

High School and Beyond 2022 (HS&B:22)
First Follow-up Full Scale Sampling, Tracking, and
Recruitment

OMB# 1850-0944 v.11

Supporting Statement Part A

Submitted by
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A. Justification

A.1 Circumstances Making Collection of Information Necessary

A.1.a Purpose of this Submission

The High School and Beyond 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 2022-23 school year to the 2025-26 school year when most will be in twelfth grade. The student sample will be refreshed to create a nationally representative sample of twelfth-grade students. Additional students will be added to the HS&B:22 student sample by recruiting some base-year non-participating schools for the first follow-up full scale (F1FS), selecting a sample of 12th grade students, and adding those sampled students who were enrolled in 9th grade at the school in 2022-23 to the HS&B:22 student sample. A high school transcript collection and additional follow-up data collections beyond high school are also planned.

The base-year data collection was conducted in the 2022-23 school year with 9th grade students, and the first follow-up full scale (F1FS) is planned to take place in the 2025-26 school year, the modal sample's senior year. This submission is for sampling, tracking, and recruitment for HS&B:22 F1FS. OMB provided approval for the first follow-up field test (F1FT) sampling, tracking, and recruitment in March 2021 (OMB# 1850-0944 v.9,) and F1FT data collection in July 2023 (OMB#10850-09). This version includes updates from those approvals and incorporates lessons learned from the F1FT. Approval for the F1FS study instruments and data collection will be requested in a separate submission in 2025.

Part A of this submission presents information on the basic design of HS&B:22. Part B discusses the statistical methods employed. Appendix A provides the communication materials to be used during state, school district, school, and student recruitment activities. 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 (HSLs: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 full-scale data collection 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 grade 9 and as students begin to exit high school in 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, 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. For F1FS, students will participate in the following study components: student survey and mathematics assessment.

Parents will complete a survey about the student's home life and educational experiences. Math teachers of the students (or another 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. Teachers will also be asked to provide student-level information about each sampled student they teach. A counselor at each school will complete a survey about counseling practices at the school. The administrator or principal at each school will complete a survey about policies and practices at the school.

A.3 Use of Information Technology

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

During the F1FT, schools could choose to use their own devices and Internet for the student in-school data collection session; 50 schools out of 74 participating schools elected this option. For F1FS, schools will choose to use their own devices, or study-provided Chromebooks. For in-school data collection, students will access the web-based student session via the school's network or a study-provided enterprise router.

For F1FS, study staff will be present at the school regardless of the devices and Internet access used for the student session. Prior to the session, study staff will confirm that students can access the study website via the school's network or the study-provided enterprise router 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 FIPS-moderate secure network, 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. Students that are no longer attending high school will also be invited to participate in this manner.

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:80, 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 these NLSY cohorts, Base Armed Service Vocational Aptitude Battery (ASVAB) test data are available, but there are no longitudinal high school achievement measures. The NLSY 2027 (NLSY27) cohort, building on the foundation of NLSY97, will not use the ASVAB and will include new modules to capture the youth's physical and mental health assessments. The updated NLSY27 youth questionnaire aims to provide a comprehensive view of the youth's engagement in employment, school, work, and other activities, with a design that supports self-administration in future surveys. Although both NLSY and HS&B:22 studies provide important information for understanding the transition from high school to the labor market, HS&B:22 is uniquely able to provide detailed information about education processes and within-school dynamics and their impact on school achievement and 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 prior to HS&B:22, HSLs:09, consisted of fall 2009 ninth graders – 13 years prior to the HS&B:22 ninth-grade cohort. HS&B:22 is following a nationally representative sample of ninth-grade students from the start of high school in the 2022-23 school year to the 2025-26 school year when most will be in twelfth grade. At schools that participated in BYFS, the student sample will be freshened to create a nationally representative sample of 2025-26 twelfth-grade students as well. No new schools will be added to the sample. A high school transcript collection and additional data collection follow-ups beyond high school are also planned.

A.7 Special Circumstances of Data Collection

In March 2024, the Office of Management and Budget (OMB) announced revisions to Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15) and published the revised SPD15 standard in the Federal Register (89 FR 22182). Per the March 2024 updated Statistical Policy Directive No. 15, agencies are required to collect detailed race and ethnicity categories unless an exemption is sought. NCES is currently working on its action plan for compliance with the newly revised SPD 15 standards, and early discussions suggest that implementation of these standards will be particularly complex and delicate in data collections where race and ethnicity data is reported both by individuals about themselves and also provided by third parties (e.g., school administrators about their teachers, teachers about their students). HS&B is one such data collection.

This submission is for sampling, tracking, and recruitment for HS&B:22 F1FS, a follow-up study for the study cohort who begin high school (9th grade) in 2022. The majority of those students will be seniors (12th grade) in the 2025-26 school year. In addition, schools that are already participating in HS&B:22 will be asked to provide rosters of all students in grade 12 in F1FS for sample freshening so that a nationally representative sample of students are selected.

For proxy aggregate reports of race/ethnicity, specifically those by school administrators who will likely have access only to student race/ethnicity information collected under the old standards and held in student rosters, HS&B will continue to use race and ethnicity categories as described in the 1997 SPD 15 and as administered in prior HS&B collections, per an agreement between NCES senior leadership and OMB. Please see Appendix A.17 for an illustration of the roster upload tool used for student recruitment. Because these reports are aggregate by schools, NCES is reliant on the ability of those third-party record keepers to report their data in compliance with SPD 15 and it is not yet expected that schools will be able to reliably report these data using the 2024 SPD 15 revision.

Although NCES is not currently requesting clearance for the F1FS study instruments and data collection (these will be requested in a separate submission in 2025), we have established tentative plans for how we will collect race and ethnicity data from students and parents in that data collection. To collect self-reported race/ethnicity from student respondents (12th graders) and parent respondents, HS&B:22 F1FS plans to use Figure 1 of the Standard. To collect the race/ethnicity data from the parent respondent about a coparent or other adult in the household (Parent2), HS&B:22 F1FS plans to use Figure 2 of the Standard to better protect data accuracy, as NCES is unsure the level of detail adults can provide about the racial and ethnic identifications of other adults.

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 F1FT survey design, and a meeting is planned for December 2024 to inform the F1FS survey design. 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. Our experience on MGLS:2017 showed that no single incentive speaks to all schools, students, parents, or school staff. During the BYFS we offered an extensive menu of options that allowed schools to choose equal value non-monetary items in lieu of a check or gift card. These items included tickets to a school event, cafeteria credits, books for the library, ear buds, portable charger, or a donation to a school fund. Out of the 768 participating schools, only one school selected books for their library in lieu of the school donation. For F1FS we recommend retaining the \$200 check incentive. Schools will also be offered a Staples gift card for school supplies in case schools cannot accept a check. Additionally, we will offer to donate the \$200 to a non-profit/charity organization designated by the school or an equivalent value of books for the school library. Schools will be able to choose the incentive that best works for their school. Table 1 summarizes the updated incentives planned for each respondent type and instrument/activity along with their estimated burden times and a brief justification.

Students

During school recruitment, HS&B:22 staff will discuss with the school if students are able to receive an incentive. Students that participate in school will be offered a gift card and students who participate out-of-school may select either a gift card or a paper check. This will be negotiated with the school at the time of recruitment and only when approved will be offered to students. For those sample members no longer in a sampled school, they will follow the out-of-school incentive protocol.

In BYFS and F1FT, OMB approved the amount of \$10 for students that participated in the in-school administration and \$25 for students that participated in the out-of-school self-administered session. During F1FT, response rates for both in-school and out-of-school students were lower than expected. Notably, response rates were even lower for students with critical characteristics such as those recently returning to school, or identifying as Black, non-Hispanic. It is particularly important to include students from such groups to obtain representative results, and they may be more likely to participate if offered a higher incentive.

To increase participation overall and in key domains, we recommend an increase of \$15 for both in-school and out-of-school administrations, so students would receive \$25 or \$40, respectively. The \$40 incentive for respondents participating out-of-school is the maximum amount but will be split into two \$20 increments. Students will receive \$20 for completion of the survey and \$20 for the math component. Incentives will be offered as a gift card for students participating in school. Students who participate out-of-school will have the option to select a gift card or a paper check. The proposed increased incentive rate is designed to meet current high school students' expectations of compensation for their time and efforts. Further, the incentive increase is equivalent to what OMB has approved for college students participating in the National Post Secondary Student Aid Study (NPSAS), which is \$30 base with an additional boost of \$10 for some students.

Students will participate in a 90-minute session¹ in their school or in an out-of-school administration. Five minutes are built in to the 90-minute session for introductory and assent purposes. In addition, students will receive a certificate for 2 hours of community service from the U.S. Department of Education.

For BYFS, to encourage 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. During F1FT, food events were also held at schools where SCs expressed low attendance rates of 12th-grade students. For F1FS we recommend offering additional food events to encourage students to attend school on the scheduled student session date so they can participate in HS&B:22. These food events can be offered as an additional incentive to encourage participation when SCs indicate a low attendance rate for their school. All explicit consent schools will continue to receive a food event, if permitted by the district or school.

Table 1. HS&B:22 First Follow-up Full-scale Instrument/Activity Burden Time and Incentive Amounts

Activity	Burden Time ¹	First Follow-up full-scale (F1FS) Incentives
Student return of parent consent forms and to encourage student attendance on session date	10 minutes	Choice of Food event at school (e.g., pizza, bagels, etc.) sponsored by the study or \$3 voucher for school cafeteria
Tracking Activity	10 minutes	\$10 for families who complete a tracking activity and update their current mailing address, phone number and email.
Student Assessment and Survey - In-school administration	90 minutes	\$25 (check or gift card) Certificate for 2 hours of community service from the U.S. Department of Education
Student Assessment and Survey - Out-of-school administration	90 minutes	\$40 (check or gift card). \$20 for completion of the student survey and \$20 for the math component. Certificate for 2 hours of community service from the U.S. Department of Education
School Participation		\$200 Check , gift card, donation to charity, or equivalent value in books for library, and continuing education credit for staff ² Staff at participating schools will be invited to webinars and can choose to attend: (1) Family Engagement in the Secondary School, (2) Supporting Multilingual Learners, and (3) Student Engagement to Improve Attendance.
School Coordinator ³ (logistics, on-site visit, consent forms, administrative records, etc.)	2 hours to schedule and assist with assessments 6 hours to provide roster from administrative records 6 hours for consent assistance 2 hours to coordinate session logistics 6 hours to complete enrollment status update	\$100 for data collection activities \$50 for 12th grade roster \$50 for enrollment status update
IT Coordinator	2 hours	\$50 to complete feasibility questions and provide as needed technical support before and during the session

¹ Please see corresponding text below for an explanation of the burden time.

¹ All communication materials will state 90-minute student session, even if the session ends up slightly shorter. This communication is consistent with F1FT and allows extra time for any troubleshooting that may be necessary for schools using own devices to participate.

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

² 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.

³ Participating base year schools will complete an enrollment status update and a 12th grade roster. Schools that only participate in the 12th grade cohort will only provide a 12th grade roster.

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 F1FS, all schools will be offered an incentive of \$200 to encourage participation in HS&B:22, in the form of either a check or Staples gift card for school supplies. Schools unable to accept a monetary incentive can choose to donate their incentive to a non-profit/charity or order an equivalent value of books for the school library.

Staff from participating schools will be invited to attend webinars on timely topics and the sessions will be held during various time zones. The webinars selected for F1FS: Family Engagement in the Secondary School, Student Engagement to Improve Attendance, and Supporting Multilingual Learners. Staff who attend will receive a digital certificate of participation. In addition, participating schools will receive school-level results. Results will provide scores (see Appendix A.26) for their school (if they meet participating criteria) and for schools “like theirs” as defined by locale, type, and region (e.g., rural public schools in the South).

School Coordinators

School coordinators will be offered up to \$200. 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 students 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.

For schools that did not participate in the base-year study, the school coordinator will provide a roster of all 12th grade students from which a sample of students will be selected to participate.

For schools that participated in the base-year study, the school coordinator will be asked to complete a tracking activity, or enrollment status update (ESU), to learn whether study students are currently enrolled at the school in the 2025-26 year. For students who have moved to another school, SCs will be asked to provide name and location of the new school, the reason why the student transferred, and updated parent contact information. This ESU process was found to take SCs on average approximately 6 hours during the F1FT and SCs received a \$50 incentive which was found highly effective. An 86% response rate was achieved in the F1FT for the enrollment status update. We recommend offering the same ESU incentive amount for F1FS.

IT Coordinators

During the F1FT, it was determined that an Information Technology (IT) coordinator was necessary at schools who opt to use school computers for the student session. This staff member verified the school could accommodate using school computers by completing a feasibility questionnaire, see Appendix A.25. During the field test, 64 schools returned the feasibility questionnaire, but an incentive was not provided. The IT coordinator’s assistance is critical to this shift in data collection to allowing schools to use their own devices and Internet for the HS&B:22 and will include additional tasks beyond completing the feasibility questionnaire.

Prior to the student session, the IT coordinator will test the HS&B:22 student survey URL using a student device to ensure the session will run. IT coordinators may also conduct troubleshooting steps, such as adding the HS&B:22 student survey URL to the district’s safe list of websites. The IT coordinator may also assist during the set-up for the student session day to connect the school computers to the HS&B:22 student session website. OMB approved a \$50 honorarium for IT coordinators in the predecessor study HSLS:09 for similar activities, and we propose to offer the same amount for F1FS.

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 and cybersecurity; controlled and protected access to computer files; data collection management systems and system infrastructure that is FIPS (federal information processing standards) moderate level security compliant. HS&B:22 follows FIPS moderate security guidelines. 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 two-factor authentication is required to access the study website.
2. Through the website, the primary coordinator 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 twelfth-grade students and an enrollment status update 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 Longitudinal Study of 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 Longitudinal Study of 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; in the separate submission to OMB for instruments and data collection for F1FS, additional detail on sensitive topics will be presented.

Schools. Schools (or school districts on behalf of schools) will be asked to provide rosters of all students in grade 12 in F1FS for sample freshening so that a nationally representative sample of students are selected. Returning schools to the study will also be asked to provide an enrollment status update for all sampled students which includes the students' current school, the parent contact information, and transfer school if applicable. 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.

A.12 Estimates of Response Burden

Burden estimates for all activities associated with F1FS recruitment are shown in Table 2. For F1FS 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, assist with the student session, and distribute and track parent permission forms. For schools that participated in the base year study, the SC will also complete an enrollment status activity that is an estimated 6 hours. IT coordinators' total burden time is 2 hours to complete a feasibility questionnaire and provide tech support to students using school devices and/or network. In the F1FS, returning study students will be invited to participate and some schools will have additional students invited to participate due to freshening. Parents of sampled students are estimated to spend about 10 minutes to complete the tracking activity by providing updated contact information.

Table 2. HS&B:22 First Follow-up Full-scale Recruitment and Tracking 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 Full-scale Recruitment								
Nonparticipating districts	1,483	20%	297	297	20	99	\$53.36	\$5,283
Participating districts		80%	1186	1186	260	5,139	\$53.36	\$274,235
District IRB staff study approval	240	100%	240	240	120	480	\$53.36	\$25,613
District IRB panel study approval ²	1,200 ²	100%	1,200	1,200	120	2,400	\$53.36	\$128,064
Nonparticipating eligible schools	2,991	72.5%	2,164	2,164	20	722	\$53.36	\$38,526
Participating schools (in-school)		26.3%	785	785	260 ³	3,402	\$53.36	\$181,531
Participating schools (out of school only)		1.4%	42	42	260 ³	182	\$53.36	\$9,712
School Coordinators (data collection assistance) ⁴	839	100%	839	839	600	8,390	\$35.48	\$297,678
School Coordinators (enrollment status +		82%	692 ⁵	692	720	8,304	\$35.48	\$294,626

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
roster data) ⁵								
School Coordinators (enrollment status OR roster data)		18%	147	147	360	882	\$35.48	\$31,294
IT Coordinators	839	95%	797	797	120	1,594	\$35.48	\$56,556
Students' parents (tracking)	25,926	30%	7,778	7,778	10	1,297	\$31.48	\$40,830
Total F1FS Recruitment and Tracking⁶			16,167	16,167		32,891		1,383,948

¹ The average hourly earnings of parents derived from May 2023 Bureau of Labor Statistics (BLS) Occupation Employment Statistics is \$31.48; of high school teachers is \$35.48; of education administrators is \$53.36; and of educational guidance counselors is \$32.21. If mean hourly wage was not provided, it was computed assuming 2,080 hours per year. The exception is the student wage, which is based on the federal minimum wage. Source: BLS Occupation Employment Statistics, <http://data.bls.gov/oes/> datatype: Occupation codes: All employees (00-0000); High school teachers (25-2031); Education Administrators (11-9032); and Educational guidance counselors (21-1012); accessed on July 1, 2024.

² Based on the estimate that on average there will be 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 Based on the estimate that most BYFS schools will provide an enrollment status update and a 12th grade roster for freshening; schools not eligible for freshening are excluded from this estimate.

⁶ 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 first follow-up full-scale is \$19,543,329.

Table 3. Costs to NCES for HS&B:22 Follow-up Full Scale

Follow-up Full-Scale (F1FS)	
NCES salaries and expenses	\$187,500
Contract costs	\$19,355,829
Total	\$19,543,329

A.15 Reasons for Program Changes or Adjustments

The apparent increase in respondent burden as compared to the prior F1FT OMB package is due to the fact that the last clearance was for follow-up field test recruitment, sampling, and data collection activities. This request includes first follow-up full-scale sampling and recruitment. In addition, schools will be freshened, and additional nonparticipating schools contacted.

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. The following will be produced from the first follow-up 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 first follow-up full-scale study design and data collection procedures, including an appendix summarizing the methodological findings from the first follow-up 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)		
Track student sample	January 2022	May 2022
Collect student enrollment information	December 2022	May 2023
Recruit schools	April 2023	April 2024
Select 12th 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 12th grade rosters	August 2025	March 2026
Recruit schools	November 2024	February 2026
Freshen student sample	August 2025	March 2026
Recruitment of students and parents through requesting parent consent	October 2025	May 2026
Data collection	November 2025	June 2026
Process data, construct data files	February 2026	July 2027
Prepare reports	July 2026	July 2027

¹Recruitment 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.