

2019-20 NATIONAL POSTSECONDARY STUDENT AID STUDY (NPSAS:20)

Supporting Statement Part A

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A. Justification

1. Circumstances Making Collection of Information Necessary

a. Purpose of this Submission

This request is to: conduct the 2019–20 National Postsecondary Student Aid Study (NPSAS:20) full-scale student data collection, consisting of a student record data abstraction and a student survey; conduct panel maintenance activities for a NPSAS:20 follow-up field test (for BPS:20/22); carry over the approved NPSAS:20 Institution Collection (OMB#1859-0666 v.23-24), which will continue after approval of this submission. NPSAS is being conducted by the National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES), part of the U.S. Department of Education. The primary contractor for NPSAS:20 is RTI International (Contract# 91990018C0039), and subcontractors include Leonard Resource Group; HR Directions; ManTech International Corporation (formerly, KForce Government Solutions, Inc.); Research Support Services; EurekaFacts; Strategic Communications; and Activate Research. Dr. Anthony Jones, Dr. Sandy Baum, and Dr. Stephen Porter are consultants for the study.

This submission covers materials and procedures related to the NPSAS:20 student data collection, which includes abstraction of student data from institutions and a student survey, administered primarily as a web survey, and carries over respondent burden, procedures, and materials related to the NPSAS:20 institution sampling, enrollment list collection, and matching to administrative data files as approved by OMB in July and September 2019 (OMB#1859-0666 v.23-24). The materials and procedures described in this submission are based on those developed for previous data collections, including NPSAS:16 (OMB #1850-0666 v.17), the 2012 Beginning Postsecondary Students Longitudinal Study (BPS:12) student record collection (OMB #1850-0631 v.10), the 2008/18 Baccalaureate and Beyond Longitudinal Study (B&B:08/18) (1850-0729 v.14), and the 2017-18 NPSAS Administrative Collection (NPSAS:18-AC) (OMB #1850-0666 v.21). As part of this submission, NCES is publishing a notice in the Federal Register allowing first a 60- and then a 30-day public comment period.

The first NPSAS was implemented by NCES during the 1986–87 academic year (NPSAS:87) to meet the need for national data about significant financial aid issues. Since 1987, NPSAS has been fielded every 3 to 4 years, most recent NPSAS with a student survey component during the 2015–16 academic year (NPSAS:16) and, for the first time, a student administrative records only data collection (with state-level estimates of undergraduate students for all 50 states, the District of Columbia, and Puerto Rico) during the 2017–18 academic year (NPSAS:18-AC). NPSAS:20 will be both nationally- and state-representative. The NPSAS:20 sample will include 125,000 nationally-representative undergraduate and 25,000 nationally-representative graduate students who will be asked to complete a survey and for whom student records and administrative data will be collected. The sample will be augmented with an additional sample of 250,000 undergraduate students to create state-representative samples for undergraduate students overall and in public 2-year and public 4-year institutions. These additional students will not be asked to complete a survey; only their student records and administrative data will be collected. The entire sample of 375,000 undergraduates will also be nationally-representative for estimates based on student records and administrative data. Additionally, NPSAS:20 will serve as the base year for the 2020 cohort of the Beginning Postsecondary Students (BPS) Longitudinal Study and will include a nationally-representative sample of first-time

beginning students (FTBs). Subsets of questions in the NPSAS:20 student survey will focus on describing aspects of the experience of beginning students in their first year of postsecondary education, including student debt and education experiences. In addition, this request includes conducting panel maintenance activities for the BPS:20/22 field test (with a NPSAS:20 subsample of approximately 3,400 students).

This submission describes the planned student data collection procedures and includes [materials marked as “carried over” are those approved for NPSAS:20 Institution Collection (OMB#1859-0666 v.23-24)]:

- a list of individuals on the NPSAS:20 Technical Review Panel (TRP) (Appendix A);
- a list of institutions and associations endorsing and supporting NPSAS:20 (Appendix B; v.24 unchanged);
- a description of the confidentiality procedures in place for the administrative record matching (Appendix C; v.24 unchanged);
- contacting materials for institution staff providing enrollment lists (carried over) & student records (Appendix D);
- student contacting materials (Appendix E);
- results of qualitative testing conducted with institution staff (Appendix F);
- results of qualitative evaluations conducted on student contacting materials and survey content (Appendix G);
- the student records instrument (Appendix H); and
- the student survey instrument (Appendix I).

b. Legislative Authorization

NCES conducts NPSAS:20 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). NCES is authorized to conduct NPSAS under the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543) and the Higher Education Opportunity Act of 2008 [HEOA 2008, 20 U.S.C. §1015(a)(k)]:

“Student aid recipient survey

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

c. Prior NPSAS Studies

As noted above, NPSAS:20 will be the eleventh NPSAS in a series dating back to 1987. Since its inception, the data collection techniques, sources, and sampling and weighting methods used for NPSAS have been updated to meet increasing demand for more precise and detailed information to inform postsecondary student financial aid policy. The first study in the series, NPSAS:87, combined paper-based surveys of 40,000 students enrolled in postsecondary education in the fall term of 1986 and a subset of their parents with institution records. NPSAS:90 expanded the sample to students enrolled in postsecondary education at any time during a full academic year, so that students enrolled only during the summer or spring terms, as well as those who began at any time in institutions not on a traditional calendar system (primarily vocational institutions), were included. NPSAS:90 also introduced computer-assisted telephone interviewing (CATI) and incorporated data from the federal Pell Grant payment file. NPSAS:93 enabled institutions to enter student records electronically, and NPSAS:96 added as data sources the Central Processing System (CPS) for federal financial aid applications, the National Student Loan Data System (NSLDS), and SAT and ACT student test scores.

NPSAS:2000 dropped the parent survey and expanded the sample size to 60,000 students. NPSAS:04 introduced a self-administered web-based student survey option, further increased the sample size to 110,000 students and, for the first time, oversampled undergraduate students in 12 states to permit state-representative estimates for those states. NPSAS:08 retained state-representative oversamples for six states, enlarged the sample size to 130,000 students, and added the National Student Clearinghouse (NSC) as an administrative data source. NPSAS:12, in response to the growing for-profit sector and to ensure reliable estimates at all institution levels, dropped the state-representative samples, but added separate sampling for all levels of the for-profit sector: less-than-2-year, 2-year, and 4-year institutions. In addition, NPSAS:12 was the first cycle to use current-year 12-month institutional enrollment data to ensure more accurate poststratification (weighting) than was achieved using prior-year enrollment data. NPSAS:16 expanded the institution sampling sectors to include a sector for public 4-year institutions that are primarily sub-baccalaureate and added an administrative match to the Veterans Benefits Administration (VBA). Additional details about each of the prior NPSAS studies and related longitudinal studies conducted by NCES are provided at <https://nces.ed.gov/surveys/npsas/>.

Since 1996, NPSAS has been conducted every 4 years and has included administrative file matching, student records collected from postsecondary institutions, and a student survey. The NPSAS:18-Administrative Collection (AC) was the first NPSAS solely reliant on administrative data sources, designed to provide researchers and policymakers with the ability to create national and state-level undergraduate estimates for all 50 states, the District of Columbia, and Puerto Rico (OMB# 1850-0666 v.20-21). NPSAS:18-AC was also the first NPSAS study to be conducted at the midway point in a typical 4-year NPSAS cycle and to not include the student survey. NPSAS:20 is the first attempt to combine regular NPSAS data collection that includes administrative data collection and a student survey with the administrative data collection only per the NPSAS:18-AC design. If the NPSAS:20 collection design is successful, it may be used in the future.

d. Prior and Related Studies

Two longitudinal studies conducted within the Sample Surveys Division of NCES were designed to address a variety of issues regarding higher education. Based on samples

of students enrolled for postsecondary education in a particular year regardless of age, each of these studies incorporates base year data from the cross-sectional NPSAS and extends it through longitudinal follow-up components focusing on first-time students and on recent college graduates in alternate NPSAS survey years: Beginning Postsecondary Students (BPS) and Baccalaureate and Beyond (B&B). The chronology of the previous administrations of the NPSAS study and its associated longitudinal components is presented in table 1.

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	—
NPSAS:2000	B&B:2000/01	—	—
NPSAS:04	BPS:04/06	BPS:04/09	—
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	B&B:16/26 (anticipated)
NPSAS:18-AC	—	—	—
NPSAS:20	BPS:20/22	BPS:20/25 (anticipated)	—

— Not applicable.

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

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.

2. Purposes and Uses of the Data

a. NPSAS:20 Purposes

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

Ultimately, data collected via NPSAS:20 will make important contributions to studies of postsecondary education policy at the federal and state level. The data can be used to calculate statistics with PowerStats, QuickStats, and TrendStats, web-based software applications available to the public at <https://nces.ed.gov/datalab>, and to qualified researchers through the IES restricted-use data licensing program (<https://nces.ed.gov/pubsearch/licenses.asp>).

NCES anticipates distributing data feedback reports to postsecondary institution respondents, state agencies, and other higher education organizations if the report

provides stable estimates. These reports will include data and figures comparing institutional measures from Integrated Postsecondary Education Data System (IPEDS) with estimates from NPSAS:20 by sector at the national level and state level. The reports will underscore the importance of NPSAS data and 'give back' to institutions by providing comparative data with their peers.

A second purpose of NPSAS is to gather base-year data on a subset of students who become the sample for a longitudinal study. NPSAS:20 will establish the base year cohort for a BPS study of first-time beginning undergraduate students, with a follow-up survey 2 years later, in 2022 (BPS:20/22), and an additional follow-up anticipated in 2025. A section of the student survey will capture information about student knowledge, experiences, and perceptions of the costs and benefits of education to support analysis of student choices related to major, persistence, and completion.

b. NPSAS:20 Research and Policy Issues

Many of the important questions that NPSAS:20 aims to address are the same as in the past years. College cost increases, net price levels, and increases in student loan debt will continue to be central issues. The NPSAS:20 data will be used to address policy issues related to changes in federal financial aid programs resulting from the anticipated reauthorization of the Higher Education Act. Moreover, state policymakers and researchers can use state-representative data to address policy questions relevant to students in their state. Following are some of the primary research and policy issues that could be addressed using NPSAS:20 data:

(1) Student demographics;

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

(2) Academic preparation and programs;

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

(3) Financial aid;

- What proportion of students need financial aid, and what is the average amount of need by income?
- What proportion of students has remaining need beyond what they receive in financial aid, and what is the average amount of unmet need?
- What proportion of students receive federal Pell grants, and where do they attend college?
- What proportion of students are receiving aid from states, institutions, employers, and private sources, and what is the average amount received?

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

(4) Price of attendance;

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

(5) Student borrowing;

- What are the differences in the percentage of students borrowing and the average amounts borrowed through the federal student loan programs by institution type, attendance status, class level, and income?
- What proportion of students borrow the maximum Direct (Stafford) Loan amounts?
- What is the difference in the proportion of students receiving subsidized or unsubsidized Direct (Stafford) Loans by dependency and income level?
- What proportion of graduate students borrow and at what rate do they use Graduate PLUS loans to fund their education?
- What is the average cumulative debt of students by class level, especially among graduating college seniors?
- What is the average cumulative debt of graduate students and what portion of that debt was incurred in graduate school?
- What proportion of students borrow private loans, in what amount, and how does this borrowing vary by institution type?

(6) Student employment;

- What proportion of students engage in paid work while enrolled and what are the average hours per week they work?
- What is the average amount earned from work while enrolled?
- What proportion of students is employed by their institution in work-study and graduate assistantships as compared with other types of employment?

(7) Sources of funds;

- What types of financial support are dependent students receiving from their parents?

(8) State-level policy questions;

- What proportion of students receive state merit-based, need-based, or non-need-based aid?
- What proportion of state merit-based aid is awarded to students attending 4-year public institutions, 2-year public institutions, 4-year private non-profit institutions, or private for-profit institutions?
- What proportion of students receiving state need-based aid borrow federal loans, and what is the average amount of federal loans borrowed?
- What are the racial demographics and average income of students receiving state need-based aid?

Answers to these and other questions are vital if policymakers at the local, state, and national levels are to respond adequately to the changing environment of postsecondary education. Since inception, the NPSAS, BPS, and B&B series have resulted in numerous NCES publications addressing these issues. These reports can be found at: <https://nces.ed.gov/pubsearch/>.

3. Use of Information Technology

The NPSAS:20 student survey will use web-based questionnaires across two electronic modes of data collection: a self-administered survey, which is mobile-friendly to allow completion of the survey on a tablet or smartphone, and CATI. The survey will be available through the study website that resides on NCES servers.

NPSAS:20 student records data will be collected using the Postsecondary Data Portal (PDP) website, which will already be in use by institutions to provide enrollment lists. The PDP website is used across NCES institution data collections. Separate login credentials are created for each user at the participating institution. For NPSAS:20, postsecondary institutions will be offered three modes for providing data (see section 5 of this document for more detail).

On a nightly basis, the data collection contractor will download student record and student survey data to their Enhanced Security Network (ESN) via a secure web service. Once in the ESN, data will be cleaned and undergo quality analysis. The websites used for the NPSAS:20 data collection will reside on NCES' Secure Socket Layer-certified (SSL) servers with a secure data connection. SSL protocol is used to encrypt the data transmitted over the Internet, and all parts of the websites that collect student data are password protected. The forms that gather data on these websites will require session cookies to run in accordance with the U.S. Department of Education's privacy policy for the use of cookies. The most recent versions of Microsoft Internet Explorer, Google Chrome, and Mozilla Firefox allow for rejecting all cookies other than those required for session tracking.

4. Efforts to Identify Duplication

Efforts to identify duplication have included NCES consultations with other federal offices, such as the U.S. Department of Education's Office of Postsecondary Education; the Office of Planning, Evaluation, and Policy Development; and other agencies, such as the Government Accountability Office; the Congressional Budget Office (CBO); and the Office of Management and Budget (OMB). In addition, NCES collaborates with the National Center for Science and Engineering Statistics (NCSES) at the National Science Foundation (NSF) to ensure that each unit is kept up to date on each other's studies pertaining to postsecondary students and institutions. NCES and NSF meet on a regular basis to cover topical issues relevant to both offices, and each has staff serving on study TRPs. NCES routinely consults with nonfederal associations, such as

the American Council on Education, the Career Education Colleges and Universities, the National Association of Student Financial Aid Administrators, the National Association of Independent Colleges and Universities, the Council of Graduate Schools, the Institute for Higher Education Policy, the State Higher Education Executive Officers Association, and the National Association of State Student Grant and Aid Programs to confirm that data collected through NPSAS are not available from any other sources. NCES also consults with academic researchers, several of whom attend the NPSAS TRP meetings. Beyond identification of duplication, these consultations provide methodological insights from the results of similar and related studies conducted by NCES, other federal agencies, and nonfederal sources. The consultations also assure that data collected through NPSAS will meet the needs of the federal government and relevant organizations. No studies in the United States singularly duplicate the data produced by NPSAS.

5. Method Used to Minimize Burden on Small Businesses

The burden associated with enrollment list collection is relatively low for all institutions, including small businesses that may be contacted as part of the NPSAS:20 full scale (for-profit schools and other small public and private schools). NPSAS:20 is asking for a readily-available set of variables on the enrollment lists, and institutions will be offered alternative methods of providing requested data, including uploading to a secure website or emailing encrypted list files. We will attempt to minimize the intrusion and burden to such schools by working closely with a school-appointed coordinator before the data collection effort to identify the sources of information within the school and the format in which records are kept. We have also discussed enrollment list variables with the technical review panel to ensure that the request is minimally burdensome and consistent with typical recordkeeping at postsecondary institutions. In addition, to make participation as easy as possible for institutions in Puerto Rico, the letters sent to the chief administrator and coordinator as well as the study brochure and the Quick Guide to NPSAS:20 (Appendix D) have been translated to Spanish and will be sent to institution staff at institutions in Puerto Rico.

For-profit, private not-for-profit, and public institutions will be asked to provide student record data. NPSAS:20 will offer a choice of three modes for submitting the requested data: web mode, Excel mode, and CSV mode. Institutions that cannot provide data in one of these modes will have the option of using an alternate upload page that will accept data in any format; this alternate mode will be offered on a case-by-case basis. These options aim to minimize burden on institutions, which may select the most convenient and least burdensome format(s) for their staff and record-keeping systems. The data entry modes available to participating institutions are described in section B.3 of the Supporting Statement Part B.

NCES designed the Postsecondary Data Portal website as a static collection instrument applicable to NPSAS and other future NCES studies (including longitudinal sample surveys). NCES anticipates minimizing changes to the data collection instrument so that institutions can repeat procedures and re-use old programming code to extract data from their databases. Institutions have the option to upload notes, database queries, or other resource documents that will help them complete future data requests with less effort; these documents will be provided back to the institution at the time of the future request. Additionally, NCES will provide resources to reduce burden on institutions including frequently asked questions and instructional videos. Over time, through such means, NCES staff hope to mitigate the increased burden of a more frequent data collection.

The student survey does not involve small businesses or entities.

6. Frequency of Data Collection

Large-scale and rapid changes in federal policy concerning postsecondary student aid necessitate frequent studies that provide accurate and up-to-date information necessary for informed decision making. More federal policymaking is occurring outside the Higher Education Act renewal process through regulation, the budget appropriation process, and Reconciliation. This has resulted in more changes to the Federal Student Aid (FSA) programs compared to when the Higher Education Act was reauthorized on a set schedule. From year to year, eligibility restrictions change, the Free Application for Federal Student Aid (FAFSA) changes (e.g., simplification and prior-prior year income), size of grant and loan amounts fluctuate, and the balance between various aid options changes dramatically. Because these changes affect students' ability to finance postsecondary education and the level of debt students accumulate, frequent data collections are necessary. Moreover, the dynamic nature of the postsecondary environment itself calls for more frequent data collection. For example, notable closures among for-profit institutions have consequences for the postsecondary climate and student financing, as do changes in private-sector lending, increases in tuition and fees, and changes in federal student aid policies. Effects of these changes on federal policy and postsecondary education participation create an opportunity, as well as a need, for frequent monitoring on a regular basis.

7. Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

8. Consultants Outside the Agency

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

Previous NPSAS implementations have benefited from a TRP composed of staff from several offices in the Department of Education; representatives of NSF, OMB, and CBO; and nonfederal members who are considered experts in postsecondary education issues, including financial aid (a list of the TRP members is provided in Appendix A). A TRP meeting, which included a web conference with state-based agency representatives from across the country, was held in November 2018 to inform the NPSAS:20 institution data collection activities, specifically the student enrollment list and student records collection. Another TRP was held in May 2019 to discuss student survey data collection activities.

A nonsubstantive public comment was received that did not require changes to this request.

9. Provision of Payments or Gifts to Respondents

The use of incentives for completion of the student survey can provide significant advantages to the government in terms of increased response rates and higher quality data with minimal nonresponse bias. In addition, the use of incentives may also result in decreased data collection costs due to improved efficiency. The following section summarizes plans for payments to students for the survey and to institutions.

a. Student Sample Members

All eligible cases in the NPSAS:20 full-scale study will be offered a monetary incentive for completing the student survey. Below we describe plans for an experiment using a subset of cases – a calibration sample –to determine the final incentive plan that will be implemented for the remainder of the data collection with the remainder of the sample. More information regarding the timing and distribution of the incentives for the calibration and main samples, as well as the results of the calibration experiment and the final incentive plan, is provided in the Supporting Statement Part B of this submission.

Table 2 describes the various incentives included with the two experimental phases of the calibration sample design. Phase 1 will test the baseline incentive, and Phase 2 will test the nonresponse follow-up incentive. All remaining nonresponding calibration sample cases at the end of Phase 2 will be moved to Phases 3 and 4, where abbreviated and nonresponse instruments will be offered (see proposed main data collection design in section 4 of Part B).

Table 2. Calibration sample design by condition and phase of data collection

	Group 1 n = 2,000	Group 2 n = 2,000	Group 3 (Control) n = 2,000
Phase 1	\$2 prepaid + \$30 promised	\$2 prepaid + \$15 promised	\$0 prepaid + \$30 promised
Phase 2 (nonresponse follow-up)	\$10 prepaid (via PayPal or check) + \$20 promised		\$30 promised

In Phase 1, two components of our incentive plan will be tested - the effectiveness of a \$2 prepaid cash incentive, sent with the invitation letter, and frontloading or backloading of the promised incentive (offering \$30 from the beginning vs. offering \$15 that gets doubled at a later phase). Evidence from many surveys across various modes of data collection indicates that prepaid incentives are more effective than promised incentives in increasing response rates (e.g., Singer et al. 1999; Singer, 2002; Warriner et al., 1996). We will test the effectiveness of a \$2 prepaid cash incentive on Phase 1 response rates by comparing Groups 1 and 3 in table 2.

The Control Group will receive the \$30 promised incentive that has been used in NPSAS studies since 2004 and has proven to be effective. We are interested in investigating whether offering a smaller, \$15 incentive from the beginning followed by a doubled incentive later in the case of initial nonresponse will be more effective than offering \$30 initially. We will test this experimentally by comparing the results in Phase 1 from Groups 1 and 2.

In Phase 2, we propose a different presentation of the same \$30 incentive – for experimental Group 1, we will prepay \$10 via PayPal or check, and offer the rest as promised. For Group 2, we will double the incentive offered in Phase 1 and offer \$30 upon survey completion. For the control group, Group 3, we will continue to offer the same \$30 promised incentive. The comparisons between Groups 1 and 2 at the end of Phase 2 will further inform whether frontloading or backloading of the incentive is better for response rates and representativeness.

With the exception of the \$2 prepaid incentive (which will be paid in cash to sample members with a good mailing address and by PayPal, the online money transfer service, to those without a good mailing address but with a good e-mail address), all promised incentives for the NPSAS:20 full-scale study will be paid by the sample member’s choice of check or PayPal. Any Group 1/Phase 2 sample members who contact us and indicate a preference for check over PayPal can be issued a check.

Prior to the start of data collection, NPSAS: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 NPSAS: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, NPSAS:20 staff will review the cases based on full name, date of birth, and address. The small number of individuals who cannot be confirmed as not matching the SDN list will receive a survey request without an incentive offer.

b. Institutions

Institutions may require reimbursement for the cost of time spent preparing and providing enrollment lists and student records. Expenses will be reimbursed to the extent that they are reasonable and properly documented. Mailings to institutions may include pens, notepads, or other small courtesy items bearing a logo related to the study or NCES, which will serve as reminders to institution staff and provide tokens of appreciation for their efforts. These items may also be distributed at conferences attended by potential NPSAS institution participants.

10. Assurance of Confidentiality

The primary contractor for this study is RTI International. Confidentiality and data security protection procedures have been put in place for NPSAS:20 to ensure that the contractor and its subcontractors comply with all privacy requirements, including:

1. The statement of work of this contract;
2. *Family Educational Rights and Privacy Act (FERPA) of 1974* (20 U.S.C. §1232(g));
3. *Privacy Act of 1974* (5 U.S.C. §552a);
4. *Privacy Act Regulations* (34 CFR Part 5b);
5. *Computer Security Act of 1987*;
6. *U.S.A. Patriot Act of 2001* (P.L. 107-56);
7. *Education Sciences Reform Act of 2002* (ESRA 2002, 20 U.S.C. §9573);
8. *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, the contractor will comply with the Department of Education's IT security

policy requirements as set forth in the Handbook for Information Assurance Security Policy and related procedures and guidance, as well as IT security requirements in the Federal Information Security Management Act (FISMA), Federal Information Processing Standards (FIPS) publications, Office of Management and Budget (OMB) Circulars, and the National Institute of Standards and Technology (NIST) standards and guidance. All data products and publications will also adhere to the revised NCES Statistical Standards, as described at the website: <https://nces.ed.gov/statprog/2012/>.

By law (20 U.S.C. §9573), a violation of the confidentiality restrictions is a felony, punishable by imprisonment of up to 5 years and/or a fine of up to \$250,000. The NPSAS: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. NPSAS:20 follows detailed guidelines for securing sensitive project data, including, but not limited to: physical/environment protections, building access controls, system access controls, system login restrictions, user identification and authorization procedures, encryption, and project file storage/archiving/destruction.

Additionally, the contractor will take security measures to protect the web data collection applications from unauthorized access. The web server will include an SSL certificate and will be configured to force encrypted data transmission over the Internet.

Student survey. Respondents to the student survey will be required to confirm their identity with each log in session. Respondents who begin the survey but do not complete it will have the option to re-enter by logging in as they did the first time around, or using a link provided to them in reminders to begin on the welcome page (the page right after the log in). To protect the confidentiality of survey responses in the student survey, the respondent will not be able to view the answers they completed (i.e. no ability to use the survey's navigation buttons to go to "Previous" survey questions from previous log in sessions). Therefore, student respondents are limited to viewing only survey responses that occur in each unique log in session. To further ensure confidentiality, the student survey automatically logs out of a survey session after 20 minutes of inactivity.

Institution data collection. All files uploaded to the institution data collection website will be stored in a secure project folder that is accessible and visible to authorized project staff only. To access restricted pages containing protected information, website users will be required to log in by entering an assigned ID number and password. Through the institution data collection website, the primary coordinators at the institution will be able to use a "Manage Users" link, available only to them, to add and delete user accounts for other staff at the same institution. The new users will be assigned a temporary password, which they will be required to change upon logging in to the website for the first time.

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

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

NPSAS:20 and other NCES postsecondary studies include data linkages with many existing sources of valuable data, including Department of Education's CPS for FAFSA data, NSLDS, and NSC. These NCES studies also obtain data from postsecondary institution student records, information on military service records from VBA, and admissions test scores from ACT and The College Board. Many of these administrative data matches are not guaranteed and will require separate Memorandums of Understanding, Agreements, or Contracts with the entities owning or responsible for the individual data elements.

Regarding file matching with administrative sources, the Family Educational Rights and Privacy Act (FERPA, 34 CFR Part 99) allows the disclosure of personally identifiable information from students' education records without prior consent for the purposes of NPSAS: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."

NPSAS: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 the data collection contractor, will not include Social Security Numbers (SSNs) or other extremely sensitive Personally Identifiable Information (e.g., name, birthdate, etc.) even though these data elements are used for the linkage. Data will undergo disclosure avoidance analysis and disclosure treatment steps to further reduce the risk.
- The waiver will not affect the rights and welfare of sampled students. Public-use and restricted-use data are only used for research purposes and lack direct individually-identifying information. The data are further protected through disclosure avoidance procedures approved by the NCES Disclosure Review Board.
- The study cannot be conducted practicably without the waiver. Data will be collected from postsecondary institutions, and there will be no direct contact with sampled students. To obtain written consent from sampled students, multiple forms would have to be sent to them with multiple follow-up telephone and in-person visits. This process would add weeks to the data collection process and is not feasible from a time standpoint. Additionally, the value of these data would be jeopardized from a nonresponse bias perspective.

The following language will be included, as appropriate, in respondent contact materials and on data collection instruments for the (a) student survey and panel maintenance and (b) enrollment lists and student records collection:

a. Student Survey and Panel Maintenance

On student and panel maintenance respondent contact materials, as appropriate:

NCES is authorized to conduct the 2019-20 National Postsecondary Student Aid Study (NPSAS:20) by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543) and to collect students’ education records from educational

agencies or institutions for the purpose of evaluating federally supported education programs under the Family Educational Rights and Privacy Act (FERPA, 34 CFR §§ 99.31(a)(3)(iii) and 99.35). The data are being collected for NCES by RTI International, a U.S.-based nonprofit research organization. All of the information you provide may be used only for statistical purposes and may not be disclosed, or used, in identifiable form, for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).

In addition to the language above, on data collection instruments, as appropriate:

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this voluntary information collection is 1850-0666. The time required to complete this information collection is estimated to average approximately 30 minutes per survey response, including the time to review instructions, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this survey, or any comments or concerns regarding the status of your individual submission of this survey, please write directly to: The 2019-20 National Postsecondary Student Aid Study (NPSAS:20), National Center for Education Statistics, Potomac Center Plaza, 550 12th St., SW, Room 4007, Washington, DC 20202. OMB Clearance No: 1850-0666 Expiration Date: xx/xx/xxxx

b. Enrollment Lists and Student Records

On institution contact materials, as appropriate:

NCES is authorized to conduct the 2019-20 National Postsecondary Student Aid Study (NPSAS:20) by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543) and the Higher Education Opportunity Act of 2008 (HEOA 2008, 20 U.S.C. §1015). The data are being collected for NCES by RTI International, a U.S.-based nonprofit research organization. All of the information provided by individuals or institutions may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).

The Family Educational Rights and Privacy Act of 1974 (FERPA, 20 U.S.C. §1232g) allows for the release of institution record information to the Secretary of Education or her agent without prior consent of survey members (34 CFR §§ 99.31(a)(3)(iii) and 99.35).

In addition to the language above, on data collection instruments, as appropriate:

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control numbers for the voluntary information collections using this website are listed below. The time required to complete this information collection is estimated to average the number of minutes or hours listed below per response, including the time to review instructions, search existing data sources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this information collection, or any comments or concerns regarding the status of your individual submission of

these data, please write directly to: Postsecondary Data Portal studies, National Center for Education Statistics, PCP, 550 12th St., SW, Room 4007, Washington, DC 20202.

OMB Clearance Number 1850-0666 Expiration Date: xx/xx/xxxx
NPSAS:20 Student Enrollment List Collection: 5 hours
NPSAS:20 Student Records Collection: 30 hours

11. Sensitive Questions

The student survey collects information about earnings, assets, and marital and dependency statuses. 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, and (b) provisions to clearly inform sample members of the voluntary nature of participation in the study, as well as information about how their responses will be protected and 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).

Financial data related to earnings and assets, as well as marital and dependency statuses are key items used in calculating need for financial aid, parental contributions, and financial aid awards. Consequently, the data elements are critical to the conduct of policy-related analyses and to the modeling and projection of the effects of federal program changes on students and on program costs.

New data elements capturing food security and homelessness are critical to measure how well the basic needs of postsecondary students are being met. The NPSAS:20 student survey will be the first federal survey to collect food security data on a national postsecondary student population. Measures of postsecondary student food security in the student survey address prior public comments submitted during the review of the NPSAS:18-AC clearance package (OMB# 1850-0666 v.20). Consultation with U.S. Department of Agriculture (USDA) staff and other external content experts identified U.S. Household Food Security items appropriate to include. The U.S. Household Food Security items from the USDA have been rigorously tested using a postsecondary student population to collect data for policy-related analyses on the basic needs of students.

Although NPSAS:16 included a measure of homelessness based upon FAFSA questions, NPSAS:20 includes an additional measure of homelessness. This item maps onto the McKinney-Vento (42 US Code §§11431-11435) definition of homelessness and has been used in several large-scale postsecondary student studies. The addition of the food security and homelessness measures will allow us to use nationally representative data to better understand whether the basic needs of postsecondary students are being met.

Institutions will be asked to provide personally-identifying information for students on the enrollment lists (including name, contacting information, Social Security Numbers (SSNs), and date of birth (DOB)). Although considered sensitive, items collected on the enrollment lists will facilitate: 1) selection of the student sample, 2) initial tracing and locating activities, and 3) ongoing follow up with the first-time beginning student cohort as part of BPS:20. Immediately after the student sample is selected, the SSNs for non-selected students will be securely discarded.

SSNs also will be needed to: 1) conduct file matches to administrative records and 2) maintain the sample for the BPS longitudinal study. File matching to administrative

records is a crucial element of the NPSAS 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.

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.

12. Estimates of Response Burden

Table 3 provides estimates for NPSAS:20 response burden, based on experiences from prior NPSAS cycles. The response time for participating institutions will vary based on how institutions keep their records and how easily they can extract the requested information. The NPSAS:20 institution data collection includes four activities:

- 1) responding to eligibility-screening calls, which will be made only to sampled institutions for whom contact information could not be located through other sources (we estimate 853 institutions to fulfill this criteria in NPSAS:20, based on our experience in prior administrations of NPSAS);
- 2) completing the Institution Registration Page (IRP), which collects basic information about institutional characteristics and term structure (we estimate that of the 3,106 institutions sampled, 99 percent will be eligible for NPSAS, based on our experience in prior administrations of NPSAS);
- 3) providing electronic lists of all students enrolled during the academic year either by uploading a file to the secure PDP website or e-mailing an appropriately encrypted file directly to the data collection contractor. (Based on NPSAS:16 and NPSAS:18-AC results, we expect that most NPSAS:20 enrollment lists will be uploaded to the project website, and very few enrollment lists will be sent via email); and
- 4) providing student records data for the institution's sampled students.

Using time burden data for similar institutional data collection tasks, we estimate the average burden associated with preparation of the enrollment list to be approximately 5 hours per institution and the student records collection to require approximately 30 hours per institution.

We expect the student survey to require approximately 30 minutes, on average, for completion.

Assuming average hourly cost of \$41.59¹ for institution staff and \$20¹ for participating students, the 131,801 total burden hours are estimated to translate to \$4,503,707 total burden time cost to NPSAS:20 respondents.

¹ The hourly rate of \$41.59 for institution staff was obtained using the hourly mean wage of operations research analysts in the May 2017 National Occupational and Employment Wage Estimates sponsored by the Bureau of Labor Statistics (BLS). Source: BLS Occupation Employment Statistics, <http://data.bls.gov/oes/> data type: Occupation codes: Operations Research Analysts (15-2031); accessed on March 1, 2019. The hourly rate of \$20 for students was obtained by averaging 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>).

Table 3. Average estimated burden to institution and student respondents for the NPSAS:20 data collection

Data collection activity	Sample	Expected eligible	Expected response rate (percent)	Expected number of respondents	Expected number of responses	Average time burden per response (mins)	Total time burden (hours)
Institutional collection							
Eligibility-screening calls	853	845	100	845	845	5	71
Institution registration page	3,106	3,075	85	2,614	2,614	10	436
Institutional enrollment lists	3,106	3,075	85	2,614 ⁴	2,614	300	13,070
<i>Institutional collection subtotal¹</i>				2,614	6,073		13,577
Student collection							
Student record collection ²	2,614	2,614	93	2,431 ⁴	2,431	1,800	72,930
Student survey							
Full survey	150,000	142,500	60	85,500	85,500	30	42,750
Abbreviated survey	150,000	142,500	10	14,250	14,250	10	2,375
NRFU survey	150,000	142,500	2	2,850	2,850	3	143
BPS:20/22 field test panel maintenance	3,400	---	15	510 ⁴	510	3	26
Student collection subtotal¹				105,031	105,541		118,224
Total				105,214³	111,614		131,801

¹ Gray font depicts activities for which burden is being carried over but not requested in this submission as it was approved in the NPSAS 2020 institution data collection package (OMB# 1850-0666 v.23-24). The subtotals for the student collection represent all burden newly requested in this submission.

² The sample for student record collection is the number of institutions that provide enrollment lists for student sampling.

³ This total count represents the unduplicated sum of all estimated student survey respondents plus the number of estimated responding institutions.

⁴ These expected numbers of respondents are not included in the subtotal and total count because these respondents are accounted for in cell above.

NOTE: NRFU = Nonresponse Follow Up.

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 the NPSAS:20 full-scale study is \$15,161,700, of which \$765,320 is for institution contacting and enrollment list collection, \$14,818,500 for student survey and student record data collection requested in this submission, and \$13,200 for the BPS:20/22 field test panel maintenance activities. A summary of costs is shown in table 4.

Table 4. Costs to NCES for the NPSAS:20 full-scale study

NPSAS:20 main study implementation	Costs to NCES
NCES Salaries and expenses	\$330,000
NPSAS:20 main study implementation	
Contract costs	\$14,818,500
Instrumentation and materials	\$1,468,100
Data collection	\$9,255,600
Systems and data processing	\$4,094,800
BPS:20/22 field test panel maintenance	\$13,200
Total	\$15,161,700

15. Reasons for Changes in Response Burden and Costs

The apparent increases in total burden hours from the last approved is due to the fact that the last request was for NPSAS:20 registration page and enrollment list collection from institutions, while this request carries over those activities and adds the student records collection from institutions and administration of a survey to students.

16. Publication Plans and Time Schedule

The operational schedule for the NPSAS:20 full-scale study is shown in table 5. The following NPSAS:20 reports, publications, and other public information releases are planned:

- descriptive summaries of significant findings for dissemination to a broad audience;
- detailed data file documentation describing all aspects of the full-scale study design and data collection procedures;
- complete data files and documentation for research data users in the form of both a restricted-use file; QuickStats, a public-use data analysis system in which users create their own tables and charts using predefined categories from a subset of variables; and PowerStats, a public-use data analysis system in which users create their own tables and charts using all of the variables, in addition to conducting regression analysis, and which is the basis for TrendStats that allows users to analyze data across NPSAS administrations with optional automatic inflation adjustments for dollar values (NCES may release a Public Use microdata file if it is technically feasible after disclosure review); and
- special tabulations of issues of interest to the higher education community, as determined by NCES.

Table 5. Operational schedule for NPSAS:20

	Start date	End date
NPSAS:20 activity		
Full-scale study		
Contacts with institutions	Oct. 16, 2019	Nov. 20, 2020
Calibration sample		
Enrollment list collection – calibration sample	Nov. 7, 2019	Dec. 31, 2019
Select student sample	Nov. 18, 2019	Feb. 23, 2020
Self-administered web-based data collection	Mar. 10, 2020*	May 19, 2020
Conduct telephone surveys of students	Mar. 10, 2020*	May 19, 2020
Main Sample		
Enrollment list collection – main sample	Jan. 10, 2020	Jul. 10, 2020
Select student sample	Jan. 21, 2020	Jul. 20, 2020
Collect student data from institutional records	Mar. 2, 2020	Nov. 13, 2020
Self-administered web-based data collection	Apr. 13, 2020	Dec. 4, 2020
Conduct telephone surveys of students	Apr. 13, 2020	Dec. 4, 2020
Process data, construct data files	Jan. 13, 2020	Dec. 10, 2020
Prepare/update data collection reports	Jan. 13, 2020	Dec. 18, 2020
BPS:20/22 field test panel maintenance	Oct. 1, 2020	Feb. 1, 2021

*Dependent upon OMB review and approval.

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.