

High School and Beyond 2022 (HS&B:22)
First Follow-up Field Test Data Collection

OMB# 1850-0944 v.10

Supporting Statement Part A

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

July 2023

Table of Contents

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

A. Justification

A.1 Circumstances Making Collection of Information Necessary

A.1.a Purpose of this Submission

The High School and Beyond Longitudinal Study of 2022 (HS&B:22) is the sixth in a series of longitudinal studies at the high school level conducted by the National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES) of the U.S. Department of Education. HS&B:22 is following a nationally representative sample of ninth grade students from the start of high school in the fall of 2022 to the spring of 2026 when most will be in twelfth grade. The sample will be freshened in 2026 to create a nationally representative sample of twelfth-grade students. A high school transcript collection and additional follow-up data collections beyond high school are also planned.

A field test was conducted in fall 2019 with 9th and 12th grade students, and the first follow-up field test (F1FT) is planned for spring 2024 in preparation for the spring 2026 first follow-up full-scale study (F1FS). The follow-up student data collection for the 9th grade field test cohort will no longer take place due to the coronavirus pandemic and a new sample of students will be selected. This submission is to request approval to conduct the HS&B:22 F1FT collection in the spring of 2024. OMB provided approval for F1FT sampling, tracking, and recruitment in March 2021 (OMB# 1850-0944 v.9).

Part A of this submission presents information on the basic design of HS&B:22. Part B discusses the statistical methods employed. Part C presents justification for the questionnaire content. Appendix A provides the communication materials to be used during state, school district, school, student, and parent F1FT recruitment and data collection activities. Appendix B provides the first follow-up field test data collection instruments. The primary contractor to NCES for this study is RTI International (Contract # 919900-18-R0018).

A.1.b Legislative Authorization

HS&B:22 is the next in the series of high school longitudinal studies conducted by NCES in close consultation with other U.S. Department of Education offices, other federal agencies, and organizations. NCES is authorized to conduct this study by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543).

A.1.c Prior and Related Studies

NCES's secondary longitudinal studies program has produced some of the most prominent studies of high school education in the United States. The series of studies inaugurated with the National Longitudinal Study of 1972 (NLS-72) and was followed by the High School and Beyond 1980 (HS&B:80), the National Education Longitudinal Study of 1988 (NELS:88), the Education Longitudinal Study of 2002 (ELS:2002), and the High School Longitudinal Study of 2009 (HSL:09). These studies examine high school students and their long-term trajectories. HS&B:22 continues this series of longitudinal studies.

The NCES secondary longitudinal studies examine issues such as students' readiness for high school; the risk factors associated with dropping out of high school; high school completion; the transition into postsecondary education and access/choice of institution; the shift from school to work; and the pipeline into science, technology, engineering, and mathematics (STEM). They have informed education policy by tracking long-term trends and elucidating relationships among student, family, and school characteristics and experiences. They have also helped establish new methodologies, designs, and measures that have influenced the practice of education research. Understanding what factors propel some students to successful completion of high school and entry into work or postsecondary education while leaving others behind is a critical function of high school longitudinal studies such as HS&B:22. The HS&B:22 first follow-up field test will include surveys of students, parents, students' teachers, counselors, and administrators, plus a student assessment in mathematics.

A.2 Purposes and Uses of Data

HS&B:22 will culminate in a general-purpose dataset of nationally representative data related to students' transitions into and out of high school; academic achievement (especially in mathematics and reading); the influence of parents and the high school experience on student achievement and development; education equity; factors associated with dropping out of high school; and changes in education practices over time. By collecting data in the fall of grade 9 and the spring of grade 12, the study data may answer questions on numerous key issues, some of which are summarized here:

1. Transition into high school
 - a. Adjustment to high school, fall ninth grade experiences, and coursework
 - b. High school characteristics associated with continued achievement for high achievers or improvement for low achievers
2. Academic growth over time and student, family, and school correlates
3. High school experiences
 - a. Student mobility patterns and their effect on outcomes
 - b. Career and technical education opportunities
 - c. Prevalence and use of technology
 - d. Process of dropping out and student, family, and school characteristics associated with returning to school.
4. Transition out of high school
 - a. Students' postsecondary education and/or work plans and how those plans change over time and vary by student, family, and school characteristics.
 - b. Characteristics and experiences of students who plan to work, enter the military, or pursue activities other than postsecondary education.
 - c. Extent of students' knowledge and planning for postsecondary education by student, family, and school characteristics.

To address all the issues listed in this section, data will be collected from high school students and their parents, teachers, school counselors, and school administrators. The student and parent surveys will be available in English and Spanish. Students sampled in the first follow-up field test will participate in the following study components:

- The **mathematics assessment** will measure students' mathematics proficiency at the end of high school.
- The **student survey** is designed to provide information about the factors associated with student success. Topics such as student's attitudes, experiences, behaviors, and interactions will be covered to understand their influence on student performance and outcomes.

The base-year collection was conducted when sampled students were ninth graders and the first follow-up will occur when most students will be in grade 12, although some students may have already left high school at the time of data collection. Due to base-year data collection delays caused by the COVID-19 pandemic, the first follow-up field test will collect data from a new sample of twelfth-grade students in spring of the 2023-2024 school year (as described in section B.1). Because the first follow-up student sample will be comprised entirely of current twelfth-grade students, items pertaining to students no longer in school (e.g., dropouts, early graduates) will not be administered in the field test. Instead, the field test will focus on testing new items for potential inclusion in the first follow-up full-scale collection, such as reasons for taking or not taking arts and CTE courses, frequency of hearing negative remarks about others, student employment, and post-high school plans.

Parents will complete a survey about the student's home life and educational experiences. The math teachers of the students (or English Language Arts teacher, if the student did not take math in 12th grade) will complete a survey about their background, classroom practices, and support at the school. For the field test, teachers will also be asked to provide student-level information on one sampled student that they teach (in the full-scale data collection, teachers will be asked to provide information about each sampled student that they teach). A counselor at each school will complete a survey about counseling practices at the school. The administrator or principal at each school will complete a survey about policies and practices at the school. The three staff surveys will also include debriefing items, which will be used to gather feedback about the terminology used and how easy or difficult it is to complete the surveys.

A.3 Use of Information Technology

Technology will be used when feasible to reduce burden and improve efficiency and accuracy at all levels of the study. A brief study video, accessible via the Web, will be made available to help introduce the study, describe its importance, and demonstrate what participation will look like in schools. School districts and schools will be able to upload roster information and parent and teacher linkages to sampled students via the secure HS&B:22 website but will also be able to provide this information in any format convenient for them.

As used in the base-year, a mobile computer lab will be set up for the student session at each participating school

and the student session will be completed on tablet-like Chromebook computers with touchscreen capability and an attached keyboard. The computerized assessment is made possible by connecting the Chromebooks to an independent local area network (LAN) housed on a laptop computer set up at the school by study field staff. All equipment is provided by the study, and neither the school's internet access nor any internet access in general is required for the computerized administration of the student session.

For the first follow-up field test, schools may opt to use their own computers and Internet to complete the session with study staff present at the school. Prior to the session, study staff will confirm that students can access the school's Internet and the study website to participate in the web-based data collection. The website for data collection will reside on NCES' Secure Socket Layer (SSL) encrypted servers. On a nightly basis, the data collection contractor, RTI, will download interview data, in batches, to its Enhanced Security Network (ESN) via a secure web service. Once in the ESN, data will be cleaned and undergo quality analysis.

At schools that participate in the study but do not allow in-school data collection or for schools that are virtual and do not have a school building, students will participate in a self-administered data collection outside of school with the same security protocols for web-based data collection as described above.

A computer-based data management system, designed to facilitate tracking efforts, will be used to manage the sample using encrypted data transmission and networking technology to maintain timely information on respondents, including contact, tracking, and case completion data. This system will be particularly important as students move from one school to another over the course of the study.

A.4 Efforts to Identify Duplication

Since the inception of its secondary education longitudinal studies program in 1970, NCES has consulted with other federal offices to ensure that the data collected in this important series of longitudinal studies do not duplicate the information from any other national data sources within the U.S. Department of Education or other government agencies. In addition, NCES staff have regularly consulted with nonfederal associations such as the College Board, American Educational Research Association, the American Association of Community Colleges, and other groups to confirm that the data to be collected through this study series are not available from any other sources. These consultations and the HS&B:22 Technical Review Panel (TRP) also provide methodological insights from the results of other studies of secondary and postsecondary students and labor force members, and they ensure that the data collected through HS&B:22 will meet the needs of the federal government and other interested agencies and organizations. Other longitudinal studies of secondary and postsecondary students (i.e., NLS:72, HS&B, NELS:88, ELS:2002, HSLs:09) have been conducted by NCES in the past and, in addition to providing contemporary data, HS&B:22 builds on and extends these studies rather than duplicating them.

The only other dataset that offers so large an opportunity to understand the key transitions into postsecondary institutions or the world of work are the National Longitudinal Survey of Youth 1979 and 1997 cohorts (NLSY79, NLSY97) conducted by the Department of Labor (Bureau of Labor Statistics). However, the NLSY youth cohorts represent temporally earlier cohorts than HS&B:22. There are also important design differences between NLSY79/ NLSY97 and HS&B:22 that render them more complementary than duplicative. NLSY is a household-based longitudinal survey, while HS&B:22 is school based. For both NLSY cohorts, Base Armed Service Vocational Aptitude Battery (ASVAB) test data are available, but there are no longitudinal high school achievement measures. Although NLSY97 also gathers information from schools (including principal and teacher reports and high school transcripts), it cannot study school processes in the same way as HS&B:22, given its household sampling basis. Any given school contains only one to a handful of NLSY97 sample members, a number that constitutes neither a representative sample of students in the school nor a sufficient number to provide within-school estimates. Thus, although both studies provide important information for understanding the transition from high school to the labor market, HS&B:22 is uniquely able to provide information about education processes and within-school dynamics and how these affects both school achievement and ultimate labor market outcomes.

A.5 Methods Used to Minimize Burden on Small Businesses

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

A.6 Frequency of Data Collection

The NCES high school longitudinal cohort studies have been conducted each decade since 1972. The most recent high school cohort, HSLS:09, consisted of fall 2009 ninth graders – 13 years prior to the HS&B:22 ninth-grade cohort. HS&B:22 will follow a nationally representative sample of ninth-grade students from the start of high school in the fall of 2022 to the spring of 2026 when most will be in twelfth grade. The sample will be freshened in 2026 to create a nationally representative sample of twelfth graders. A high school transcript collection and additional data collection follow-ups beyond high school are also planned. The field test took place two years prior to the BYFS data collection, with a data collection of students in grades 9 and 12 in the fall of 2019. A new sample of twelfth-grade students will be drawn from participating base-year field test schools to test the first follow-up instruments in 2024. No follow-up will be conducted with twelfth-grade students participating in the spring 2024 field test.

A.7 Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

A.8 Consultations Outside the Agency

Content experts have been consulted in the development of the assessments and questionnaires. Technical Review Panel (TRP) meetings were held in October 2021 and December 2022 to inform the HS&B:22 first follow-up field test survey design, and the November 2018 and March 2020 HS&B:22 mathematics content review panel (CRP) meetings informed the mathematics assessment. The following are the members of the HS&B:22 TRP and CRP, respectively:

Technical Review Panel Members		Content Review Panel Members	
Tolani Britton	University of California, Berkeley	Heather Brown	Illinois State Board of Education, Chicago, IL
Blaire Cholewa	University of Virginia	David Bressoud	Macalester College, St. Paul, MN
Adam Gamoran	William T. Grant Foundation	Gail Burrill	Michigan State University, East Lansing, MI
Odis Johnson, Jr.	Johns Hopkins University	Paul Rodriguez	Troy High School, Fullerton, CA
Amy Langenkamp	University of Notre Dame		
Chandra Muller	University of Texas at Austin		
Kent Phillippe	American Association of Community Colleges		
Jay Plasman	The Ohio State University		
Natasha Quadlin	UCLA		
Brian Rowan	University of Michigan		
Ming Te-Wang	University of Pittsburgh		

A.9 Provision of Payments or Gifts to Respondents

High levels of school participation are critical to the success of each phase of the study. School administrator, teacher, guidance counselor, parent, and student data collection activities are contingent on school cooperation. NCES recognizes that the burden level of the study is one of the factors that school administrators will consider

when deciding whether to participate. Given the real and perceived burden of participation, NCES will continue to use strategies that have worked successfully in other NCES studies (e.g., HSLS:09, MGLS:2017, and ECLS-K:2011), including offering both monetary and nonmonetary incentives to respondents during recruitment. Recent experience on MGLS:2017 showed that no single incentive speaks to all schools, students, parents, or school staff. A menu of options will be presented to school districts, schools, and sample members to allow each entity to determine the most effective incentive to facilitate participation in the study. Table 1 summarizes the incentive planned for each respondent type and instrument/activity along with their estimated burden times and a brief justification.

The student and parent instruments have abbreviated versions that are available if absolutely necessary as a last resort for refusal conversion. The decision to offer the abbreviated option will be based on evaluation of response rates throughout data collection. The full-scale collection will also include abbreviated instruments for the staff surveys, but abbreviated staff instruments will not be offered in the field test.

Students

During school recruitment, HS&B:22 staff will discuss with the school which of the following incentives can be offered to students to encourage their participation: a gift card, admission to a school athletic or arts event, credit for the school cafeteria or store, item from the school store, donation to the school, movie ticket, portable charger, or ear buds. Schools are varied in what they may permit for the student incentive. For example, some recommend a monetary or gift card incentive to secure cooperation from students, while others do not allow monetary or gift card incentives. Some schools may be more likely to participate if we offer items that directly benefit the school (e.g., admission to a school event, credit to the school cafeteria or store, or school donation). This will be negotiated with the school at the time of recruitment and only the options the school approves will be offered to students. Each option will have an approximate value of \$10.

Students will participate in a 90-minute session¹ in their school or virtually for an out-of-school administration. Five minutes are built in to the 90-minute session for introductory and assent purposes. Upon completion of the session, students will be offered to select one from all the incentives listed above (excluding any options not approved by their school). In addition, students will receive a certificate for 2 hours of community service from the U.S. Department of Education. To incentivize return of the parental consent form by students at schools requiring explicit consent, students will be offered a choice of a food event sponsored by the study (e.g., pizza, bagels, etc.) or a \$3 voucher for the school cafeteria. This choice allows the schools an option for those who perceive the food event to be disruptive, allows the voucher to be distributed immediately upon the return of the permission form, and covers the cost of one school lunch².

Table 1. HS&B:22 First Follow-up Field Test Instruments, Burden Time and Incentive Amounts

Instrument/Activity	Burden Time ¹	First Follow-up field test (F1FT) Incentives
Student return of parent consent forms (explicit consent schools only)	10 minutes	Choice of Food event at school (e.g., pizza, bagels, etc.) sponsored by the study or \$3 voucher for school cafeteria
Student Assessment and Survey - In-school administration	90 minutes	Approximately \$10 value options such as a gift card, admission to a school athletic or arts event, credit for the school cafeteria or store, item from the school store, donation to the school, movie ticket, portable charger, or ear buds. Certificate for 2 hours of community service from the U.S. Department of Education
Student Assessment and Survey - Out-of-school administration	90 minutes	\$10 for the assessment plus \$15 for the survey (check, gift card, or cash). Alternatively, the study will offer options with a value commensurate to the completion status (assessment, survey, or both) in the form of admission to a school athletic or arts event, credit for the school cafeteria or store, item

¹ All communication materials will state 90-minute student session, even if the session ends up slightly shorter. Our aim is to ensure schools are willing to participate for a duration of 90 minutes to simulate the request we will make in the full-scale study.

² Reported by the National School Nutrition Association
<https://schoolnutrition.org/aboutschoolmeals/schoolmealtrendsstats/>

Instrument/Activity	Burden Time ¹	First Follow-up field test (F1FT) Incentives
		from the school store, donation to the school, movie ticket, portable charger, or ear buds. Certificate for 2 hours of community service from the U.S. Department of Education
Parent Survey	25 minutes ²	\$1 prepaid incentive Up to \$40 in cash, check, or gift card upon survey completion (for a maximum total of \$41).
Teacher - Teacher Survey - Classroom Survey - Teacher Student Report (one student)	25 minutes	\$30 (check or gift card) or another option such as classroom supplies with equivalent value. Continuing education certificate ³
School Counselor	25 minutes	\$25 (check or gift card)
School Administrator	40 minutes	\$25 (check or gift card)
School Participation School Coordinator (logistics, on-site visit, consent forms, administrative records, etc.)	6 hours to provide roster from administrative records 2 hours to schedule and assist with assessments 6 hours for consent assistance 2 hours to coordinate session logistics	\$200 or other options with equivalent value for the school, such as school supplies, materials for the school library, registration for a conference, continuing education credit for staff ² , data training or related data support, etc. Staff at participating schools will be invited to participate in an interactive webinar on STEM or Project-Based Learning. \$150 for school coordinator (\$50 for providing the roster list and \$100 after data collection is complete)

¹ Please see corresponding text below for an explanation of the time variance for a particular instrument.

² Includes the maximum possible burden if all respondents elect to complete the full instrument.

³ The mechanism for providing continuing education credits varies by state and district. We will provide a certificate of participation to participating school staff which some states and districts will accept as continuing education credits.

Parents

Parent survey response rates have declined over the past decade. The ECLS-K:2011 baseline (fall 2010) parent survey response rate was more than 10 percentage points lower (74 percent)³ than the parent survey response rate in the corresponding 1998 wave of the ECLS-K (85 percent).⁴ The ninth-grade parent survey response rate for the HSLs:09 baseline was 68 percent.⁵, and the preliminary response rate for HS&B:22 BYFS was approximately 29 percent.

To increase parent response for F1FT, we will offer a 5-minute “micro” survey to some parents which will include a small subset of items that are of critical analytic importance. Parents who complete the micro survey will be given the option to continue with the parent survey completing the rest of the instrument. We will assess the effectiveness of the 5-minute micro survey offer as (1) a method of obtaining critical data items, and (2) a “foot in the door” opportunity, after which parents choose to complete the full instrument. Incentive amounts will vary based on the version of the instrument completed, and all parents will be eligible to receive the same maximum incentive amount (up to \$41) for completing the full 25-minute instrument. Additional details about the parent micro survey experiment are included in section B.4.

Teachers

³ Tourangeau, K., Nord, C., Lê, T., Sorongon, A.G., Hagedorn, M.C., Daly, P., and Najarian, M. (2012). *Early Childhood Longitudinal Study, Kindergarten Class of 2010-11 (ECLS-K:2011), User's Manual for the ECLS-K:2011 Kindergarten Data File and Electronic Codebook* (NCES 2013-061). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

⁴ Tourangeau, K., Nord, C., Lê, T., Sorongon, A.G., Hagedorn, M.C., Daly, P., and Najarian, M. (2001). *Early Childhood Longitudinal Study, Kindergarten Class of 1998-99 (ECLS-K), User's Manual for the ECLS-K Base-year Public-Use Data Files and Electronic Codebook* (NCES 2001-029). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

⁵ Ingels, S.J., Pratt, D.J., Herget, D.R., Burns, L.J., Dever, J.A., Ottem, R., Rogers, J.E., Jin, Y., and Leinwand, S. (2011). *High School Longitudinal Study of 2009 (HSLs:09). Base-year Data File Documentation* (NCES 2011-328). U.S. Department of Education. Washington, DC: National Center for Education Statistics.

Mathematics teachers (English Language Arts teachers for students not taking math) will be asked to complete a survey consisting of three components: a teacher component, a classroom component, and a teacher-student report (TSR) component. We anticipate the teacher survey to take 25 minutes and we will offer a \$30 incentive for their time. In the full-scale collection, when teachers will be asked to provide information about multiple sampled students, the incentive will include a base amount plus an additional amount per student. A monetary incentive in the form of a check or gift card will be offered unless the school does not permit the teacher to receive a monetary incentive, in which case the teacher will be offered a nonmonetary, value-equivalent incentive.

School Counselors and School Administrators

School administrator and school counselor data are critical to the success of the study and each of the administrator and counselor survey responses provides valuable contextual information for each sampled student at the school. As in the full-scale, we will offer \$25 in the form of a check or gift card to the school administrator completing the school administrator survey, and \$25 in the form of a check or gift card to the counselor completing the counselor survey. This incentive is equivalent to the school administrator incentive on ECLS-K:2011 and MGLS:2017. This incentive will help offset declining administrator response rates (HSLs:09 achieved about 94 percent response compared to about 77 percent achieved in the base year of MGLS:2017).

Schools

School recruitment is increasingly challenging. Schools, and districts on behalf of schools, often cite burden on students and school staff, lack of direct benefit, over-testing, and loss of instructional time as reasons not to participate in voluntary studies. For F1FT, all schools will be offered a baseline incentive of \$200 in the form of either a check or a cash equivalent such as school supplies to encourage participation in HS&B:22. There will not be an increased incentive boost for F1FT participating schools.

Staff from participating schools will be invited to participate in an interactive webinar on project-based learning or STEM.

School Coordinators

School coordinators will be offered a \$150 monetary incentive, as has been done in studies such as MGLS:2017, HSLs:09, and HS&B:22 full-scale. School coordinators play an especially important role in the study and are critical to its success. The coordinator in each participating school will spend a total of about 16 hours to coordinate logistics with RTI (~2 hrs.); compile and supply a roster of eligible students for sampling from administrative records (~6 hrs.); communicate with teachers, students, and parents about the study to encourage their participation and distribute and collect parental consent forms (~6 hrs.); and assist the session facilitator in ensuring that the sampled students attend the student sessions (~2 hrs.). School coordinators will receive \$50 upon receipt of the student roster and the remaining \$100 after all data collection activities have been completed at the school. We designed this split in the incentive because of the high burden associated with the roster collection. The incentive protocol for school coordinators is expected to be the same for the first follow-up full-scale.

A.10 Assurance of Confidentiality

Confidentiality and data security protection procedures have been put in place for HS&B:22 to ensure that the contractor and its subcontractors comply with all privacy requirements, including:

1. The Statement of Work of the HS&B:22 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 HS&B:22 procedures for maintaining confidentiality include notarized nondisclosure affidavits obtained from all personnel who will have access to individual identifiers; personnel training regarding the meaning of confidentiality; controlled and protected access to computer files; built-in safeguards concerning status monitoring and receipt control systems; and a secure, staffed, in-house computing facility. HS&B:22 follows detailed guidelines for securing sensitive project data, including, but not limited to: physical/environment protections, building access controls, system access controls, system login restrictions, user identification and authorization procedures, encryption, and project file storage/archiving/destruction.

Additionally, the contractor will take security measures to protect the web data collection application from unauthorized access. The web server will include an SSL certificate and will be configured to force encrypted data transmission over the Internet. All files uploaded to the website will be stored in a secure project folder that is accessible and visible to authorized project staff only. A number of security procedures are in place for users to access restricted pages containing confidential information:

1. When a primary school coordinator is assigned to the study, the assignment comes from the school principal or district research department. The school coordinator is assigned a unique ID number and password, and using two-factor authentication.
2. Through the website, the primary coordinators at the school 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 school.
3. HS&B:22 staff will verify the employment status of the new user assigned by the primary coordinator prior to creating the account and allowing access using two-factor authentication. Employment status is verified through a web search, a public directory, and/or contacting the school or district’s administration.

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

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

NCES assures schools and individuals participating in HS&B:22 that all of the data provided by schools, staff, parents, and students may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151). The laws pertaining to the collection and use of personally identifiable information will be clearly communicated in correspondence with states, districts, schools, teachers, students, and parents. Letters and informational materials will be sent to parents and school administrators describing the study, its voluntary nature, and the extent to which respondents and their responses will be kept confidential. This information will also be included in any research applications required by school districts. A list of ninth-grade students will be requested from school districts and/or schools under the FERPA exception to the general consent requirement that permits disclosures to authorized representatives of the Secretary for the purpose of evaluating Federally supported education programs (34 CFR §§ 99.31(a)(3)(iii) and 99.35). This information will be securely destroyed when no longer needed for the purposes specified in 34 CFR §99.35.

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

NCES is authorized to conduct the High School and Beyond 2022 (HS&B:22) by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543) and to collect students' education records from education agencies or institutions for the purposes of evaluating federally supported education programs under the Family Educational Rights and Privacy Act (FERPA, 34 CFR §§ 99.31(a)(3)(iii) and 99.35). The data are being collected for NCES by RTI International, a U.S.-based nonprofit research organization. All of the information [*respondent type*] provide may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151). The collected information will be combined across respondents to produce statistical reports.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this voluntary information collection is 1850-0944. Approval expires xx/xx/20xx. The time required to complete this information collection is estimated to average approximately [x] minutes per response, including the time to review instructions, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this information collection, or any comments or concerns regarding the status of your individual submission, please write directly to: The High School and Beyond 2022 (HS&B:22), National Center for Education Statistics, PCP, 550 12th St., SW, 4th floor, Washington, DC 20202.

FERPA (34 CFR Part 99) allows the disclosure of personally identifiable information from students' education records without prior consent for the purposes of HS&B:22 according to the following excerpts: 34 CFR §99.31 asks, "Under what conditions is prior consent not required to disclose information?" and explains in 34 CFR §99.31(a) that "An educational agency or institution may disclose personally identifiable information from an education record of a student without the consent required by §99.30 if the disclosure meets one or more" of several conditions. These conditions include, at 34 CFR §99.31(a)(3):

The disclosure is, subject to the requirements of §99.35, to authorized representatives of--

- (i) *The Comptroller General of the United States;*
- (ii) *The Attorney General of the United States;*
- (iii) *The Secretary; or*
- (iv) *State and local educational authorities.*

HS&B:22 is collecting data under the Secretary's authority. Specifically, NCES, as an authorized representative of the Secretary of Education, is collecting this information for the purpose of evaluating a federally supported education program. Any personally identifiable information is collected with adherence to the security protocol detailed in 34 CFR §99.35:

- (a)(1) *Authorized representatives of the officials or agencies headed by officials listed in §99.31(a)(3) may have access to education records in connection with an audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs.*
- (2) *The State or local educational authority or agency headed by an official listed in §99.31(a)(3) is responsible for using reasonable methods to ensure to the greatest extent practicable that any entity or individual designated as its authorized representative—*
 - (i) *Uses personally identifiable information only to carry out an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements related to these programs;*

(ii) Protects the personally identifiable information from further disclosures or other uses, except as authorized in paragraph (b)(1) of this section; and

(iii) Destroys the personally identifiable information in accordance with the requirements of paragraphs (b) and (c) of this section.

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

(1) Be protected in a manner that does not permit personal identification of individuals by anyone other than the State or local educational authority or agency headed by an official listed in §99.31(a)(3) and their authorized representatives, except that the State or local educational authority or agency headed by an official listed in §99.31(a)(3) may make further disclosures of personally identifiable information from education records on behalf of the educational agency or institution in accordance with the requirements of §99.33(b); and

(2) Be destroyed when no longer needed for the purposes listed in paragraph (a) of this section.

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

(1) The parent or eligible student has given written consent for the disclosure under §99.30; or

(2) The collection of personally identifiable information is specifically authorized by Federal law.

Additionally, the study qualifies for a 45 CFR Part 46 waiver of consent based on the following factors:

- There is minimal risk to the participants. There is no physical risk and only minimal risk associated with linkage of data to sample members. Data will undergo disclosure avoidance analysis and disclosure treatment steps to further reduce the risk.
- The waiver will not affect the rights and welfare of the subjects. The voluntary nature of the study is emphasized to sample members. Public-use and restricted-use data are only used for research purposes and lack direct individually-identifying information. The data are further protected through disclosure avoidance procedures approved by the NCES Disclosure Review Board.
- Whenever appropriate, subjects will be provided with additional pertinent information after they have participated. For each round of the study, information about prior rounds and the nature of the study is made available to sample members.
- The study cannot be conducted practicably without the waiver. To obtain written consent from sample members, multiple forms would have to be sent to the sample members with multiple follow-up telephone and in-person visits. This process would add weeks to the data collection process and is not feasible from a time and imposed participant burden standpoint. Additionally, the value of these data would be jeopardized from a nonresponse bias perspective.
- The potential knowledge from the study is important enough to justify the waiver. HS&B:22 will provide invaluable data to researchers and education policy makers about the progress and experiences of high school students, their transitions to postsecondary education and work, their family and school environments, and their high-school and post-high-school outcomes.

A.11 Sensitive Questions

HS&B:22 is a voluntary study in which no person is required to respond, and respondents may decline to answer any item. The voluntary nature of the study is addressed in all contact materials and in the training of all project staff, field staff, and telephone interviewers. Some topics may be deemed sensitive for some respondents.

Schools. Schools (or school districts on behalf of schools) will be asked to provide rosters of all students in grade 12 in F1FT. Schools may have concerns about providing this information without first obtaining permission from the parents to do so. The disclosure is permitted under FERPA's exception to the general consent requirement that permits disclosures to authorized representatives of the Secretary for purposes of evaluating Federally supported education programs (34 CFR §§ 99.31(a)(3)(iii) and 99.35). This information will be securely destroyed when no longer needed for the purposes specified in 34 CFR §99.35. All district and school personnel facilitating the conduct of HS&B:22 and the development of the student sampling frame will be informed of the privacy and confidentiality protocols required for HS&B:22, including those having to do with the sample lists of schools and students. The collection of these data is necessary for developing the student sample.

School Administrator and Guidance Counselor. School administrators and the lead counselor for grade 12 from all F1FT schools will be asked to complete a survey, respectively. The items in the School Administrator

Questionnaire and the Counselor Questionnaire are not of a sensitive nature and should not pose sensitivity concerns to respondents.

Teacher. One teacher (math or English Language Arts) of each sampled student in each participating F1FT school will be asked to complete a survey. The information collected in the TSR could be regarded as sensitive because the teacher is asked to provide information about a student's academic skills, classroom behavior, and IEP/ISP status.

Parent. One parent of each sampled student will be asked to complete a survey. To achieve the study's primary goal of describing the development, academic outcomes, and characteristics of twelfth-grade students, we will be asking parents some questions that could be viewed as sensitive in nature by some respondents. The parent survey includes questions about whether there is a parent living outside the home and their involvement with the twelfth-grade student's education, disciplinary actions received by the student, perceptions of discrimination, systemic racism, and school discipline practices, whether the student has ever dropped out of high school, parent's race and ethnicity, the primary language spoken at home, economic insecurity, the student's IEP/ISP status, the student's health and disabilities, experiences related to the COVID-19 pandemic, and contact information. These types of questions have been asked in many large-scale studies of school-age children including ELS:2002, HSLs:09, and MGLS:2017. They provide important information about the student's home life and educational experiences that may affect long-term outcomes. The contact information is necessary to allow the sample members to be located for future follow-up. Respondents are informed that they may choose not to answer any question they prefer to skip.

Student. Students will complete a questionnaire which includes a few questions that could be sensitive for some students, such as questions about perceptions of belonging based on race and ethnicity, pervasiveness of negative remarks about others, perceptions of school safety, dropping out of school, student employment, negative impacts of the COVID-19 pandemic, and to self-report their race/ethnicity and sex, which could be sensitive questions for students at this age. Students are also asked for contact information so that they may be located in the future for follow-ups. The questions that are included in the student survey have been asked in other studies of adolescents and the responses to these questions have been found to help explain why some students are more likely to continue their education after high school, attain higher educational credentials, and have better employment outcomes.

Respondents are informed that they may choose not to answer any question they prefer to skip. There may be situations in which questions on certain topics cannot be administered to students due to district policies or state or local laws. If this situation arises, the school recruitment team will work with the district to gather information about the restrictions and negotiate a solution. It is possible that students in these districts will be routed past a subset of instrument questions, as determined in negotiations with the district on a case-by-case basis.

A.12 Estimates of Response Burden

Burden estimates for all activities associated with F1FT recruitment and data collection are shown in Table 2. For F1FT recruitment, the total burden time for participating school districts, estimated at 260 minutes, includes time to have discussions internal to the district and possibly the school board about district participation, as well as conversations with RTI recruitment staff. The total response burden estimate for district IRB approvals (in the special handling districts that require completion of a research application before they will allow schools under their jurisdiction to participate in a study) is based on an estimated 120 minutes for IRB staff review and approval and 120 minutes per panelist for approval by the district's IRB panel, which is estimated to average 5 panelists. The total burden time for participating schools, estimated at 260 minutes, includes time to discuss participation with the RTI recruiter, with staff internally, and with the school district as well as to appoint a coordinator and assist the school coordinator with data collection preparations. The school coordinator total burden time is estimated at 16 hours and includes an estimated 6 hours to prepare the student roster and an estimated 10 hours to coordinate the logistics and distribute and track parent permission forms. In the F1FT, approximately 40 grade 12 students per participating school will be randomly selected. Parents of sampled students are estimated to spend about 10 minutes to read the study materials that will be provided and, if appropriate, sign the permission form either in hard copy or electronically.

Table 2. HS&B:22 First Follow-up Field Test Recruitment and Data Collection Burden Estimates

HS&B:22 Activity	Sample Size	Expected Response Rate**	Number of Respondents	Number of Responses	Average Burden Time per Response (minutes)	Total Burden (hours)	Estimated Respondent Average Hourly Wage ¹	Estimated Respondent Burden Time Cost
First Follow-up Field Test Recruitment								
Nonparticipating districts	54	20%	11	11	20	4	\$51.29	\$205
Participating districts		80%	43	43	260	187	\$51.29	\$9,592
District IRB staff study approval	16	100%	16	16	120	32	\$51.29	\$1,642
District IRB panel study approval ²	80 ²	100%	80	80	120	160	\$51.29	\$8,207
Nonparticipating eligible schools	70	14.3%	10	10	20	4	\$51.29	\$205
Participating schools (in-school)		78.6%	55	55	260 ³	239	\$51.29	\$12,259
Participating schools (out of school only)		7.1%	5	5	260 ³	22	\$51.29	\$1,129
School Coordinators (data collection assistance) ⁴	60	100%	60	60	600	600	\$33.40	\$20,040
School Coordinators (enrollment status)		100%	60 ⁵	60	360	360	\$33.40	\$12,024
School Coordinators (roster data)		100%	60 ⁵	60	360	360	\$33.40	\$12,024
Students' parents (tracking)	2,626	30%	788	788	10	132	\$29.76	\$3,929
Students' parents (permission)	2,100	95%	1,995	1,995	10	333	\$29.76	\$9,910
Total F1FT Recruitment			3,063	3,183		2,433		91,166
First Follow-up Field Test (F1FT) Data Collection								
<i>Students and Parents</i>								
Student Survey	2,100	76%	1,596	1,596	30	798	\$7.25	\$5,786
Student Math Assessment	2,100 ⁵	76%	1,596 ⁵	1,596	40	1,064	-	-
Students' parents	2,100	80%	1,680	1,680	25 ⁶	700	\$29.76	\$20,832
<i>Students' teacher</i>								
Teacher survey	240	85%	204	204	25 ⁷	85	\$33.40	\$2,839
<i>School counselors</i>								
Students' school counselors	60	85%	51	51	25	22	\$30.87	\$679
<i>School administrators</i>								
Students' school administrators	60	85%	51	51	40	34	\$51.29	\$1,744
Total F1FT Data Collection	-	-	3,582	5,178	-	1,639	-	\$31,880
Overall Total			6,645	8,361		4,072		\$123,046

¹ The average hourly earnings of parents derived from May 2022 Bureau of Labor Statistics (BLS) Occupation Employment Statistics is \$29.76 of high school teachers is \$33.40 of education administrators is \$51.29, and of educational guidance counselors is \$30.87. If mean hourly wage was not provided, it was computed assuming 2,080 hours per year. The exception is the student wage, which is based on the federal minimum wage. Source: BLS Occupation Employment Statistics, <http://data.bls.gov/oes/>; datatype: Occupation codes: All employees (00-0000); High school teachers (25-2031); Education Administrators (11-9032); and Educational guidance counselors (21-1012); accessed on May 11, 2023.

² Based on the estimate that on average there will five individuals per panel.

³ Based on the estimate that on average schools will incur the same burden time to review study request, decide whether or not to participate, appoint a coordinator, and assist with the preparations for data collection regardless of the student session location.

⁴ Based on the estimate that on average it will take about 10 hours to distribute and collect parental permission forms, and schedule and coordinate data collection logistics.

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

⁶ Includes the maximum possible burden if all respondents elect to complete the full instrument.

⁷ Includes time to complete the three survey components: the teacher component, the classroom component, and the teacher-student component for one student.

** The table depicts predetermined sample size and anticipated respondent yield. The response rate percentages may not sum to 100 due to rounding.

A.13 Estimates of Total Annual Cost Burden

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

A.14 Costs to Federal Government

A summary of estimated costs to the federal government for HS&B:22 is shown in Table 3. Cost estimates include staff time, shipments, reproduction, postage, and telephone costs associated with the study management, data

collection, analysis, and reporting. The total cost for the HS&B:22 base-year full-scale and first follow-up field test⁶ is \$23,253,168, for an average annual cost to the federal government of \$3,827,028.

Table 3. Costs to NCES for HS&B:22

Base-Year Full-Scale (BYFS)	
NCES salaries and expenses	\$187,500
Contract costs	\$19,355,829
<i>Instrumentation and materials</i>	\$1,093,613
<i>Data Collection</i>	\$14,105,699
<i>Systems and data processing</i>	\$4,156,517
First Follow-up Field Test (F1FT)	
Contract costs	\$3,712,839
<i>Instrumentation and materials</i>	\$1,093,613
<i>Data Collection</i>	\$1,688,493
<i>Systems and data processing</i>	\$930,733
Total	\$23,256,168

A.15 Reasons for Program Changes or Adjustments

The apparent reduction in respondent burden is due to the fact that the last clearance was for base-year full-scale recruitment and data collection activities along with sampling, recruitment, and data collection for the first follow-up field test. This request includes first follow-up field test sampling and recruitment which were previously approved as well as the F1FT data collection. This results in a program change reduction in burden and responses of -49,858 hours and -120,117 responses. The total burden and responses is 4,072 hours and 8,361 responses.

A.16 Publication Plans and Time Schedule

The operational schedule for HS&B:22 is shown in Table 4. The contract for HS&B:22 requires multiple reports, publications, and other public information releases. Results of the field test will be published as a report and appended to the full-scale data file documentation. In addition, the following will be produced from the full-scale data:

- Descriptive summaries of significant findings for dissemination to a broad audience (including First Look reports);
- Detailed data file documentation describing all aspects of the full-scale study design and data collection procedures, including an appendix summarizing the methodological findings from the field test;
- A comprehensive psychometric report describing the development and implementation of the assessments; and
- Complete data files and documentation for research data users in the form of both a restricted-use data (RUD) file and public-use file; DataLab – a public-use data analysis system in which users create their own tables and charts using pre-defined categories from a subset of variables or users can create their own tables and charts using all of the variables, in addition to conducting regression analyses.

Table 4. Operational schedule for HS&B:22

Activity	Start date	End date
Base-year full-scale study (BYFS)		
Select school sample	January 2019	May 2021
Recruitment of schools and districts	August 2019 ¹	March 2023
Recruitment of students and parents through requesting parent consent	August 2022	February 2023
Data collection	September 2022	April 2023
Process data, construct data files	September 2022	April 2024
Prepare/update reports	April 2023	April 2024
First follow-up field test (F1FT)		

Activity	Start date	End date
Track student sample	January 2022	May 2022
Collect student enrollment information	December 2022	May 2023
Recruit schools	April 2023	April 2024
Select 12 th grade sample	August 2023	February 2024
Recruitment of students and parents through requesting parent consent	December 2023	May 2024
Data collection	January 2024	May 2024
Prepare field test report	June 2024	January 2025
First follow-up full-scale (F1FS)		
Track student sample	January 2025	May 2025
Collect student enrollment information and 12 th grade rosters	August 2025	March 2026
Recruit schools	March 2025	February 2026
Freshen student sample	August 2025	March 2026
Recruitment of students and parents through requesting parent consent	December 2025	May 2026
Data collection	January 2026	June 2026
Process data, construct data files	February 2026	July 2027
Prepare reports	July 2026	July 2027

¹ Recruitment began for the base-year full-scale in August 2019, prior to the study delay. The study was then delayed by two years due to the COVID-19 pandemic.

A.17 Approval to Not Display Expiration Date for OMB Approval

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

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

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