 minutes for student records collection. Using an hourly rate of \$40.55<sup>2</sup> for the institutional staff, the total estimated burden time cost to all participating institutions is approximately \$2,586,766 for the 63,792 total burden hours.

**Table 1. Average estimated burden to respondents for the NPSAS:18-AC data collection**

Data collection activity	Sample	Expected eligible	Expected response rate (percent)	Expected number of respondents*	Expected number of responses	Average time burden per response (mins)	Total time burden (hours)
<b>Institutional Collection</b>							
Eligibility-screening calls	3,126	3,095	100	3,095	3,095	5	258
Institution Registration Page	†	3,095	85	2,631	2,631	5	220
Institutional enrollment lists	†	3,095	85	2,631	2,631	165	7,236
<b>Institution Student Records</b>							
Student record collection <sup>1</sup>	2,631	2,631	96	2,526	2,526	1,332	56,078
<b>Total</b>				<b>3,095</b>	<b>10,883</b>		<b>63,792</b>

† Not applicable.

\* Unduplicated counts of respondents.

<sup>1</sup>"Sample" is the number of institutions that provided enrollment lists for student sampling.

## 13. Estimates of Cost

There are no additional costs to the respondents.

<sup>2</sup> The hourly rate (\$40.55) was obtained using the hourly mean wage of operations research analysts in the May 2016 National Occupational and Employment Wage Estimates sponsored by the Bureau of Labor Statistics (BLS). Source: BLS Occupation Employment Statistics, <http://data.bls.gov/oes/> data type: Occupation codes: Operations Research Analysts (15-2031); accessed on April 10, 2017.

## 14. Costs to Federal Government

The contract costs to the federal government for NPSAS:18-AC are provided below in table 2. Included in the cost estimates are staff time, reproduction, postage, and telephone costs associated with the management, data collection, analysis, and reporting for which clearance is requested.

**Table 2. Contract costs for NPSAS:18-AC**

Study area and task	Budgeted amount
110 Post-award conference	\$26,112
120 Schedules	27,310
130 Monthly reports	223,296
140 Integrated monitoring system	284,914
150 Technical review panels	405,332
<b>Full-scale data collection</b>	
410 Sampling	866,651
420 OMB forms clearance	121,376
421 Instrument development	245,605
422 Training	83,445
432 CPS file merge	51,872
433 NSLDS file merge	35,715
434 Other system file merge	402,018
435 Develop data collection materials	59,544
436 Weighting, imputation, and nonresponse bias analysis	220,016
437 Data disclosure	30,455
441 Enrollment list collection	963,222
442 Institution data collection	668,630
443 Institution data processing	1,276,965
<b>Reporting</b>	
511 Report prospectus	60,142
512 Draft manuscript	258,365
513 Review-quality manuscript	159,095
514 Public-ready manuscript	94,413
515 Respond to professional judgement	20,507
520 Datalab/WebVTS	132,907
530 Restricted-Use Data Files	66,238
<b>Total Contract Cost</b>	<b>\$6,784,145</b>

## 15. Reasons for Changes in Response Burden and Costs

The burden on institutions associated with this submission, when compared to the NPSAS:16 full-scale institution data collection, is higher due to the larger sample size in NPSAS:18-AC. The *overall* burden hours associated with NPSAS:18-AC are lower than NPSAS:16 due to the fact that NPSAS:18-AC does not include a student interview. In addition, costs are lower for NPSAS:18-AC than NPSAS:16 due to the exclusion of a student interview collection.

## 16. Publication Plans and Time Schedule

The operational schedule for the NPSAS:18-AC full-scale study is shown in table 3. The following reports, publications, and other public information releases are planned for NPSAS:18-AC:

- descriptive summaries of significant findings for dissemination to a broad audience;
- detailed data file documentation describing all aspects of the full-scale study design and data collection procedures;
- complete data files and documentation for research data users in the form of both a restricted-use file; QuickStats, a public-use data analysis system in which users create their own tables and charts using predefined categories from a subset of

variables; and PowerStats, a public-use data analysis system in which users create their own tables and charts using all of the variables, in addition to conducting regression analysis, and which is the basis for TrendStats that allows users to analyze data across NPSAS administrations with optional automatic inflation adjustments for dollar values (NCES may release a Public Use microdata file if it is technically feasible after disclosure review); and

- special tabulations of issues of interest to the higher education community, as determined by NCES.

**Table 3. Operational schedule for NPSAS:18-AC**

NPSAS:18-AC activity	Start date	End date
Full-scale study		
Draw institution sample	Jan. 12, 2018	May 22, 2018
Contact institutions for recruitment and enrollment lists	Mar. 1, 2018	Apr. 23, 2018
Collect enrollment lists	Apr. 23, 2018	Aug. 31, 2018
Select student sample	Apr. 23, 2018	Sep. 7, 2018
Collect student data from postsecondary institutional records	Jun. 18, 2018	Jan. 4, 2019
Process data, construct data files	Jun. 18, 2018	Aug. 2, 2019
Prepare/update reports	Dec. 17, 2018	Jan. 3, 2020

### **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 is being requested.

### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

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