

# PHASE II OF THE NATIONAL LONGITUDINAL TRANSITION STUDY 2012 (NLTS 2012)

Supporting Statement Part A  
OMB # 1850-0882

Submitted by  
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## INTRODUCTION

The U.S. Department of Education (ED) is requesting that the Office of Management and Budget (OMB) extend the period for an already-approved information collection (#1850-0882, NOA Date 05/31/2016) for Phase II of the National Longitudinal Transition Study 2012 (NLTS 2012). This extension improves the cost-efficiency of the approved collection of the last-school attended and second round of school district transcripts because postponing these will allow virtually all of the NLTS 2012 sample members to have completed or left high school and therefore to have complete transcripts.

This current Information Collection Request (ICR) is the same as the previously submitted ICR, with the exception of the timing of some collections having been updated to reflect the need for an extension. We have also incorporated a previously approved change by updating the description of the consent and last school attended collection activity to reflect results from the experiment conducted.

NLTS 2012 is a key component of the Congressionally-mandated National Assessment of the Individuals with Disabilities Act (IDEA 2004). Phase II entails collection of high school and post-high school administrative data, and linking these data to survey information from Phase I. NLTS 2012 is the third in a series of studies conducted by the U.S. Department of Education (ED), with the goal of describing the characteristics, secondary school experiences, transition, and outcomes of youth who receive special education services under IDEA. The current study is unique in that it includes representative samples not only of youth who had an individualized education plan (IEP) at the time of their participation in NLTS 2012, but also of youth who do not have an IEP but who have a condition that qualifies them for accommodation under Section 504 of the Vocational Rehabilitation Act of 1973, and of youth who have no identified disability.

The NLTS 2012 sample includes 21,959 students ranging in age from 13 to 21 in December 2011. The sample was selected to include sufficient students in each of the 12 federally defined disability categories, and adequate number of students without disabilities, including both students with a Section 504 plan and students with neither an IEP nor a Section 504 plan.

To meet the study's objective, Phase II administrative data will be collected from the following sources: (1) school district records, including transcripts; (2) postsecondary enrollment information through the National Student Clearinghouse (NSC), (3) student financial aid data from ED's Federal Student Aid Office (FSA), (4) employment, earnings, and benefits data from the Social Security Administration (SSA), either directly from SSA or from the Census Bureau through a joint agreement between the three agencies; and (5) information about vocational rehabilitative services and supports from the Rehabilitative Services Administration (RSA). It is our intent to obtain as much of these administrative data as possible for sample members of not only NLTS 2012, but also the NLTS 2 that was conducted by ED in the early 2000s to allow for comparisons over time of outcomes.

These data sources will yield information in three broad areas important to understanding outcomes for youth with disabilities: (1) high school course-taking and outcomes, (2) post-secondary education and

training outcomes, and (3) employment and earnings outcomes after high school. This information will be used to address three research questions:

- To what extent do youth with disabilities who receive special education services under IDEA make progress through high school compared with other youth, including those identified for services under Section 504 of the Rehabilitation Act? For students with disabilities, has high school course taking and completion rates changed over the past few decades?
- Are youth with disabilities achieving the post-high school outcomes envisioned by IDEA, and how do their college, training, and employment rates compare with those of other youth?
- How do these high school and postsecondary experiences and outcomes vary by student characteristics, including their disability category, age, sex, race/ethnicity, English Learner status, income status, and type of high school attended (including regular public school, charter school, career/technical school, special education school, or other State or Federally-operated institution)?

Two important types of products will result from NLTS 2012 Phase II, once the data are assembled. There will be a series of descriptive reports examining the trajectories of students. In addition, there will be a restricted use file that meets federal privacy and confidentiality standards but that can be used by external researchers to answer questions or explore topics beyond those planned by NLTS 2012.

## **A. JUSTIFICATION**

### **1. Circumstances Necessitating Collection of Information**

More than 2.7 million youth with disabilities between the ages of 13 and 21 receive special education services funded under Part B of the Individuals with Disabilities Education Act (IDEA). In addition to the challenges all youth encounter as they leave high school, this group frequently faces barriers related to health, social isolation, service needs, and access to supports that affect their ability to successfully transition to postsecondary education and employment.

The current authorization of IDEA was signed into law (P.L. 108-446) on December 3, 2004, to provide resources to support educational services for students with disabilities. Even before that, the 2001 No Child Left Behind Act (NCLB) was intended to improve the education of disadvantaged students, including those with disabilities, by holding districts accountable for their academic proficiency. The 2004 amendments to IDEA continued the emphasis on access to the general curriculum and accountability standards for students with disabilities. The IDEA amendments were part of a broader disability policy reform effort to support independent living and employment, reflecting the intent of the 1990 Americans with Disabilities Act, including implementation of the 1999 Ticket to Work and Work Incentives Improvement Act and new disability provisions in the Workforce Investment Act. These important statutes, together, placed increased emphasis on helping students with disabilities to succeed academically and to prepare for postsecondary education and employment.

Understanding whether these policies are achieving these objectives is important. Under Section 664(e) and (a) of IDEA 2004, ED is required to conduct studies and evaluations of transitional services and results, including postsecondary placement and employment, for individuals with disabilities identified for services under IDEA and to report to Congress (see Attachments A and B).

NLTS 2012 Phase II will address congressional intent by providing information related to high school and post-high school outcomes and will, for the first time, allow direct comparisons between students with disabilities and their peers. The comparisons provide key context for understanding how students with an IEP are faring and help to pinpoint areas of greatest challenge. Also for the first time, this NLTS will rely solely on administrative records for outcomes collection, rather than primarily on surveys. This shift in data collection approach stems from the difficulty in obtaining adequate response rates to surveys (experienced in both the current and previous NLTS studies), the lower burden and cost from this type of approach, and the higher reliability of results. Multiple waves of records collection will ensure that key outcomes are available for the youngest students in the sample and allow for assessment of both early and later post-high school experiences for some youth. The study will enable federal and state policymakers to gauge progress in meeting the goals of IDEA and NCLB. It also will help them understand the needs of transition-age youth with disabilities and may inform program development efforts. It may also be useful to special-education service providers assisting out-of-school youth with disabilities, as well as youth and their parents.

## **2. How, by Whom, and for What Purpose the Information Is to Be Used**

RTI International (RTI) will collect data for this study. RTI has had experience collecting similar information for ED's other high school longitudinal studies (e.g., HSLS:2009, ELS:2002) and will compile Phase II data from all sources, including survey data from Phase I of the NLTS 2012, to meet the objectives of this study, and produce a restricted-use file that will be available to the public.

The contractor will produce four reports. The first will describe high school course-taking patterns, high school completion status, and enrollment and persistence in postsecondary education programs. The second report will examine employment and earnings outcomes and the extent to which youth receive vocational rehabilitative services. Two short reports will update the information in the earlier reports, based on second round collection of records.

### **a. How information will be collected**

Data will be requested from multiple sources: transcripts and student records data from school districts; National Student Clearinghouse (NSC); Federal Student Aid (FSA); the Rehabilitative Services Administration (RSA); and Social Security Administration (SSA) data, obtained either from SSA directly, or through an inter-agency agreement with the Census Bureau. These sources are described below and summarized in table A.1.

Data from school districts, the NSC, and FSA – all of which are educational records -- will be collected under the requirements of the Federal Education Rights and Privacy Act (FERPA) (34 CFR Part 99), which allows for the disclosure of student information without prior consent 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.”

This data is collected under the Secretary’s authority, and NCEE is an authorized representative of the Secretary of Education. 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.”



While these provisions of FERPA allow for the release of transcript and administrative data without consent, explicit consent may be required for the extraction of SSA data. As noted in Table A.1, explicit consent to collect SSA records data was obtained for 3,499 sample members during the Phase I collection. This ICR includes a request to implement an “Increased Consent” experiment to assess strategies for increasing the consented sample for SSA matching and transcript collection. If successful, the procedures tested in the experiment will be applied to the remaining sample. These procedures are described below and in Part B of this submission.

**Records data from School Districts.** Records for youth sampled for the NLTS 2012 will be requested from school districts. Data collection will begin with mailing a packet to each district that announces the upcoming data collection and requests their participation. The packet will also include a study brochure, a FERPA Fact Sheet, a data element list, a flyer with instructions for providing data, and a letter of support from the Office of Special Education and Rehabilitation Services. These materials are included in Attachment C.

The data requested will include course-taking, attendance, and assessment data, such as courses, credits, grades, statewide 8<sup>th</sup> grade and high school state assessment scores, dates of enrollment, attendance, suspensions, expulsions, whether a youth completed high school, and, if so, the type of credential earned. We anticipate that much of this data will be available on transcripts; therefore we will request copies of sample members’ transcripts. Districts will be able to upload their transcripts directly to the secure site. Additional data not available on transcripts will be collected in data file spreadsheet templates, which districts can download from the secure site, complete offline, and then upload to the site. A list of data elements requested is included in Attachment C.

Because some sample members will still be enrolled in high school at the time of the district records collection, the study includes an optional second round of record collection, to occur in 2019. We have estimated that approximately half of the Phase II sample will be included in the second round collection.

**National Student Clearinghouse.** For youth in the NLTS 2012 sample, data on postsecondary institutions attended, enrollment dates, and degree completions will be obtained from the National Student Clearinghouse. The data collection contractor will first set up an account with the Clearinghouse which will enable sending and receiving of files securely over encrypted FTPS connections. The file containing sensitive student identifiers that are disclosable as directory information under the Family Educational Rights and Privacy Act (FERPA) (name, date of birth, and location) will be encrypted using FIPS 140-2 validated encryption tools then submitted to the Clearinghouse using their secure FTP site. All files received by the Clearinghouse will be securely stored using FIPS 140-2 validated AES encryption, the US federal encryption standard. Matched files, containing data on enrollment dates, institution names, and degrees completed, will be returned to the data collection contractor using the same secure FTP site.

**Federal Student Aid.** Because FSA records are housed within ED, secure data transfer systems already established within the agency will be used to obtain the necessary information. The name, date of birth, and location of the NLTS 2012 sample of youth will be matched with FSA’s FAFSA tables, which are already set up for matching by these directory identifiers. Through this process FSA will append the Social Security Numbers (SSNs) of students in the sample for matching with its National Student Loan Data Systems. The extracted files will then be uploaded to the secure data transfer site for retrieval by the NLTS 2012 Phase II contractor.

**Rehabilitative Services Administration.** RSA data are housed within both ED and SSA, but can only be accessed through SSA when SSNs are not available. Using a procedure similar to that used to obtain SSA data, the NLTS 2012 sample of youth will be matched by name, date of birth, and location with RSA files using SSA's NUMIDENT file. File extractions will be done using RSA's Vocational Rehabilitation participation records from RSA 911 files. The extracted files will then be uploaded to the secure data transfer site for retrieval by the NLTS 2012 contractor.

**Social Security Administration.** NLTS 2012 Phase II aims to collect data held by the Social Security Administration (SSA) to gain employment and earnings outcomes for sampled students. Because Social Security Numbers (SSN) were not collected as part of the NLTS 2012, this study will pilot test the use of either the Census Bureau's VERIDENT or SSA's NUMIDENT file to match sample members by using directory information (e.g., name, date of birth, and location) as a conduit to SSNs on the agency's internal files so that data originating at SSA can be extracted and/or tabulated. The NUMIDENT file is SSA's primary identification record and contains information such as first and last name, the SSN, and other identifying data. The Census Bureau's VERIDENT matching process works in much the same way, and most (if not all) of the data being sought for NLTS 2012 Phase II already resides at the Census Bureau so that it can be linked to other data (e.g., the Current Population Survey).

We expect this procedure of using name, date of birth, and location to obtain SSNs to be successful based on its prior use by Census Bureau. Relying solely on name, address, and date of birth, it was found that 89 percent of all adults had verified SSNs that could be used for matching with Current Population Survey files.<sup>1</sup> If the pilot matching procedure is successful, either Census or SSA will extract information related to earnings from SSA's Detailed Earning Record File and Supplemental Security Income (SSI) and Disability Insurance (DI) information from SSA's Disability Analysis File.

How the data will be provided to ED and its contractor will depend on the release restrictions for each SSA data file and Census Bureau restrictions, if the data are obtained through them. Some data will be aggregated by sample characteristics, while other data will be provided at the case level. For example, the extracted information from the Disability Analysis File will be uploaded to a secure internet site and be available at the student level. However, to protect privacy, SSA and the Census Bureau do not release employment and earnings data for individuals from their Detailed Earnings Record File. Instead, they provide aggregate information for groups. Whichever agency handles the matching will be asked to tabulate employment and earnings outcomes for NLTS 2012 youth that have been matched using the identifying information and computer code we provide. Using the matched NLTS 2012 file, the agency will extract employment and earnings data, run the provided computer programs, verify that output complies with regulations related to the privacy of the data, and provide the output to the NLTS 2012 contractor.

**Increased Consent and Last School Attended.** In an effort to increase the number of sample members available for matching to SSA data, we plan to request explicit consent for the remaining sample members for whom consent has not already been provided. We will also attempt to gain consent for transcript collection from sample members who explicitly refused consent previously. This effort will also collect additional information on the last school(s) attended by sample members, which will aid in collection of transcripts. This process will be piloted with a subset of 600 sample members using the procedures described below. If successful, the approach will be applied to the remaining sample.

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<sup>1</sup> O'Hara, Amy. "Allocated Values in Linked Files." Washington, DC: U.S. Census Bureau, 2007.

Additional details regarding the experimental design are described in Part B, section 4, and results from the experiment and the strategies to be applied to the remaining sample are described in Attachment E.<sup>2</sup>

A previously approved change (NOC 3/29/2018) enabled the study to split this activity to obtain consent and students' last high school attended into two phases. In this ICR, we request approval to postpone the timing of the second phase effort (with 88 percent of the sample) from Spring/Summer 2018 to Spring/Summer 2019. This adjustment ensures that collection of information on last school attended is timed after almost all of the sample will have completed or left high school and therefore that the second wave of transcript collection (already approved) accurately captures transcripts from all transfer schools.

We will contact sample members by mail and e-mail and ask them to provide consent and/or their last school attended by either (a) completing an online form on the study website, (b) signing and returning a hard-copy postage-paid mailer, or (c) calling a toll-free number. Prior to mailing, we will run batch tracing database searches, such as the National Change of Address database, to update addresses for sample members and their parents. Based on the experiment, after batch tracing, cases without good addresses or phone numbers will receive intensive tracing. While we expect that nearly all sample members will be over age 18 at the time of the mailing, some sample members over age 18 may have legal guardians. Sample members over the age of 18 will be asked to provide consent, or asked to give the form to their legal guardian to complete, as appropriate. Parents will be asked to provide consent, or if the sample member can consent on their own behalf, encourage the sample member to complete the form. For sample members who declined consent for transcript collection in 2012, the consent forms will include a request for consent to collect transcripts as well.

Two weeks after initial mail and emails are sent, we will follow-up with nonrespondents by prompting with outbound telephone calls and by sending additional reminder mailings and emails. Outbound calling will continue through the end of the seven-week activity.

**Table A.1. NLTS 2012 Phase II Data Collection and Sources**

<b>Data Source</b>	<b>Estimated Sample</b>	<b>Key Data</b>
<i>Activities Requiring Explicit Consent</i>		
Social Security Administration	3,499 <sup>a</sup>	Employment status, earnings, Vocational Rehabilitation services (e.g., counseling services, psychological services, vocational job training, medical services, supported employment), and Medicaid eligibility and services.
Increased Consent	18,697 <sup>b</sup>	
<i>Activities Not Requiring Explicit Consent</i>		
School District Records	21,959 <sup>c</sup>	Enrollment, attendance, 8 <sup>th</sup> grade and high school state test scores, suspensions,

<sup>2</sup> Based on new guidance from our OGC, we will be sending out a Privacy Act notification to sample members as part of efforts to obtain consents and last school attended information.

		expulsions, whether graduated, type of high school credential, transcripts (courses taken, whether courses are self-contained special education courses, credits earned, grades)
National Student Clearinghouse	21,959	Post-secondary institutions attended, enrollment dates, degree completions
Federal Student Aid	21,959	Type of financial aid received, amount of aid received
<b>Total Sample</b>	<b>21,959</b>	

<sup>a</sup>Will include only those sample members for whom explicit consent was obtained during the Phase I parent or student survey, plus any additional sample members for whom consent is obtained through the Phase II increased consent procedures.

<sup>b</sup>Includes all sample members for whom consent to collect SSA data was not obtained during the Phase I data collection (18,460 sample members), plus 237 additional sample members who previously refused transcript consent.

<sup>c</sup>Includes 2,312 sample members who previously refused consent to collect transcripts and will be included in Phase II increased consent efforts to obtain consent for collecting transcripts. This figure represents the maximum sample size if all sample members are converted through the increased consent procedures. The minimum sample size is 19,647.

## b. How the information will be used

Phase II of NLTS 2012 will provide information on the characteristics and transition outcomes of youth with disabilities that will help policymakers, educators, and parents improve policy and education practice for youth with disabilities. It will describe the secondary and postsecondary trajectories of youth with an IEP and how they differ from those of youth with a Section 504 plan and youth with no identified disability. The study will also examine post-high school outcomes of various subgroups of youth with disabilities and how these outcomes relate to high school experiences and services and supports. The data will be made available to other researchers and practitioners through restricted use files. Table A.2 summarizes the main outcomes that Phase II of NLTS 2012 will examine.

Outcomes will be analyzed in several ways. First, the study will compare youth with an IEP to those with a Section 504 plan as well as to those with no identified disability or condition. Second, the analysis will compare subgroups of youth with an IEP. The subgroups will include ones defined by the federal disability categories; the youth's age, gender, race/ethnicity, and family income; and characteristics of the youth's school and district. Analyses will include statistical tests that measure the extent to which observed intergroup differences are statistically significant. Section A.16 contains additional detail on the kinds of tabulations planned.

**Table A.2. Key Academic, Economic, and Support Outcomes**

Outcome for Youth	Data Source
<b>Academic Skills and School Engagement</b>	
Scores on state academic assessments; grade point average	School Records
High school credits by subject and by level for math	School Records

Repeating current grade level	School Records
Ever expelled; suspended out of school	School Records
School attendance; tardiness	School Records
<b>High School Completion</b>	
Whether obtained diploma and type (regular diploma, GED, certificate of completion)	School Records
<b>Postsecondary Education</b>	
Enrollment by type of program (two-year, four-year, career/technical/business certificate)	NSC
Degree completion by type of credential	NSC
Whether applied for financial aid	FSA
Financial aid received	FSA
<b>Employment</b>	
Employment status (full-time, part-time, unemployed)	SSA
Earnings	SSA
<b>Non-Employment Earnings</b>	
Supplemental Security Income	SSA
Disability Insurance	SSA
<b>Rehabilitative Services and Supports</b>	
Medical and psychological services received	RSA
Supported employment received	RSA
Job training received	RSA

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The contractor will produce four reports. The first will describe high school course-taking patterns, high school completion status, and enrollment and persistence in postsecondary education programs. The second report will examine employment and earnings outcomes and the extent to which youth receive vocational rehabilitative services. Two short reports will update the information in the earlier reports, based on second round collection of records.

### 3. Use of Technology to Reduce Burden

Most of the data in this ICR is already available in records collected for administrative purposes. ***The only data collection creating public burden is the collection of data from school district records and the effort to obtain additional consents for non-educational records matching.***

To reduce burden, districts will be provided with several options to provide data, based on their preferences and technological capabilities. These include the following:

- Uploading data to a secure website;
- Sending electronic transcripts by secure File Transfer Protocol;
- Sending data via email with encrypted attachments;
- Faxing hard-copy transcripts to a secure eFax (electronic) account;
- Sending redacted hard-copy transcripts by overnight express delivery service;
- Sending electronic transcripts via eSCRIP-SAFE; and
- Obtaining transcripts directly through the dedicated SPEEDE server at NSC.

Any requested data elements not available on transcripts will be collected in a spreadsheet template, allowing staff to directly key or copy and paste the student record data. This mode, used on similar

studies, is user-friendly, cost-effective to develop, and the most preferred by school district staff. Where records are only maintained in hardcopy format, districts can either scan the documents, enter the hardcopy information into the templates provided, or submit the hardcopy requested information via overnight delivery.

To reduce burden on sample members or their parents who will be contacted for consent, they can reply by checking a box on a study website or returning a hard copy form in a sealed, postage-paid mailer.

#### **4. Efforts to Avoid Duplication of Effort**

The sample used in this study, NLTS 2012, is the only current source of data on students who are ages 13 to 21 and have IEPs, which includes information collected from youth and their parents. The NLTS2012 is also the only current source of information on a national probability sample of youth with and without disabilities in the same school districts. However, the NLTS 2012 does not contain high school and post-high school outcome data. Phase II of NLTS 2012 will be the only current source of post-high school outcome data for a nationally representative sample of youth with and without disabilities in the same school districts.

#### **5. Methods of Minimizing Burden on Small Entities**

There are 213 small entities from which administrative data will be collected, including 153 districts and 60 charter school LEAs. As part of Phase I, students were selected for the sample at a lower rate from these small entities than from large districts as a way to limit burden. The multiple options for submitting data (see section A3) should further minimize burden on these entities.

#### **6. Consequences of Not Collecting Data**

The data collection described in this submission is essential to documenting, on a nationally representative scale, the outcomes of youth as they transition from school to adulthood. The data collection will also provide an opportunity to learn about the early post-school experiences and outcomes for sample members who have recently left a secondary education program. In addition, this study facilitates a comparison between the experiences of youth with and without disabilities on important postsecondary and employment outcomes over time.

Understanding the postsecondary outcomes of youth with disabilities can inform efforts to improve special education services and help youth make successful transitions to adulthood. This study also provides important information about the type and use of rehabilitative services and supports in place that help facilitate successful outcomes.

These data are essential for policymakers. Analysis of post-high school outcomes provides critical data that can be used to shape education policy in the future for those with disabilities. Improving postsecondary and employment outcomes for transition-age youth with disabilities is an important policy objective for many reasons. In addition to improving the quality of life of these youth and their families, it can reduce the levels of dependency on government-funded programs like Supplemental Security Income.

#### **7. Special Circumstances**

There are no special circumstances involved with the data collection activities for Phase II of NLTS 2012.

## **8. Federal Register Announcement and Consultation**

### **a. Federal Register Announcement**

A 60-day notice to solicit public comments was published in the *Federal Register*, Volume 83, page 62312 on December 3, 2018. No substantive public comments have been received. A 30 day notice will be published.

### **b. Consultations Outside the Agency**

Phase II of NLTS 2012 will be carried out by RTI International (RTI), with subcontractors SRI International and Social Dynamics. ED will seek professional counsel from key contractor study staff as well as from members of the project's Technical Working Group (TWG) on preparations for data collection and analysis plans for collected data. The project's TWG, to be identified after the study is underway, will include up to eight individuals with expertise in secondary and postsecondary education for youth with disabilities, knowledge of and experience using relevant administrative records, and expertise in research methodology and analytic strategies for descriptive studies.

During Phase 1 of NLTS2012, ED consulted with six researchers, one school district administrator, and one former school district administrator who made up the project's Technical Working Group. The group met several times during the course of Phase 1.

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### **c. Unresolved Issues**

There are no unresolved issues.

## **9. Payment or Gift to Respondents**

Districts will be reimbursed for the cost of preparing and sending administrative records data, including transcripts, if they request such reimbursement. Such reimbursements are intended to offset the costs to districts for extra administrative and information technology staff time to extract data, obtain course catalogs where they are not already available online, and answer questions for coding transcript or other records. It is expected that approximately 15 percent of the 430 districts (or 64 districts) would make that request, based on the experience of other ED high school longitudinal studies. The amount to be reimbursed will be negotiated individually with each district and thus will vary across districts. The amount will be based on the district's sample size, a reasonable cost per transcript (typically \$5-\$10 per student), and a reasonable hourly rate for the staff providing student record data.

As part of the increased consent experiment (described in Part B, section 4), a subset of the experimental sample was offered a \$10 incentive during nonresponse follow-up reminders. The incentives proved to be an effective strategy for obtaining consent during the experiment, therefore this offer will be extended to the remaining sample (as already approved in NOA 5/31/2016).

## **10. Confidentiality of the Data**

Administrative records of youth will be collected in accordance with all relevant regulations and requirements. These include the Education Sciences Reform Act of 2002, Title I, Part E, Section 183, that requires “[all] collection, maintenance, use, and wide dissemination of data by the Institute . . . to conform with the requirements of section 552 of Title 5, United States Code, the confidentiality standards of subsections (c) of this section, and sections 444 and 445 of the General Education Provisions Act (20 U.S.C. 1232 g, 1232h).” These citations refer to the Privacy Act, the Family Educational Rights and Privacy Act, and the Protection of Pupil Rights Amendment.

In addition, all individually identifiable information about students, their academic achievements, other related post-high school outcomes, and individual schools shall remain confidential in accordance with Section 552a of Title 5, United States Code, the confidentiality standards subsection (c) and Sections 444 and 445 of the General Education Provision Act. Subsection (c) of Section 183, referenced above, requires the director of IES to “develop and enforce standards designed to protect the confidentiality of persons in the collection, reporting, and publication of data.” The study will also adhere to requirements of subsection (d) of Section 183 prohibiting disclosure of individually identifiable information as well as



making the publishing or inappropriate communication of individually identifiable information by employees or staff a felony.

The confidentiality of all information collected for the study will be protected and used for research purposes only. Personally identifiable data will not be entered into the analysis file; the analysis data records will contain a numeric identifier only. When reporting the results, data will be presented only in aggregate form so that individuals and institutions cannot be identified. A statement to this effect will be included with all requests for data. All members of the study team having access to confidential data will be trained on the importance of confidentiality and data security. All data will be kept in secured locations, and identifiers will be destroyed as soon as they are no longer required.

The following additional safeguards will be employed to carry out confidentiality assurances during the study:

- 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.
- A secure, staffed, in-house computing facility that 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.

The Privacy Act of 1974 applies to this data collection. All collected information will be held in strict confidence, and only disclosed for routine use purposes (5 U.S.C. 552a(e)3). Under no condition will information be made available to district personnel. District staff responsible for assisting with data collection will be fully informed of the policies and procedures regarding confidentiality of data. In addition, the following verbatim language will appear on all applicable study-related materials:

*All information that could be used to identify individuals may be used only for statistical purposes and may not be used in a way that identifies individual participants, except as required by law (ESRA 2002, 20 U.S.C. § 9573; Privacy Act of 1974, 5 U.S.C. § 552a(e)3). When reporting the results, data will be presented so that individuals cannot be identified.*

## **11. Additional Justification for Sensitive Questions**

Since this ICR involves the collection of only administrative records, there are no sensitive questions for this data collection.

## **12. Estimates of Hours Burden**

Because this study relies primarily on administrative data already available through federal agencies or purchasing agreements, the only data collection activities that are expected to result in public burden is the collection of administrative data from school districts and requests for consent from sample members and their parents.

**Estimated hour burden.** As Table A.3 indicates, it is expected that data will be requested from 430 school districts (in which the sample of youth were enrolled), where each Round 1 request should require about 17 hours to complete, and each Round 2 request will require about 7 hours to complete. This burden estimate per school district assumes each district, on average, will be providing data for approximately 50 students in the first round and 20 students in the second round. For newly identified schools that were not part of the Round 1 collection, this burden estimate assumes that each school will be providing data for one student. Additional burden is estimated to obtain explicit consent for the remaining sample members for whom consent has not already been provided for SSA data and for sample members who had previously refused consent for transcript collection. The burden estimate per sample member assumes, on average, 5 minutes for each sample member to review and respond to the consent request letter. This results in a total estimated burden of 13,345 hours. There are no changes to the approved burden.

**Table A.3. Burden Associated with Phase II Data Collection Activities**

Activities	Total N Responses	Average Burden per Response	Total Burden Hours
National Student Clearinghouse Data	NA	NA	0
Federal Student Aid Data	NA	NA	0
Social Security Administration Data	NA	NA	0
Rehabilitative Services Administration Data	NA	NA	0
School Records Data for Youth from School or District (Round 1)	430 districts	17 (hours)	7,310
School Records Data for Youth from School or District (Optional Round 2)	430 districts	7 (hours)	3,010
	2,200 schools <sup>a</sup>	40 (minutes)	1,467
Increased consent for Data Collection: Pilot Sample	600 youth/parents	5 (minutes)	50
Increased consent for Data Collection: Remaining Sample	18,097 youth/parents	5 (minutes)	1,508
Total	21,757		13,345

<sup>a</sup> Optional Round 2 may include collection of transcripts from additional schools attended by sample members, to provide more complete data on their secondary attendance. These additional schools will be identified from the district data collection and contacts with sample members (the increased consent activities). The estimated number of schools is based on data from a multi-transcript collection performed for the High School Longitudinal Study of 2009 (OMB# 1850-0852 v.9, or *High School Longitudinal Study of 2009 (HSL:09) 2013 Update and High School Transcript Data File Documentation* (NCES 2015-036)).

**Estimated cost burden.** Table A.4 indicates that the total estimated cost to school districts for this data collection is \$447,906. This is based on the estimated total burden hours of 11,787 and an average hourly rate of \$38 for districts providing the data (including staff labor hours and associated technology costs). The total estimated cost to sample members for providing consent is estimated to be \$28,044, based on an average hourly wage of \$18 per sample member.

**Table A.4. Cost Associated with Data Collection Activities**

Activities	Total Burden	Average	Total
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	Hours	Hourly Wage	Cost
National Student Clearinghouse Data	NA	NA	\$0
Federal Student Aid Data	NA	NA	\$0
Social Security Administration Data	NA	NA	\$0
Rehabilitative Services Administration Data	NA	NA	\$0
School Records Data for Youth from School or District (Round 1)	7,310	\$38 <sup>a</sup>	\$277,780
School Records Data for Youth from School or District (Optional Round 2)	4,477	\$38 <sup>a</sup>	\$170,126
Increased consent for SSA Data Collection: Pilot Sample	50	\$18 <sup>b</sup>	\$900
Increased consent for SSA Data Collection: Remaining Sample	1,508	\$18 <sup>b</sup>	\$27,144
<b>Total</b>	<b>13,345</b>		<b>\$475,950</b>

<sup>a</sup> The total estimated cost for district staff to provide data is based on the estimated total burden hours of 5,160 multiplied by \$38, which includes salary costs for average labor and computer costs for running programs to extract data.

<sup>b</sup> The total estimated cost to respondents for providing consent is based on the estimated response burden (hours) multiplied by \$18, which was obtained by taking the average of the median weekly earnings of full-time wage and salary workers among high school graduates with no college and individuals with some college or an associate's degree. (Table 5, <http://www.bls.gov/news.release/pdf/wkyeng.pdf>).

### 13. Estimate of Total Annual Cost Burden to Respondents or Recordkeepers

There are no direct or start-up costs to respondents associated with this data collection.

### 14. Estimates of Annualized Cost to the Federal Government

The estimated average annual cost to the federal government for the study—including recruiting districts, designing all collection instruments and computer programs for data retrieval, processing and analyzing the data, and preparing reports—is \$1,633,498 (the total cost divided by the five years of the study). Costs are distributed as follows:

Year 1	FY 2016	\$2,086,025
Year 2	FY 2017	\$1,788,514
Year 3	FY 2018	\$2,197,218
Year 4	FY 2019	\$1,428,159
Year 5	FY 2020	\$667,574
<b>Total</b>		<b>\$8,167,490</b>

### 15. Reasons for Program Changes or Adjustments

This is an extension of collection #1850-0882 for Phase II data collection activities. This submission corrects burden from the previous submission as an adjustment. This results in an increase in burden and

responses of 14,505 responses and 8,897 hours. The total number of responses and burden are 21,757 responses and 13,545 hours respectively.

16. Tabulation, Publication Plans, and Time Schedules

Data from Phase I of NLTS 2012 and administrative data from the sources indicated in Table A.1 will be used to describe post-high school youth outcomes and rehabilitative supports and services received. Table A.5 below lists the broad domains in which information will be collected, and illustrates how the information could be reported by age groups in IES reports on the study.

Basic tabulations of means or distributions of attributes, as appropriate, will be presented by age for youth with an IEP and for all youth with an IEP. All tabulations will be weighted to reflect individual students’ selection probability and nonresponse adjustments. Standard errors of estimates will also be calculated (accounting appropriately for the two-stage and stratified nature of the sample). Differences in means across groups that are statistically significant using a 95 percent confidence interval will be indicated. Because interest centers on the variability of outcomes within and across the federal disability subgroups, similar information will be provided for each subgroup.

Table A.5. Youth Outcomes by Age Group

	15–16	17–18	19–20	21–23	15–23
<b>Rehabilitative Services and Supports</b>					
Medical and psychological services received					
Supported employment received					
Job training received					
<b>Youth Outcomes</b>					
Attendance					
Grades, test scores					
High school completion					
Postsecondary education, training					
Employment and earnings					
Receipt of Social Security Insurance, health insurance, other benefits					
<b>Unweighted Sample Size</b>					

Tabulations like those shown in Table A.6 will be generated to compare the post-high school youth outcomes and rehabilitative supports and services received for students with an IEP and those with no IEP.

Table A.6. Outcomes of Youth with an IEP and Youth with No IEP

	Youth w/ IEP Group A	Youth w/ Section 504 Group B	Youth w/ No IEP, No Section 504 Group C	All Youth Not Identified for Special Ed (Groups B + C)
<b>Rehabilitative Services and Supports</b>				
Medical and psychological services received				
Supported employment received				

	Youth w/ IEP Group A	Youth w/ Section 504 Group B	Youth w/ No IEP, No Section 504 Group C	All Youth Not Identified for Special Ed (Groups B + C)
Job training received				
<b>Youth Outcomes</b>				
Attendance				
Grades, test scores				
High school completion				
Postsecondary education, training				
Employment and earnings				
Receipt of Social Security Insurance, health insurance, other benefits				
<b>Unweighted Sample Size</b>				

**Study Schedule.** Table A.7 summarizes the study’s expected schedule.

**Table A.7. Timeline for NLTS 2012 Phase II Data Collection and Reporting**

Study Milestone	Milestone Date/Period of Activity
Contact districts	Summer 2016
Obtain sample member/parent consent for SSA matching and last school attended	Summer 2016 – Spring 2019
Collect school district administrative data (Round 1)	Summer/Fall 2016
Collect financial aid data (Round 1)	Winter 2018/Spring 2019
Collect postsecondary enrollment and completion data (Round 1)	Winter 2018/Spring 2019
Publish report on student progress toward graduation	Fall/Winter 2020
Collect employment and earnings data (optional – Round 1)	Spring 2019
Collect rehabilitative services and support data (optional – Round 1)	Spring 2019
Publish report on post-high school employment and earnings	Fall/Winter 2021
Collect last school attended for transfer students	Spring/Summer 2019
Collect school district administrative data (optional - Round 2)	Fall 2019 – Spring 2020
Collect financial aid data (optional - Round 2)	Spring 2020
Collect postsecondary enrollment and completion data (optional - Round 2)	Spring 2020
Publish short updating report on high-school and early college outcomes	Summer 2021
Collect employment and earnings data (optional – Round 2)	Summer 2020
Collect rehabilitative services and support data (optional – Round 2)	Summer 2020
Publish short updating report on rehabilitative services, and employment and earnings	Fall 2021

## **17. Approval Not to Display the Expiration Date for OMB Approval**

Approval not to display the expiration date for OMB approval is not requested.

## **18. Exception to the Certification Statement**

No exceptions to the certification statement are requested or required.