

High School and Beyond 2020 (HS&B:20) Base-Year Field Test Sampling and Recruitment

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Supporting Statement Part A

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A. Justification

A.1 Circumstances Making Collection of Information Necessary

A.1.a Purpose of this Submission

The High School and Beyond 2020 study (HS&B:20) will be the sixth in a series of longitudinal studies at the high school level conducted by the National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES) of the U.S. Department of Education. HS&B:20 will follow a nationally-representative sample of ninth grade students from the start of high school in the fall of 2020 to the spring of 2024 when most will be in twelfth grade. The study sample will be freshened in 2024 to create a nationally representative sample of twelfth-graders. A high school transcript collection and additional follow-up data collections beyond high school are also planned.

This request is to conduct state, school district, school, and parent recruitment activities, beginning in January 2019, in preparation for the HS&B:20 base-year field test, scheduled to take place in the fall of 2019. The activities include collecting student rosters and selecting the base-year field test sample. Approval for the base-year field test data collection and base-year full-scale sampling and recruitment activities will be requested in a separate submission in early 2019.

Part A of this submission presents information on the basic design of HS&B:20; Part B discusses the statistical methods employed; Appendix A provides the communication materials that will be used during state, school district, school, and parent recruitment activities; and Appendix B provides the roster instrument. The primary contractor for this study is RTI International (Contract # 919900-18-R0018).

A.1.b Legislative Authorization

HS&B:20 is the next in the series of high school longitudinal studies conducted by NCES in close consultation with other U.S. Department of Education offices, other federal agencies, and organizations. NCES is authorized to conduct this study by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543).

A.1.c Prior and Related Studies

NCES's secondary longitudinal studies program has produced some of the most prominent studies of high school education in the United States. The series of studies inaugurated with the National Longitudinal Study of 1972 (NLS-72) and was followed by the High School and Beyond 1980 (HS&B:80), the National Education Longitudinal Study of 1988 (NELS:88), the Education Longitudinal Study of 2002 (ELS:2002), and the High School Longitudinal Study of 2009 (HSL:09). These studies examine high school students and their long-term trajectories. High School and Beyond 2020 (HS&B:20) continues this series of longitudinal studies.

The NCES secondary longitudinal studies examine issues such as students' readiness for high school; the risk factors associated with dropping out of high school; high school completion; the transition into postsecondary education and access/choice of institution; the shift from school to work; and the pipeline into science, technology, engineering, and mathematics (STEM). They have informed education policy by tracking long-term trends and elucidating relationships among student, family, and school characteristics and experiences. They have also helped establish new methodologies, designs, and measures that have influenced the practice of education research.

HS&B:20 will follow the Middle Grades Longitudinal Study of 2017/18 (MGLS:2017) which followed the Early Childhood Longitudinal Study, Kindergarten Cohort of 2011 (ECLS-K:2011). This allows for the study of all transitions from elementary school through high school and into higher education and/or the workforce.

Understanding what factors propel some students to successful completion of high school and entry into work or postsecondary education while leaving others behind is a critical function of high school longitudinal studies such as HS&B:20. The study will include surveys of students, parents, students' math teachers, counselors, and administrators. Students will also receive assessments in mathematics and reading, and be given a 1-minute vision test.

A.2 Purposes and Uses of Data

HS&B:20 will culminate in a general-purpose dataset of nationally representative data related to students' transitions into and out of high school; academic achievement (especially in mathematics and reading); the

influence of parents, community involvement, and the high school experience on student achievement and development; education equity; factors associated with dropping out of high school; and changes in education practices over time. The study data may answer questions on numerous key issues, some of which are summarized here:

1. Transition into high school
 - a. Adjustment to high school, fall 9th grade experiences and coursework
 - b. High school characteristics associated with continued achievement for high achievers or improvement for low achievers
2. Academic growth over time and student, family, and school correlates
3. High school experiences
 - a. Student mobility patterns and their effect on outcomes
 - b. Career and technical education opportunities
 - c. Prevalence and use of technology
 - d. Process of dropping out and student, family, and school characteristics associated with returning to school.

In addition to these questions, the National Eye Institute (NEI) and the National Institute on Deafness and Other Communication Disorders (NIDCD), both part of the U.S. National Institutes of Health (NIH), have contributed questions to HS&B:20 field test to be asked of students, parents, and teachers, about each sample student's:

- visual function and use of refractive correction (NEI questions); and
- hearing difficulty and communication disorders (including voice, speech, and language), exposures to loud noise (a preventable cause of hearing loss), and use of assistive devices, including hearing aids, cochlear implants, and personal sound amplification products (PSAPs) to improve hearing and ameliorate communication disorders (NIDCD questions).

Furthermore, NEI plans to provide the equipment, funding, and a painless, 1-2 minute protocol to capture an objective measure of the refractive characteristics of the student's eyes. This protocol involves sample students briefly holding a handheld autorefractor close to their eyes (just like viewing objects through a pair of binoculars). NIDCD, in turn, plans to provide the equipment, funding, and a protocol to capture an objective measure of student's hearing acuity in each ear across the listening frequency range from 500 through 8,000 Hertz. Recent technological developments have made it possible to examine hearing sensitivity in normal quiet rooms instead of from inside large sound-attenuating booths. Boothless audiometry systems can be self-administered using compact hand-held devices (e.g., tablet computers) under the direction of trained technicians. Audiometric thresholds can be captured painlessly using circum-aural (surrounding the ears) headphones as the student listens to pure-tone frequencies generated at varying sound levels. This exam will take 8 to 10 minutes.

Where permitted by the school, students and parents will be provided a copy of the student's eye exam and hearing test results along with an explanation of what the results mean and if any follow-up by a health care professional might be warranted. Additionally, NEI and NIDCD will make available, for interested schools' use, materials on eye health and on healthcare for hearing and other communication disorders for incorporation into health classes, a school assembly, or for general library/media center reference.

Building on NEI's and NIDCD's previous collaboration with ECLS-K:2011 and MGLS:2017, HS&B:20 data collected from 9th and 12th graders will be critically important to understanding how eyesight and/or mild and worse hearing loss and other communication disorders affect academic performance and subsequent career trajectories to the workforce, further technical training, or college education.

With regards to hearing, in several states and local communities, the prevalence of hearing impairment in children is much higher than the U.S. national average. Identification and interventions in high school should be a major benefit and boost for these students as they progress through high school and then transition into the workforce or to further educational opportunities beyond high school.

With regards to visual function, adolescence is a time when myopia (difficulty seeing distant objects or seeing them as blurry) manifests itself, and when vision (an important sense required for activities such as seeing the materials presented at the front of the classroom, participating fully in sports, walking safely to school, and learning to drive a vehicle) is essential to normal adolescent development. In many countries around the world,

the prevalence of myopia is increasing and reaching epidemic levels. There are no current nationally representative data on the prevalence of myopia among school-aged children in the U.S. An objective measurement using a hand-held device will provide myopia prevalence information, and the survey questions will inform whether and how myopia influences academic performance and subsequent trajectories to various career tracks, depending on whether a student with myopia has the refractive correction (e.g. eyeglasses or contact lenses) they would need to allow them to have normal vision. Furthermore, the combination of autorefractor measurement and survey questions will provide information on whether parents can recognize if their teenage student has difficulty seeing, if the students can recognize changes in their own vision as their bodies mature (a critical developmental time when eyes elongate and vision issues become more symptomatic), and the patterns of eyeglasses/contact lenses use among students who need them.

To address all of the issues listed in this section, data will be collected from high school students and their parents, teachers, school counselors, and school administrators.

Students will participate in the following study components:

- The **mathematics assessment** will measure students' mathematics proficiency at the start of high school.
- The **reading assessment** will provide information on the reading achievement of students in grade 9.
- The **student survey** is designed to provide information about the factors associated with student success. Topics such as student's attitudes, experiences, behaviors, and interactions will be covered to understand their influence on student performance and outcomes.
- The **hearing and vision assessments** will assess hearing and communication skills as well as visual function and use of refractive correction.

Parents will complete a survey about the student's home life and educational experiences. The math teachers of the students will complete a survey about their background, classroom practices, and support at the school. Math teachers will also be asked to provide information on each sampled student that they teach. A counselor at each school will complete a survey about counseling practices at the school. The administrator or principal at each school will complete a survey about policies and practices at the school.

A.3 Use of Information Technology

Technology will be used when feasible to reduce burden and improve efficiency and accuracy at all levels of the study. A brief study video, accessible via the Web, will be made available to help introduce the study, describe its importance, and demonstrate what participation will look like in schools. School districts and schools will be able to upload roster information and parent and teacher linkages to sampled students via the secure HS&B:20 website, but will also be able to provide this information in any format convenient for them.

A mobile computer lab will be set up for the student session at each participating school. The student session will be completed on tablet-like Chromebook computers with touchscreen capability and an attached keyboard. The computerized assessment is made possible by connecting the Chromebooks to an independent local area network (LAN) housed on a laptop computer set up at the school by study field staff. All equipment is provided by the study, and neither the school's internet access nor any internet access in general is required for the computerized administration of the student session. At schools that participate in the study but do not allow in-school data collection, students will be asked to participate in a self-administered web-based data collection outside of school. The website for data collection will reside on NCES' Secure Socket Layer (SSL) encrypted servers. 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. A computer-based data management system, designed to facilitate tracking efforts, will be used to manage the sample using encrypted data transmission and networking technology to maintain timely information on respondents, including contact, tracking, and case completion data. This system will be particularly important as students move from one school to another over the course of the study.

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 have regularly consulted 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. These consultations and the HS&B:20 Technical Review Panel (TRP) also provide methodological insights from the results of other studies of secondary and postsecondary students and labor force members, and they ensure that the data collected through HS&B:20 will meet the needs of the federal government and other interested agencies and organizations. Other longitudinal studies of secondary and postsecondary students (i.e., NLS:72, HS&B, NELS:88, ELS:2002, HSLs:09) have been conducted by NCES in the past and, in addition to providing contemporary data, HS&B:20 builds on and extends these studies rather than duplicating them.

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 National Longitudinal Survey of Youth 1979 and 1997 cohorts (NLSY79, NLSY97) conducted by the Department of Labor (Bureau of Labor Statistics). However, the NLSY youth cohorts represent temporally earlier cohorts than HS&B:20. There are also important design differences between NLSY79/ NLSY97 and HS&B:20 that render them more complementary than duplicative. NLSY is a household-based longitudinal survey, while HS&B:20 is school based. For both NLSY cohorts, Base Armed Service Vocational Aptitude Battery (ASVAB) test data are available, but there are no longitudinal high school achievement measures. Although NLSY97 also gathers information from schools (including principal and teacher reports and high school transcripts), it cannot study school processes in the same way as HS&B:20, given its household sampling basis. Any given school contains only one to a handful of 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, HS&B:20 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.

A.5 Methods Used to Minimize Burden on Small Businesses

Burden in general will be minimized wherever possible. During district and school recruitment, we will minimize burden by training recruitment staff to make their contacts as straightforward and concise as possible. The recruitment letters and materials (e.g., the study description and FAQs) are designed to be clear, brief, and informative. In addition, during data collection, contractor staff will conduct all in-school student sessions and will assist with parental notification, sampling, and other study tasks as much as possible within each school.

A.6 Frequency of Data Collection

The NCES high school longitudinal cohort studies have been conducted each decade since 1972. The most recent high school cohort, HSLs:09, consisted of fall 2009 ninth-graders – 11 years prior to the HS&B:20 ninth-grade cohort. HS&B:20 will follow a nationally-representative sample of ninth-grade students from the start of high school in the fall of 2020 to the spring of 2024 when most will be in twelfth grade. The sample will be freshened in 2024 to create a nationally representative sample of twelfth-graders. A high school transcript collection and additional data collection follow-ups beyond high school are also planned. The field test will take place one year prior to the full-scale data collection, with a data collection of students in grades 9 and 12 in the fall of 2019 and following those ninth-graders in the spring of 2023 when most will be in twelfth grade.

A.7 Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

A.8 Consultations Outside the Agency

Content experts have been consulted in the development of the assessments and questionnaires. A TRP meeting was held in August 2018 to inform the HS&B:20 base-year survey design, and the HS&B:20 mathematics content review panel will inform the mathematics assessment. The following are the members of the HS&B:20 TRP:

1. Oscar Barbarin – University of Maryland, College Park
2. Rebecca Callahan – University of Texas, Austin
3. Adam Gamoran – University of Wisconsin-Madison
4. Thomas Hoffer – National Opinion Research Center
5. Vinetta Jones – Howard University
6. Amy Langenkamp – University of Notre Dame
7. Wen-Juo Lo – University of Arkansas

8. Chandra Muller – University of Texas at Austin
9. Amaury Nora – University of Texas at San Antonio
10. Brian Rowan – University of Michigan
11. Russ Rumberger – University of California, Santa Barbara
12. Ming-Te Wang – University of Pittsburgh

A.9 Provision of Payments or Gifts to Respondents

High levels of school participation are critical to the success of each phase of the study. School administrator, mathematics teacher, guidance counselor, parent, and student data collection activities are contingent on school cooperation. NCES recognizes that the burden level of the study is one of the factors that school administrators will consider when deciding whether to participate. Given the real and perceived burden of participation, NCES will continue to use strategies that have worked successfully in other NCES studies (e.g., HSLs:09, MGLS:2017, and ECLS-K:2011), including offering both monetary and nonmonetary incentives to respondents during recruitment. Recent experience on MGLS:2017 showed that no single incentive speaks to all schools, students, parents, or school staff. A menu of options will be presented to school districts, schools, and sample members to allow each entity to determine the most effective incentive to facilitate participation in the study. Table 1 summarizes the incentive planned for each respondent type and instrument/activity along with their estimated burden times. A brief justification for each incentive amount follows Table 1.

Table 1. HS&B:20 Base-Year Field Test Instruments and Incentive Amounts

Instrument/Activity	Burden Time*	Incentives
Student return of parent consent forms (explicit consent schools only)	10 minutes	Food event at school (e.g., pizza, bagels, etc.) sponsored by the study
Student Assessments and Survey – In-school administration (Mathematics, Reading, Survey, and a Hearing and Vision assessment)	One class period (45 minutes) or 90 minutes	Approximately \$10 value options such as a gift card, admission to a school athletic or arts event, credit for the school cafeteria or store, item from the school store, donation to the school, movie ticket, portable charger, or ear buds. Certificate for 2 hours of community service from the U.S. Department of Education
Student Assessments and Survey – Out-of-school administration (Mathematics, Reading, & Survey)	90 minutes	\$10 for the assessment plus \$15 for the survey (gift card). Alternatively, the study will offer options with a value commensurate to the completion status (assessment, survey, or both) in the form of admission to a school athletic or arts event, credit for the school cafeteria or store, item from the school store, donation to the school, movie ticket, portable charger, or ear buds. Certificate for 2 hours of community service from the U.S. Department of Education
Parent Survey	15 or 30 minutes	\$5 prepaid incentive \$15 in cash (or check) upon survey completion or an equivalent option, such as admission to a school athletic or arts event, donation to the school, college prep course or related materials, movie tickets for the family, donation to a charity, community service certificate
Mathematics Teacher – Teacher Survey – Classroom Survey	15 or 8 minutes 5 minutes	\$20 or another option such as classroom supplies with equivalent value. Continuing education credits*
Mathematics Teacher – Teacher Student Report	5 or 2 minutes per student	\$7 per student or another option such as classroom supplies with a value commensurate to the completion status (number of study reports)
School Counselor	30 minutes	Continuing education credits*
School Administrator	40 minutes	Continuing education credits*

Instrument/Activity	Burden Time*	Incentives
School Participation	6 hours to provide roster from administrative records	\$200 or other options with equivalent value for the school, such as school supplies, materials for the school library, registration for a conference, continuing education credit for staff*, data training or related data support, etc. \$150 for school coordinator
School Coordinator (logistics, on-site visit, consent forms, administrative records, etc.)	2 hours to schedule and assist with assessments	
	6 hours for consent assistance	
	2 hours to coordinate session logistics	

*The mechanism for providing continuing education credits varies by state. NCES is exploring ways to provide continuing education credits to participating school staff in each state.

Students

During school recruitment, HS&B:20 staff will discuss with the school which of the following incentives can be offered to students to encourage their participation: a gift card, admission to a school athletic or arts event, credit for the school cafeteria or store, item from the school store, donation to the school, movie ticket, portable charger, or ear buds. Schools are varied in what they may permit for the student incentive. For example, some recommend a monetary or gift card incentive to secure cooperation from students, while others do not allow monetary or gift card incentives. Some schools may be more likely to participate if we offer items that directly benefit the school (e.g., admission to a school event, credit to the school cafeteria or store, or school donation). This will be negotiated with the school at the time of recruitment and only the options the school approves will be offered to students. Each option will have an approximate value of \$10.

Students will participate in a 90 minutes long or a one class period session (e.g., 45 minutes long) in their school (depending into which experimental treatment their school is selected). This session will include the hearing and vision assessments. At the start of the session, if permitted by the school, students will be offered a breakfast bar to ensure that they are not going into the session hungry. Upon completion of the session, students will be offered to select one from all of the incentives listed above (excluding any options not approved by their school). In addition, students will receive a certificate for 2 hours of community service from the U.S. Department of Education. For students at schools where explicit parental permission is required (i.e., return of parental consent form), students who return the form by a set date will be offered a food event sponsored by the study (e.g., pizza, bagels, etc.).

To increase response rates, schools that cannot permit an in-school session will be offered the option of providing student roster information and having the students participate outside of school. As was done in HSLs:09, to encourage participation in the study on their own time, students participating outside of school will be offered the option of a gift card for \$10 for completing the assessment plus \$15 for completing the survey, or an option with a value commensurate to the completion status (assessment, survey, or both) in the form of admission to a school athletic or arts event, credit for the school cafeteria or store, item from the school store, donation to the school, movie ticket, portable charger, or ear buds in addition to the 2-hour community service certificate. Students participating outside of school will not participate in the hearing and vision assessments.

Parents

Parent survey response rates have declined over the past decade. The ECLS-K:2011 baseline (fall 2010) parent survey response rate was more than 10 percentage points lower (74 percent)¹ than the parent survey response rate in the corresponding 1998 wave of the ECLS-K (85 percent).² The ninth-grade parent survey response rate for the HSLs:09 baseline was even lower (68 percent).³

¹ Tourangeau, K., Nord, C., Lê, T., Sorongon, A.G., Hagedorn, M.C., Daly, P., and Najarian, M. (2012). *Early Childhood Longitudinal Study, Kindergarten Class of 2010-11 (ECLS-K:2011), User's Manual for the ECLS-K:2011 Kindergarten Data File and Electronic Codebook* (NCES 2013-061). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

² Tourangeau, K., Nord, C., Lê, T., Sorongon, A.G., Hagedorn, M.C., Daly, P., and Najarian, M. (2001). *Early Childhood Longitudinal Study, Kindergarten Class of 1998-99 (ECLS-K), User's Manual for the ECLS-K Base Year Public-Use Data Files and Electronic Codebook* (NCES 2001-029). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

³ Ingels, S.J., Pratt, D.J., Herget, D.R., Burns, L.J., Dever, J.A., Ottem, R., Rogers, J.E., Jin, Y., and Leinwand, S. (2011). *High School Longitudinal Study of 2009 (HSLs:09). Base Year Data File Documentation* (NCES 2011-328). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

To examine whether the estimated parent survey length provided in study materials may have an impact on response rates, parents will be randomly assigned to complete either a 30-minute survey or a 15-minute survey. So as not to confound the results with this test, a single incentive treatment is planned for all parents. Given that an incentive experiment of parents for MGLS:2017 found that \$20 was more effective than \$0 or \$40 at gaining cooperation from parents, we will offer a total of \$20 incentive to parents of HS&B:20 sample students to encourage their participation (\$5 prepaid and \$15 postpaid). For the \$15 postpaid, we will give parents the option to receive a \$15 in cash (or check) or another option of approximately a \$15 value, such as admission to a school athletic or arts event, donation to the school, college prep course or related materials, movie tickets for the family, donation to a charity, or a community service certificate.

Teachers

Teachers will be asked to complete a survey consisting of three components. To examine whether the estimated length of the teacher survey has an impact on teacher participation, mathematics teachers will be offered either the full survey or an abbreviated survey. The teacher component of the survey will ask about the teacher's background and teaching practices and will take either 8 (abbreviated) or 15 (full) minutes; the classroom component will take about 5 minutes per classroom and will ask about the specific classes from which the sampled students are enrolled; and the teacher student report (TSR) component will take either 2 (abbreviated) or 5 (full) minutes per student and will ask questions specific to each student taught by the teacher.

Participating teachers will be offered a \$20 incentive for completing the teacher and classroom components of the survey. Because there is an added burden associated with gathering information about each student and because the number of students each teacher will be asked to report on may vary widely, teachers will be offered an additional \$7 per TSR. Teachers will have the option of receiving a check or classroom supplies with a value commensurate to the completed components. These amounts are consistent with the incentives used in other recent NCES studies, such as the MGLS:2017 and the ECLS-K:2011. In addition to the incentive above, NCES is exploring the possibility of offering continuing education credits to participating teachers, similarly to those offered by NAEP.

School Counselors and School Administrators

NCES is exploring the possibility of offering continuing education credits to participating school counselors and school administrators.

Schools

School recruitment is increasingly challenging. Schools, and districts on behalf of schools, often cite burden on students and school staff, lack of direct benefit, over-testing, and loss of instructional time as reasons not to participate in voluntary studies. Given these concerns, schools will be offered \$200 in the form of either a check or school supplies to encourage their participation in HS&B:20. In addition, we will test different student session length options (45 or 90 minutes) to determine the impact of student session length on school participation.

School Coordinators

School coordinators will be offered a \$150 monetary incentive, as has been done in studies such as MGLS:2017 and HSLs:09. They play an especially important role in the study and are critical to its success. The coordinator in each participating school will spend a total of about 16 hours to coordinate logistics with RTI (~2 hrs.); compile and supply a roster of eligible students for sampling from administrative records (~6 hrs.); communicate with teachers, students, and parents about the study to encourage their participation and distribute and collect parental consent forms (~6 hrs.); and assist the session facilitator in ensuring that the sampled students attend the testing sessions (~2 hrs.). School coordinators will receive \$50 upon receipt of the student roster and the remaining \$100 after all data collection activities have been completed at the school. We designed this split in the incentive because of the high burden associated with the roster collection.

A.10 Assurance of Confidentiality

Confidentiality and data security protection procedures have been put in place for HS&B:20 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/>.

By law (20 U.S.C. §9573), a violation of the confidentiality restrictions is a felony, punishable by imprisonment of up to 5 years and/or a fine of up to \$250,000. The HS&B:20 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. HS&B:20 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. A number of security procedures are in place for users to access restricted pages containing confidential information:

1. When a primary coordinator is assigned to the study, the assignment comes from the Chief Administrative Officer (or his or her agent). Once assigned, HS&B:20 staff will confirm the primary coordinator’s employment status through a web search, a public directory, and/or contacting the Human Resources at the institution.
2. After user’s identity is verified, website users will be required to log in by entering an assigned ID number and password, and using two-factor authentication.
3. 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.
4. HS&B:20 staff will verify the employment status of any new user assigned by the primary coordinator prior to creating the new account and allowing access using two-factor authentication.

NCES has a secure data transfer system, which uses SSL technology, allowing the transfer of encrypted data over the Internet. The NCES secure server will be used for all administrative data sources. 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.

NCES assures schools and individuals participating in HS&B:20 that all of the data provided by schools, staff, parents, and students 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 laws pertaining to the collection and use of personally identifiable information will be clearly communicated in correspondence with states, districts, schools, teachers, students, and parents. Letters and informational materials will be sent to parents and school administrators describing the study, its voluntary nature, and the extent to which respondents and their responses will be kept confidential. This information will also be included in any research applications required by school districts. A list of ninth-grade students will be requested from school districts and/or schools under the FERPA exception to the general consent requirement that permits disclosures to authorized representatives of the Secretary for the purpose of evaluating Federally supported education programs (34 CFR §§ 99.31(a)(3)(iii) and 99.35). This information will be securely destroyed when no longer needed for the purposes specified in 34 CFR §99.35.

The following language will be included, as appropriate, in respondent contact materials and on data collection instruments:

NCES is authorized to conduct the High School and Beyond 2020 (HS&B:20) by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543) and to collect students' education records from education agencies or institutions for the purposes of evaluating federally supported education programs under the Family Educational Rights and Privacy Act (FERPA, 34 CFR §§ 99.31(a)(3)(iii) and 99.35). The data are being collected for NCES by RTI International, a U.S.-based nonprofit research organization. All of the information [*respondent type*] 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 collected information will be combined across respondents to produce statistical reports.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this voluntary information collection is 1850-XXXX. Approval expires XX/XX/20XX. The time required to complete this information collection is estimated to average approximately [x] minutes per response, including the time to review instructions, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this information collection, or any comments or concerns regarding the status of your individual submission, please write directly to: The High School and Beyond 2020 (HS&B:20), National Center for Education Statistics, PCP, 550 12th St., SW, 4th floor, Washington, DC 20202.

FERPA (34 CFR Part 99) allows the disclosure of personally identifiable information from students' education records without prior consent for the purposes of HS&B:20 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.*

HS&B:20 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 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. Data will undergo disclosure avoidance analysis and disclosure treatment steps to further reduce the risk.
- The waiver will not affect the rights and welfare of the subjects. The voluntary nature of the study is emphasized to sample members. Public-use and restricted-use data are only used for research purposes and lack direct individually-identifying information. The data are further protected through disclosure avoidance procedures approved by the NCES Disclosure Review Board.
- Whenever appropriate, subjects will be provided with additional pertinent information after they have participated. For each round of the study, information about prior rounds and the nature of the study is made available to sample members.
- The study cannot be conducted practicably without the waiver. To obtain written consent from sample members, multiple forms would have to be sent to the sample members with multiple follow-up telephone and in-person visits. This process would add weeks to the data collection process and is not feasible from a time and imposed participant burden standpoint. Additionally, the value of these data would be jeopardized from a nonresponse bias perspective.
- The potential knowledge from the study is important enough to justify the waiver. HS&B:20 will provide invaluable data to researchers and education policy makers about the progress and experiences of high school students, their transitions to postsecondary education and work, their family and school environments, and their high-school and post-high-school outcomes.

A.11 Sensitive Questions

HS&B:20 is a voluntary study in which no person is required to respond, and respondents may decline to answer any item. The voluntary nature of the study is addressed in all contact materials and in the training of all project staff, field staff, and telephone interviewers. Some topics may be deemed sensitive for some respondents.

Schools. Schools (or school districts on behalf of schools) will be asked to provide rosters of all students in

grades 9 and 12 for the HS&B:20 field test. Schools may have concerns about providing this information without first obtaining permission from the parents to do so. The disclosure is permitted under FERPA's exception to the general consent requirement that permits disclosures to authorized representatives of the Secretary for purposes of evaluating Federally supported education programs (34 CFR §§ 99.31(a)(3)(iii) and 99.35). This information will be securely destroyed when no longer needed for the purposes specified in 34 CFR §99.35. All district and school personnel facilitating the conduct of HS&B:20 and the developing of the student sampling frame will be informed of the privacy and confidentiality protocols required for HS&B:20, including those having to do with the sample lists of schools and students. The collection of these data is necessary for developing the student sample.

School Administrator and Guidance Counselor. The items in the School Administrator Questionnaire and the Counselor Questionnaire are not of a sensitive nature and should not pose sensitivity concerns to respondents.

Math Teacher. The information collected in the teacher student report could be regarded as sensitive because the teacher is asked to provide information about a student's academic skills, classroom behavior, and peer relationships.

Parent. To achieve the study's primary goal of describing the development, academic outcomes, and characteristics of ninth-grade students, we will be asking parents some questions that could be viewed as sensitive in nature by some respondents. The parent survey includes questions about parental employment and unemployment, level of education, family income, student's receipt of free or reduced priced meals, how much the parent has saved for their teenager's education after high school, how often there is an adult at home when the student comes home from school, whether there is a parent living outside the home and his/her involvement with the ninth-grade student's education, whether the student or any of his/her siblings has ever dropped out of school, behavior problems and disciplinary actions received by the student, neighborhood safety, the student's disabilities, and experiences with peer victimization, contact information including social security numbers for the parent and his/her teenager. These types of questions have been asked in many large-scale studies of school-age children including the ELS:2002, HSLs:09, and MGLs:17. They provide important information about the student's home life and educational experiences that may affect long-term outcomes. The contact information is necessary to allow the sample members to be located for future follow-up. Respondents are informed that they may choose not to answer any question they prefer to skip. During this field test, data will not be collected from 12th grade parents.

Student. In the Base-Year field test, students in grades 9 and 12 will complete a questionnaire which includes a few questions that could be sensitive for some students, such as questions about internalizing attitudes or behaviors, repeating grades in school, and school and class attendance, negative behaviors of their peers, victimization by their peers both at school and online, about how often parents monitor their behavior, and to self-report their race/ethnicity and sex, which could be sensitive questions for students at this age. Students are also asked for contact information so that they may be located in the future for follow-ups. The questions that are included in the student survey have been asked in other studies of adolescents and the responses to these questions have been found to help explain why some students are more likely to continue their education after high school, attain higher educational credentials, and have better employment outcomes. Students participating in school will also be asked to answer questions about their hearing and vision and take brief hearing and vision assessments. Respondents are informed that they may choose not to answer any question they prefer to skip.

A.12 Estimates of Response Burden

Burden estimates for all activities associated with Base-Year field test recruitment activities are shown in Table 2. Because of the limited time to recruit schools for the field test and the need for a sufficient school sample size to provide power for the experiments, we are releasing a large school sample to achieve the desired yield, which results in a low expected school district and school response rate. The total burden time for participating school districts, estimated at 260 minutes, includes time to have discussions internal to the district and possibly the school board about district participation, as well as conversations with RTI recruitment staff and completing the nondisclosure affidavit. The total response burden estimate for district IRB approvals (in the special handling districts that require completion of a research application before they will allow schools under their jurisdiction to participate in a study) is based on an estimated 120 minutes for IRB staff review and approval and 120 minutes per panelist for approval by the district's IRB panel, which is estimated to average 5 panelists. The total burden time for participating schools, estimated at 260 minutes, includes time to discuss participation with the RTI recruiter, with staff internally, and with the school district as well as to appoint a coordinator and assist the

school coordinator with data collection preparations. The school coordinator total burden time is estimated at 16 hours and includes an estimate 6 hours to prepare the student roster and an estimate 10 hours to coordinate the logistics and distribute and track parent permission forms. About 35 students per grade, in grades 9 and 12, will be randomly selected for participation from the school-provided roster. Parents of sampled students are estimated to spend about 10 minutes to read the study materials that will be provided and, if appropriate, sign the permission form either in hard copy or electronically.

Table 2. HS&B:20 Base-Year Field Test Recruitment Burden Estimates¹

HS&B:20 Activity	Sample Size	Expected Response Rate	Number of Respondents	Number of Responses	Average Burden Time (minutes)	Total Burden (hours)	Estimated Respondent Average Hourly Wage ¹	Estimated Respondent Burden Time Cost
Base-Year Field Test (BYFT) Recruitment								
Nonparticipating districts	154	70.00%	108	108	20	36	\$46.85	\$1,687
Participating districts		30.00%	46	46	260	200	\$46.85	\$9,370
District IRB staff study approval	16	100.00%	16	16	120	32	\$46.85	\$1,500
District IRB panel study approval	80 ²	100.00%	80	80	120	160	\$46.85	\$7,496
Nonparticipating eligible schools	309	75.75%	234	234	20	78	\$46.85	\$3,655
Participating schools (90 minutes)		9.75%	30	30	260 ³	130	\$46.85	\$6,091
Participating schools (45 minutes)		13.00%	40	40	260 ³	174	\$46.85	\$8,152
Participating schools (out of school only)		1.50%	5	5	260 ³	22	\$46.85	\$1,031
School Coordinators (assistance) ⁴	75	100%	75	75	600	750	\$30.22	\$22,665
School Coordinators (roster data)		100%	75 ⁵	75	360	450	\$30.22	\$13,599
Students' parents (9 th grade permission)	2,625	80.75%	2,120	2,120	10	354	\$24.34	\$8,617
Students' parents (12 th grade permission)	2,485	80.75%	2,007	2,007	10	335	\$24.34	\$8,154
Total	-	-	4,761	4,836	-	2,721	-	\$92,017

¹ The average hourly earnings of parents derived from May 2017 Bureau of Labor Statistics (BLS) Occupation Employment Statistics is \$24.34, of high school teachers is \$30.22, of education administrators is \$46.85, and of educational guidance counselors is \$28.18. If mean hourly wage was not provided, it was computed assuming 2,080 hours per year. The exception is the student wage, which is based on the federal minimum wage. Source: BLS Occupation Employment Statistics, <http://data.bls.gov/oes/>; datatype: Occupation codes: All employees (00-0000); High school teachers (25-2031); Education Administrators (11-9032); and Educational guidance counselors (21-1012); accessed on July 30, 2018.

² Assumes five individuals per panel.

³ Assumes the same school burden time to review study request, decide whether or not to participate, appoint a coordinator, and assist with the preparations for data collection regardless of the student session length or location.

⁴ Assumes 10 hours to distribute and collect parental permission forms, and to schedule and coordinate data collection logistics.

⁵ A duplicate count of respondents, not included in the Total Number of Respondents.

A.13 Estimates of Total Annual Cost Burden

There are no costs to respondents other than the cost associated with response time burden.

A.14 Costs to Federal Government

A summary of estimated costs to the federal government for HS&B:20 are shown in Table 3, with detailed breakdown of contract costs provided in Table 4. Cost estimates include staff time, shipments, reproduction, postage, and telephone costs associated with the study management, data collection, analysis, and reporting. The costs shown are for the base-year field test and full-scale data collections. The total cost for the HS&B:20 base-year field test is \$7,533,737.

Table 3. Costs to NCES for the HS&B:20 base-year field test and full-scale

Base-Year Field Test (BYFT)	
NCES salaries and expenses	\$150,000
Contract costs	\$7,383,737
Total	\$7,533,737
Base-Year Full-Scale (BYFS)	
NCES salaries and expenses	\$187,500
Contract costs	\$13,798,927
Total	\$13,986,427

Table 4. Contract Costs for the HS&B:20- base-year field test and full-scale

Activity	Cost
Initial Meeting	\$ 5,916.00
Schedules	\$ 592,964.00
TRP	\$ 255,621.00
Study Monitoring	\$ 346,379.00
Data Security	\$ 231,094.00
Mathematics Assessment	\$ 1,119,180.00
Base-Year Field Test	
Sampling	\$ 95,087.00
Instrument development	\$ 1,897,147.00
OMB forms clearance	\$ 70,156.00
Recruitment	\$ 522,875.00
Training	\$ 504,871.00
Data Collection	\$ 1,961,592.00
Data File Preparation	\$ 264,500.00
Field test reporting	\$ 791,932.00
Base-Year Main Study	
Sampling	\$ 380,108.00
Instrument development	\$ 289,499.00
OMB forms clearance	\$ 51,060.00
Recruitment	\$ 1,907,108.00
Training	\$ 1,812,869.00
Data Collection	\$ 6,302,623.00
Data File Preparation	\$ 826,152.00
Reporting	\$ 616,176.00
Weighting, imputation, and nonresponse bias analysis	\$ 208,500.00
Data disclosure	\$ 129,255.00

A.15 Reasons for Program Changes or Adjustments

This is a new study and, as such, constitutes a burden increase.

A.16 Publication Plans and Time Schedule

The operational schedule for the HS&B:20 field test and full-scale study is shown in Table 5. The contract for HS&B:20 requires multiple reports, publications, and other public information releases. Results of the field test will be published as a report and appended to the full-scale data file documentation. In addition, the following will be produced from the full-scale data:

- Descriptive summaries of significant findings for dissemination to a broad audience (including First Look reports);
- Detailed data file documentation describing all aspects of the full-scale study design and data collection procedures, including an appendix summarizing the methodological findings from the field test;
- A comprehensive psychometric report describing the development and implementation of the assessments; and
- Complete data files and documentation for research data users in the form of both a restricted-use data (RUD) file and public-use file; QuickStats – a public-use data analysis system in which users

create their own tables and charts using pre-defined categories from a subset of variables; and PowerStats, which allows users to create their own tables and charts using all of the variables, in addition to conducting regression analyses.

Table 5. Operational schedule for HS&B:20 base-year study

Activity	Start date	End date
Base-year field test		
Select school sample	August 2018	November 2019
Recruitment of schools and districts	January 2019	November 2019
Recruitment of students and parents through requesting parent consent	August 2019	February 2020
Data collection	August 2019	February 2020
Prepare field test report	March 2020	September 2020
Base-year full-scale study		
Select school sample	January 2019	May 2019
Recruitment of schools and districts	August 2019	November 2020
Recruitment of students and parents through requesting parent consent	August 2020	February 2021
Data collection	August 2020	February 2021
Process data, construct data files	September 2020	February 2022
Prepare/update reports	February 2021	February 2022

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 is being requested.

A.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.