

2016/20 Baccalaureate and Beyond (B&B:16/20)
Full-Scale Study Panel Maintenance

Supporting Statement Part A

(OMB # 1850-0926 v.8)

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

March 2019

Contents

A. Justification.....	1
1. Circumstances Making Collection of Information Necessary.....	1
a. Purpose of this Submission.....	1
b. Legislative Authorization.....	2
c. Prior and Related Studies.....	2
2. Purposes and Uses of the Data.....	3
a. B&B:16/20 Purposes.....	3
b. B&B:16/20 Research and Policy Issues.....	3
c. Study Design for B&B:16/20.....	5
3. Use of Information Technology.....	6
4. Efforts to Identify Duplication.....	6
5. Method Used to Minimize Burden on Small Businesses.....	6
6. Frequency of Data Collection.....	6
7. Special Circumstances of Data Collection.....	7
8. Consultants Outside the Agency.....	7
9. Provision of Payments or Gifts to Respondents.....	7
10. Assurance of Confidentiality.....	8
11. Sensitive Questions.....	10
12. Estimates of Response Burden.....	11
13. Estimates of Cost.....	11
14. Costs to Federal Government.....	11
15. Reasons for Changes in Response Burden and Costs.....	12
16. Publication Plans and Time Schedule.....	12
17. Approval to Not Display Expiration Date for OMB Approval.....	12
18. Exceptions to Certification for Paperwork Reduction Act Submissions.....	12

B. Collection of Information Employing Statistical Methods & References

C. References

Appendixes

- A. Technical Review Panel (TRP) Members
- B. Confidentiality for Administrative Record Matching
- C. Sample Member Communication Materials for Panel Maintenance

A. Justification

1. Circumstances Making Collection of Information Necessary

a. Purpose of this Submission

This request is for the National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES), part of the U.S. Department of Education, to conduct the 2016/20 Baccalaureate and Beyond (B&B:16/20) full-scale study panel maintenance activities. This submission covers B&B:16/20 panel maintenance activities plus matching data to administrative records. Currently available information on full-scale study recruitment and survey administration is also included, but more detailed plans and all study materials will be provided in a winter 2019-20 request. Those full-scale study materials will be based on the survey tryouts and focus group materials approved in December 2018 (OMB# 1850-0803 v.242) and currently still underway. B&B:16/20 full-scale study student interview data collection is scheduled to take place from July 2020 through March 2021, and the panel maintenance activity requested in this submission is scheduled to take place from October 2019 through February 2020.

B&B examines students' education and work experiences after they complete a bachelor's degree, with a special emphasis on the experiences of school teachers. The B&B-eligible cohort is initially identified in the National Postsecondary Study Aid Study (NPSAS). The first cohort (B&B:93) was identified in NPSAS:93 and consisted of students who received their bachelor's degree in the 1992-93 academic year. NPSAS:93 provided the base-year data and students were interviewed in 1994 for the initial follow-up. The B&B:93 cohort was surveyed again in 1997 and 2003. The second cohort (B&B:2000) was selected from NPSAS:2000, which became the base year for a single B&B:00/01 follow-up. The third cohort (B&B:08) was selected from NPSAS:08, which became the base year for follow-up interviews in 2009, 2012, and the final follow-up in 2018. The fourth cohort (B&B:16) was selected from NPSAS:16, which is the base year for follow-up interviews in 2017, 2020, and 2026 (anticipated). The B&B:93 and B&B:08 cohorts included transcript collections. Please note that the B&B:08/18 field test and the B&B:16/17 full-scale study were in data collection at the same time. To accommodate this overlap in timing, B&B cohorts prior to B&B:16 are approved under OMB# 1850-0729 while the B&B:16 cohort is approved under OMB# 1850-0926.

Most of the data collection strategies to be employed for the B&B:16/20 full-scale study will be based on the methods used in prior studies. The strategy will include an aggressive, default, or relaxed data collection protocol depending on the group. In the first follow-up with the B&B:16 cohort, B&B:16/17, the groups included: 1) NPSAS:16 interview early respondents (completed the base-year interview within the first three weeks of data collection), 2) NPSAS:16 interview late respondents, 3) NPSAS:16 abbreviated interview respondents, 4) located¹ sample members who did not complete the NPSAS:16 interview, and 5) non-located sample members who did not complete the NPSAS:16 interview. The B&B:16/20 data collection design will build on what was

¹ A sample member is considered located if he or she meets any of the following criteria: final ineligible; completes the survey or verifies his or her identity via the survey; is assigned any final status via telephone efforts (e.g., unavailable for duration of study, incarcerated, deceased, etc.); or is a pending or final refusal. Additionally, if, through telephone efforts, an answering machine confirming the sample member's name is reached, or a household member of the sample member confirms the contacting information, then the sample member is considered located. When intensive tracing efforts are able to confirm contacting information for a sample member, then the case is also considered located.

learned from the B&B:16/17 data collection. Detailed data collection plans by group, including specific protocols and incentive amounts for each group, will be provided in the B&B:16/20 full-scale study request in winter 2019-20.

The B&B:16/20 full-scale study survey will be consistent with B&B:16/17 and B&B:08 cohort surveys, except for some item-level revisions based on results of the survey tryouts and focus groups, being conducted from December 2018 through June 2019. During data collection, we will also ask sample members to upload a recent résumé that can supplement the employment history captured in the full interview. The winter 2019-20 request for full-scale data collection will provide details on the survey design.

This submission includes the following appendixes:

- A membership list of the last Technical Review Panel conducted for the B&B:16 cohort (appendix A);
- A description of the confidentiality procedures in place for the student interview and administrative record matching (appendix B); and
- Contacting materials and address update form for panel maintenance of sample members selected for participation in the B&B:16/17 student survey (appendix C).

b. Legislative Authorization

B&B is a longitudinal series of surveys conducted by NCES in close consultation with other U.S. Department of Education offices, federal agencies, and organizations (see sections A.4 and A.8 of this document). B&B and NPSAS, the base-year study for B&B, are authorized under the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543) and the Higher Education Opportunity Act of 2008 (HEOA, 20 U.S.C. §1015(a)(k)):

“Student aid recipient survey

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

c. Prior and Related Studies

The B&B series provides longitudinal studies of the education, employment, financial, and personal experiences of individuals who have completed a bachelor’s degree at a given point in time. Three B&B cohorts, each sampled about eight years apart, have allowed researchers to evaluate how baccalaureate degree recipients have fared at

differing times in recent history. Bachelor’s degree recipients are identified in NPSAS, a nationally representative trend study of postsecondary students designed to determine how students and their families pay for postsecondary education. B&B:16/20 is the second follow-up of a panel of baccalaureate degree recipients identified in NPSAS:16, and part of the fourth cohort (B&B:16) of the B&B series. The current cohort contains students who earned their bachelor’s degrees in 2015–16.

Table 1 presents the chronology of the previous administrations of the NPSAS study and its associated longitudinal components, including the Beginning Postsecondary Students Longitudinal Study (BPS). For all studies, except B&B:16/20, full-scale data collection was preceded by a field test data collection one year earlier in order to test methods and procedures planned for the full-scale study. In August 2018, NCES determined that a B&B:16/20 field test was not necessary given that several cycles of B&B have been conducted in recent years and most of the survey items anticipated for the B&B:16/20 full-scale data collection have been used in previous cycles of B&B.

The seven major issues addressed in these Sample Surveys Division studies are:

1. Undergraduate access/choice of institution;
2. Persistence;
3. Progress/curriculum;
4. Attainment/outcome assessment;
5. Financial aid and student debt;
6. Access to graduate programs; and
7. Benefits of postsecondary education to individuals and society.

Table 1. Chronology of NPSAS and its longitudinal components

Base year	First follow-up	Second follow-up	Third follow-up
NPSAS:90	BPS:90/92	BPS:90/94	—
NPSAS:93	B&B:93/94	B&B:93/97	B&B:93/03
NPSAS:96	BPS:96/98	BPS:96/01	Administrative data matching only
NPSAS:2000	B&B:2000/01	—	—
NPSAS:04	BPS:04/06	BPS:04/09	Administrative data matching only
NPSAS:08	B&B:08/09	B&B:08/12	B&B:08/18
NPSAS:12	BPS:12/14	BPS:12/17	—
NPSAS:16	B&B:16/17	B&B:16/20	—
NPSAS:20	BPS:20/22	BPS:20/25	—

— Not applicable.

NOTE: BPS = Beginning Postsecondary Students; B&B = Baccalaureate and Beyond.

2. Purposes and Uses of the Data

This section provides information on the purposes of B&B:16/20 and an overview of the primary research issues it addresses.

a. B&B:16/20 Purposes

The primary purpose of the B&B longitudinal study series is to describe the post-graduation pathways of baccalaureate recipients, with a focus on their experiences in the labor market, postbaccalaureate education, and their education-related debt. B&B also focuses on the continuing education paths of science, technology, engineering, and mathematics (STEM) graduates, as well as the experiences of those who have begun careers in education of students through the 12th grade. Since graduating from college in 2015–16, members of this B&B cohort will begin moving into and out of the workforce, enrolling in additional postsecondary education, forming families, and repaying undergraduate education-related debt. Documenting these choices and

pathways, along with individual, institutional, and employment characteristics related to those choices, provides critical information on the costs and benefits of a bachelor's degree in today's workforce.

The B&B series of studies is critical to understanding the education paths of *all types* of bachelor's degree recipients. While these graduates are homogenous in many ways, there are important variations to consider. B&B represents both traditional-age and non-traditional-age college graduates of public, private nonprofit, and for-profit institutions, graduates who began their postsecondary education at a community college, and those who began at a four-year college or university. Findings based on B&B data are presented in multiple publications such as First Look and Statistics in Brief reports, and Web Table publications. The data can also be used to calculate statistics with PowerStats, QuickStats, and TrendStats, web-based software applications available to the public at <https://nces.ed.gov/datalab>, and to qualified researchers through the IES restricted-use data-licensing program.

b. B&B:16/20 Research and Policy Issues

The B&B:16/20 data will allow researchers to address a wide variety of policy-relevant topics, including the consequences of education debt, career paths into and out of STEM fields, the academic preparation and career paths of pre-kindergarten-12th grade teachers, and labor market outcomes of bachelor's degree recipients in the four years following graduation.

Education debt and loan repayment. As the price of college has increased across the country, so has focus on the amount of education debt accrued and the burden of subsequent repayment. Borrowing for undergraduate education is predicated upon the assumption that future employment will allow for repayment of debt. B&B:16/20 will provide the latest information on recent college graduates' debt burden, including their selection of income-driven repayment plans, and whether their income is sufficient to repay their loans. The data will allow an examination of the rates of repayment and default on federal student loans among students who graduated from various types of institutions. It will also allow for an examination of the relationship between loan debt and postbaccalaureate outcomes such as enrollment, employment, and in particular, whether contemporary college graduates make different graduate enrollment and employment decisions than they might otherwise, due to their education-related debt.

Science, technology, engineering, and mathematics. Given the emphasis that policymakers and business leaders place upon college graduates' science, technology, engineering, and mathematics (STEM) expertise, analyzing the paths of graduates with STEM majors will provide information about why and when people move into and out of STEM occupations and graduate programs. The B&B data allow the study of whether college graduates with training in these fields are using that training in the workplace or pursuing graduate education in STEM fields.

The pre-kindergarten-12th (pre-K-12) grade teacher. B&B cohorts have historically focused on kindergarten-12th grade (K-12) teacher recruitment and retention as important issues for education policymakers. B&B's focus on those who enter K-12 teaching after college graduation allows in-depth study of teacher experiences, satisfaction, and mobility into and out of the K-12 teaching profession. Because some states are raising certification and degree requirements to teach pre-K, and in response to a recommendation made by the B&B:16/17 Technical Review Panel (TRP), pre-kindergarten (pre-K) teachers are also included in the definition of

“teachers” studied in the B&B:16 cohort studies. B&B:16’s unique focus on pre-K–12 teachers will allow researchers to compare teachers with their similarly-educated, non-teacher peers in terms of career paths, workplace satisfaction, and salaries.

Labor market outcomes. Finally, the B&B:16/20 will collect data on recent college graduates’ employment and job search experiences approximately four years after graduating. The B&B:16/20 data will allow researchers to examine employment and wages as well as unemployment and under-employment, job satisfaction, job search behavior, and the value of the bachelor’s degree in finding employment.

Some of the primary research and policy issues to be addressed with B&B:16/20 data will be:

(1) Debt and finances;

- How much do bachelor’s degree recipients owe on undergraduate student loans 4 years after college? What is the status of the loans?
- If in repayment, what are the monthly payments? Are parents helping to repay the loans?
- Has student loan debt influenced career or graduate school plans?
- Do graduates consider the loans a worthwhile investment in their future? Would it have been possible to complete college in the same period without the loans?
- What is their total household income including spouses’ or partners’ incomes?
- Do they own or make payments on a home or a vehicle?
- What are their monthly payments for housing, auto loans, and credit cards?
- What is the total debt burden (monthly payments as percent of income) including student loans?
- Are graduates living at home with parents, alone, or with others? Are they married or living with a partner? Do they have any children or other dependents?

(2) Postbaccalaureate enrollment;

- What percentage of recent college graduates apply to graduate or professional institutions, and what percentage enroll within 4 years of completing a bachelor’s degree? What factors are associated with postbaccalaureate enrollment?
- What are their reasons for continuing their education?
- What are the characteristics of those accepted for graduate/professional study who opt to defer enrollment?
- How are they financing their postbaccalaureate education?
- What institutions do they attend and why?
- What types of programs do they pursue?
- What percentage of bachelor’s degree recipients who enroll in graduate education do so in STEM fields, and what proportion of those had undergraduate majors in STEM fields? How does this enrollment relate to graduates’ career paths?
- What paths do college graduates with bachelor’s degrees in STEM fields take after graduation? What percentage obtain employment or enroll in further education in STEM fields? What percentage of graduates who received a non-STEM bachelor’s degree are employed in STEM occupations?

- How are postbaccalaureate enrollment patterns related to demographic characteristics, undergraduate enrollment histories, undergraduate academic performance, and financial factors?
- Among those without postbaccalaureate enrollment, what are their reasons for delaying further education or not planning to attend at all?
- What percentage are continuing education in undergraduate, vocational, or non-degree programs?

(3) Pre-K-12 teaching;

- How did the undergraduate experiences of graduates who taught differ from those of graduates who considered teaching, those who prepared to teach, and other graduates?
- What percentage of college graduates were employed as a teacher within a year of receiving a bachelor's degree? What percentage taught throughout the period?
- What were the experiences of recent college graduates who are in the pre-kindergarten/ elementary/secondary schoolteacher "pipeline" (i.e., those who were trained, certified, or considered teaching as a career)?
- What percentage of recent college graduates applied to and accepted teaching positions?
- What were the reasons for not applying to or not accepting teaching positions?
- Do those who entered teaching feel that they were well prepared?
- What type of teaching position did they hold during the first 4 years, and how effective was the school in assisting them to teach?
- With which aspects of teaching during the first 4 years were they satisfied or dissatisfied?

(4) Labor market outcomes;

- What type of careers are recent college graduates planning, and how successful are they in obtaining jobs leading to future careers within 4 years of graduation?
- How successful are graduates with different majors in finding career-related employment? What is the relationship between graduates' majors and the occupations and industries in which they become employed?
- What were their employment statuses in the months and years following graduation?
- What are the characteristics of the jobs held post-graduation?
- What percentage are employed full-time and part-time, in temporary or permanent positions?
- What is the annual income and what are the monthly wages across jobs held?
- What percentage have participated in job-related training programs?
- How do the B&B:16 cohort's labor market outcomes 4 years after receiving a bachelor's degree compare to those observed among the previous B&B cohorts of 1992-93, 1999-2000, and 2007-08?

Answers to these and other questions are vital to policymakers at the local, state, and national levels to respond adequately to the changing environment of postsecondary education and the labor market.

c. Study Design for B&B:16/20

Data collection for B&B:16/20 will consist of a sample member survey and

administrative data matching. The respondent universe for the B&B full-scale study consists of all persons who completed requirements for the bachelor's degree during the 2015–16 academic year and received their degree by June 30, 2017. These sample members will be surveyed for B&B starting in summer 2020 and into winter 2021. Data from sample members will be collected via an online main survey with a request for résumé upload on the Internet or through web-based CATI.

In addition to the survey, administrative data matching for the B&B:16/20 student sample will be conducted with several sources, including: the National Student Loan Data System (NSLDS), containing federal loan and grant files; the Central Processing System (CPS), which houses and processes data contained in the Free Application for Federal Student Aid (FAFSA) forms; the National Student Clearinghouse (NSC) which provides enrollment and degree verification; vendors of national undergraduate, graduate, and professional student admission tests; and possible other administrative data sources such as the Veterans Benefits Administration (VBA). These data will be obtained through file matching/downloading. We will conduct CPS and NSLDS matches prior to data collection, which begins in July 2020. Tentative dates for additional matches include a CPS match in September 2020 and NSLDS, NSC, and VBA matches in January 2021. A description of the confidentiality procedures in place for administrative record matching is provided in appendix B.

3. Use of Information Technology

To improve efficiency, the B&B:16/20 student interview will use web-based questionnaires across two electronic modes of data collection, a self-administered survey, which is mobile-friendly to allow completion on a tablet or smartphone, and computer-assisted telephone interviewing (CATI). In the B&B:16/17 full-scale study, 61% of surveys were completed on a personal computer, 28% on a handheld device, and 11% were completed through CATI. The survey will be available through a study website that resides on NCES servers.

After completion of the student interview, participants will be offered the opportunity to upload a résumé to the same secure NCES server. Résumé collection for the B&B:16/20 full-scale study is designed to aid in determining data quality collected through the survey by looking for inconsistencies between the interview responses and résumés and will aid in imputations by potentially providing additional information about respondents' employment and education histories.

4. Efforts to Identify Duplication

Efforts to identify duplication have included NCES consultations with other federal offices, such as the U.S. Department of Education's Office of Postsecondary Education; the Office of Planning, Evaluation and Policy Development; and other agencies, such as the Government Accountability Office; the Congressional Budget Office; and the Office of Management and Budget. In addition, NCES collaborates with the National Center for Science and Engineering Statistics (NCSES) at the National Science Foundation (NSF) to ensure that each unit is kept up-to-date on each other's studies pertaining to postsecondary students and institutions. NCES and NSF meet on a regular basis to cover topical issues relevant to both offices and each has staff serving on study TRPs. NCES routinely consults with non-federal associations, such as the American Council on Education, the Career Education Colleges and Universities, the National Association of Student Financial Aid Administrators, the National Association of Independent Colleges and Universities, the Council of Graduate Schools, and the Institute for Higher Education Policy to confirm that data collected through B&B are

not available from any other sources. NCES also consults with academic researchers, several of whom have attended past B&B TRP meetings. Beyond identification of duplication, these consultations provide methodological insights from the results of similar and related studies conducted by NCES, other federal agencies, and nonfederal sources. The consultations also assure that data collected through B&B will meet the needs of the federal government and relevant organizations.

No studies in the U.S duplicate the data produced by B&B. While both B&B and NCES's National Teacher and Principal Survey (NTPS, formerly the Schools and Staffing Survey, or SASS) survey teachers, the studies' aims are different. NTPS includes only K-12 teachers and focuses on teachers' preparation, working conditions, and career development. With the exception of the five-year Beginning Teacher Longitudinal Study (BTLS) that concluded in 2011-12, NTPS does not follow teachers over time. B&B, in contrast, follows graduates for up to 10 years and supports comparisons between graduates who go into teaching with other graduates. The B&B study collects less detailed data than NTPS on current teachers but provides data on graduates who consider or prepare for teaching without taking a teaching job, as well as teachers who leave the teaching profession. Moreover, for the first time, B&B added pre-kindergarten to the definition of teachers included in the survey in 2017.

5. Method Used to Minimize Burden on Small Businesses

Target respondents for B&B:16/20 panel maintenance activities and interviews are individuals and the data collection activities will not involve burden to small businesses.

6. Frequency of Data Collection

A new B&B cohort has been created about every eight years since the first set of studies was initiated with NPSAS:93. B&B:93 and B&B:08 are the two cohorts for which college transcript data were collected. The current B&B study, B&B:16/20, will be conducted 3 years after the first follow-up B&B:16/17 data collection and 4 years after the base-year NPSAS:16 data collection.

NPSAS and its longitudinal spin-off studies, BPS and B&B, are conducted to reflect the large-scale and rapid changes in federal policy concerning postsecondary student aid and fluctuation in sizes of grant and loan amounts. A recurring study is essential to help predict future costs for financial aid because loan programs create ongoing obligations for the federal government for as long as loans are in repayment. Repeated surveys capture the changing nature of the postsecondary environment. With the longitudinal design of the NPSAS survey and B&B follow-ups, representative national samples of bachelor's degree-receiving postsecondary students with similar base-year characteristics can be compared over time to determine the effects of changes in federal policy and programs.

7. Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

8. Consultants outside the Agency

Recognizing the significance of the B&B data collection, several strategies have been incorporated into the project work plan that allow for the critical review and acquisition of comments relating to project activities, interim and final products, and projected and actual outcomes. These strategies include consultations with persons and

organizations both internal and external to NCES, the U.S. Department of Education, and the federal government (see also section A.4 of this document).

Previous B&B implementations have benefited from TRPs composed of staff from several offices in the Department, representatives of OMB, the Congressional Budget Office, the Government Accountability Office, NSF, and the Bureau of Labor Statistics; and non-federal members who are considered experts in postsecondary education issues, including employment and teaching outcomes of baccalaureate recipients. The last B&B TRP meetings were held in December 2016 and December 2017 to inform the B&B:16/17 data collection and the B&B:08/18 data collection, respectively, during which plans for the full-scale study designs for each study were presented and discussed. Given several cycles of B&B in recent years, each of which held TRP meetings to discuss full-scale study design plans, and that most survey items anticipated for the B&B:16/20 full-scale study data collection were administered in previous cycles of B&B, NCES determined that convening a B&B:16/20 TRP was not necessary. This is noted in appendix A, which lists the B&B:16/17 full-scale TRP members.

9. Provision of Payments or Gifts to Respondents

The use of incentives in B&B provides significant advantages to the government in terms of increased overall student response rates, timely data collection, and reduction of bias-inducing nonresponse. In addition, the use of incentives may also result in decreased data collection costs. Therefore, NPSAS:16 study members selected for participation in the B&B:16 cohort study will be offered monetary incentives during data collection.

An incentive will not be offered for completing the B&B:16/20 full-scale study panel maintenance, but for completing the B&B:16/20 interview, sample members will be offered varied incentive amounts based on previous response behaviors. The winter 2019-20 request will provide detailed incentive information as part of the full-scale study data collection plan.

Prior to the start of data collection, B&B:16/20 sample members will be matched to a federal database maintained by the U.S. Department of the Treasury's Office of Foreign Assets Controls (OFAC). OFAC administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals. As part of its enforcement efforts, OFAC publishes a list of individuals and companies called the "Specially Designated Nationals List" or "SDN." Their assets are blocked and U.S. entities are prohibited from conducting trade or financial transactions with those on the list (<https://www.treasury.gov/resource-center/sanctions/Pages/default.aspx>). In order to determine if there are any B&B:16/20 sample members to whom NCES cannot offer an incentive, the sample members will be matched to the SDN using the Jaro-Winkler and Soundex algorithms recommended by OFAC. To avoid over-matching, B&B staff will review the cases based on full name, date of birth, and address. The small number of individuals that NCES anticipates to not be able to confirm as not matching the SDN list will receive a survey request without an incentive offer.

10. Assurance of Confidentiality

NCES assures participating individuals that all information collected under B&B may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).

The primary contractor for this study is RTI International (Contract# ED-IES-13-C-0070). Data security and confidentiality protection procedures have been put in place for B&B:16/17 to ensure that RTI and its subcontractors comply with all privacy requirements, including:

1. The statement of work of this contract;
2. *Family Educational 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. *Cybersecurity Enhancement Act of 2015* (6 U.S.C. §151);
9. *Foundations of Evidence-Based Policymaking Act of 2018, Title III, Part B, Confidential Information Protection*
10. The U.S. Department of Education General Handbook for Information Technology Security General Support Systems and Major Applications Inventory Procedures (March 2005);
11. The U.S. Department of Education Incident Handling Procedures (February 2009);
12. The U.S. Department of Education, ACS Directive OM: 5-101, Contractor Employee Personnel Security Screenings;
13. NCES Statistical Standards; and
14. All new legislation that impacts the data collected through the contract for this study.

Furthermore, RTI will comply with the Department'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: <https://nces.ed.gov/statprog/2012/>.

The B&B:16/20 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. B&B:16/20 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.

B&B:16/20 also utilizes security measures to protect the web survey from unauthorized access in the form of security questions based on data previously collected on NPSAS:16 participants. These questions take the form commonly associated with credit check "pick lists." A survey entrant will be presented with a series of similar answers to a background question (*i.e.* - name of the bachelor's

degree institution) and will be required to answer correctly before beginning (or resuming) the survey. The web survey will also be programmed to prevent backtracking to areas of the survey with personally identifiable information (PII). This measure is intended to prevent unauthorized access to PII within in-progress surveys.

With regards to B&B:16/20 respondents being asked to upload current résumés, the resulting files will be stored on secure NCES servers. Respondents will not have access to the file location beyond uploading their own document. Résumé files will be downloaded to RTI's ESN on a daily basis at the same time and through the same process by which survey data are downloaded. As an alternative data source, résumés are being considered for employment and education data verification purposes and as possible means to increase data submission efficiency and reduce participant burden.

Additionally, security measures have been put in place to protect data during file matching procedures (see section A.3). NCES has a secure data transfer system, which uses Secure Socket Layer (SSL) technology, allowing the transfer of encrypted data over the Internet. The NCES secure server will be used for all administrative data sources with the exception of the NSC, which has its own secure FTP site. 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. 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.

B&B:16/20 and other NCES postsecondary studies include data linkages with many existing sources of valuable data, including Department of Education's (ED) Central Processing System (CPS) for Free Application for Federal Student Aid (FAFSA) data, the National Student Loan Data System (NSLDS), and National Student Clearinghouse (NSC). These NCES studies also obtain data from institution student records and admissions test scores from ACT and The College Board. The Family Educational Rights and Privacy Act (FERPA, 34 CFR Part 99) allows the disclosure of personally identifiable information from students' education records without prior consent for the purposes of B&B:16/20 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.

B&B:16/20 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, including the administrative data linkage, qualifies for a 45 CFR Part 46 waiver of consent based on the following factors:

- There is minimal risk to the participants. There is no physical risk and only minimal risk associated with linkage of data to sample members. The public-use and restricted-use data, prepared as part of the contract with RTI, will not include Social Security Numbers (SSNs), even though these numbers are used for the linkage. Data will undergo disclosure avoidance analysis and disclosure treatment steps to further reduce the risk.

- The waiver will not affect the rights and welfare of the subjects. The voluntary nature of the study is emphasized to sample members. Public-use and restricted-use data are only used for research purposes and lack direct individually-identifying information. The data are further protected through disclosure avoidance procedures approved by the NCES Disclosure Review Board.
- Whenever appropriate, subjects will be provided with additional pertinent information after they have participated. For each round of the study, information about prior rounds and the nature of the study is made available to sample members.
- The study cannot be conducted practicably without the waiver. To obtain written consent from sample members, multiple forms would have to be sent to the sample members with multiple follow-up telephone and in-person visits. This process would add weeks to the data collection process and is not feasible from a time standpoint. Additionally, the value of these data would be jeopardized from a nonresponse bias perspective.
- The potential knowledge from the study is important enough to justify the waiver. These linked data for B&B:16/20 will provide invaluable data to researchers and education policy makers about the federal financial aid that students have received related to their persistence in and graduation from postsecondary education. Rather than relying on students for information about financial aid, we are getting it from the NSLDS, which is the Department's system of recording federally aided student loans taken out and grants received by students. Students generally tend not to be a very reliable source of information about the amounts or timing of grants and loans they have received. This administrative record data is accurate and much easier to obtain than obtaining the same data by administering a questionnaire.

11. Sensitive Questions

The B&B:16/20 interview collects information about earnings, assets, marital and family status, gender identity, and sexual orientation. Regulations governing the administration of these questions require (a) clear documentation of the need for such information as it relates to the primary purpose of the study, (b) provisions to clearly inform sample members of the voluntary nature of participation in the study, as well as assurances that their responses will be treated confidentially.

The collection of data related to income, earnings, assets, indebtedness, and long-range employment outcomes is central to understanding key policy issues driving this study. Financial assets and obligations are important post-graduate outcomes of students and are important indicators of the rate of return of educational experiences to the respondent. The collection of information about marital and family status likewise facilitates the exploration of key policy issues. Financial and family-related obligations also influence decisions about employment, additional education, and loan repayment so it is important to collect information about marital status and dependents. Gender identity and sexual orientation can impact employment and enrollment experiences and outcomes, a topic of growing interest for social research and policy. Several procedures have been implemented (see section A.10) to provide assurances to sample members about the voluntary nature of participation in the study as well as the confidentiality provisions for survey responses.

Social Security Numbers (SSNs) will be needed to 1) conduct file matches to administrative records and 2) maintain the sample for the B&B longitudinal study. File matching to administrative records is a crucial element of the B&B study and would

not be possible without the collection of SSNs. Data obtained from file matching will both minimize respondent burden and increase data quality.

12. Estimates of Response Burden

Based on results from similar activities with the B&B:08 cohort, Table 2 provides the estimated response burden for the B&B:16/20 panel maintenance activity. For informational purposes only, Table 2 also shows the estimated response burden for the main interview, with and without a résumé provided. The interview response burden is not requested in this submission, but will be in the 2019/20 winter submission. Estimating an average hourly rate of \$25² for participating sample members, the 190 total sample member burden hours translate to an estimated respondent burden time cost of approximately \$4,750.

Table 2. Estimated burden to fielded respondents in B&B:16/20 full-scale study

Data collection activity	Sample	Expected eligible	Expected response rate (percent)	Expected number of respondents	Expected number of responses	Average time burden per response (minutes)	Total time burden (hours)
Panel maintenance	25,261	--	15	3,790	3,790	3	190
Full interview, no résumé	25,261	24,269 ¹	55.2	13,397	13,397	35	7,815
Full interview, with résumé	25,261	24,269 ¹	23.7	5,752	5,752	40	3,835
Total	--	--		3,790	3,790	--	190

* Duplicative counts of individuals, not included in respondent totals.

* Percentages are rounded.

¹ Because we have not yet been able to confirm eligibility for the B&B:16 for some of the sample members (i.e., B&B:16/17 nonrespondents), additional ineligible sample members are estimated to be identified in the course of the B&B:16/20 data collection (approximately 992 members are expected to be identified as not eligible).

13. Estimates of Cost

There are no additional costs to the respondents.

14. Costs to Federal Government

The total cost to the federal government for this administration of the B&B:16/20 is \$4,872,195, and the total for requested here panel maintenance is \$40,279. A summary of costs is shown in Table 3. Included in the estimates are staff time, reproduction, postage, and telephone costs associated with the data collection for which clearance is requested.

Table 3. Costs to NCES for the B&B:16/20 full-scale study

B&B:16/20 implementation	Costs to NCES
Panel Maintenance	\$40,279
Full-scale study	
NCES Salaries and expenses	\$330,000
Contract costs	\$3,926,227
Instrumentation and materials	\$808,950
Data collection	\$2,266,861
Systems and data processing	\$1,466,384
Total	\$4,872,195

15. Reasons for Changes in Response Burden and Costs

The apparent decrease in response burden is due to the fact that the previous approval was for the B&B:16/17 full-scale study, while this request is for the B&B:16/20 full-scale panel maintenance only.

² The estimated average student hourly rate was obtained using the average salary of the class of 2017, according to the National Association of Colleges and Employers (<https://www.nacweb.org/about-us/press/2018/overall-starting-salary-for-class-of-2017-remains-flat/>).

16. Publication Plans and Time Schedule

The operational schedule for the B&B:16/20 full-scale study is shown in Table 4. The contract for B&B:16/20 requires multiple reports, publications, and other public information releases, as follows:

- Descriptive summaries of significant findings for dissemination to a broad audience;
- Detailed data file documentation describing all aspects of the full-scale study design and data collection procedures;
- Complete data files and documentation for research data users in the form of both a restricted-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 analysis, and is the basis for TrendStats, which allows users to analyze data across B&B administrations with optional automatic inflation adjustments for dollar values; and
- Special tabulations of issues of interest to the higher education community, as determined by NCES.

Table 4. Operational schedule for B&B:16/20

B&B:16/20 activity	Start date	End date
Full-scale study		
Panel maintenance for B&B:16/20 full-scale study	Oct. 1, 2019	Feb. 1, 2020
Select student sample	Nov. 11, 2019	April 17, 2020
Self-administered web-based data collection	July 20, 2020	Mar. 19, 2021
Conduct telephone interviews of students	July 20, 2020	Mar. 19, 2021
Process data, construct data files	July 20, 2020	Sept. 17, 2021
Prepare/update reports	Jan. 18, 2021	Nov. 11, 2022

17. Approval to Not Display Expiration Date for OMB Approval

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

18. Exceptions to Certification for Paperwork Reduction Act Submissions

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