2023–24 NATIONAL POSTSECONDARY STUDENT AID STUDY (NPSAS:24) FULL-SCALE STUDY

Student Data Collection and Student Records

Supporting Statement Part A

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Contents

A. Justification....1
1. Circumstances Making Collection of Information Necessary....1
   a. Purpose of this Submission....1
   b. Legislative Authorization....2
   c. Prior NPSAS Studies....2
   d. Prior and Related Studies....3
2. Purposes and Uses of the Data....4
   a. NPSAS:24 Purposes....4
   b. NPSAS:24 Research and Policy Issues....4
3. Use of Information Technology....6
4. Efforts to Identify Duplication....6
5. Method Used to Minimize Burden on Small Businesses....7
6. Frequency of Data Collection....7
7. Special Circumstances of Data Collection....8
8. Consultants Outside the Agency....8
9. Provision of Payments or Gifts to Respondents....8
10. Assurance of Confidentiality....9
   a. Enrollment Lists and Student Records....12
   b. Student Survey....12
11. Sensitive Questions....13
12. Estimates of Response Burden....14
13. Estimates of Cost....15
14. Costs to Federal Government....15
15. Reasons for Changes in Response Burden and Costs....15
16. Publication Plans and Time Schedule....16
17. Approval to Not Display Expiration Date for OMB Approval....16
18. Exceptions to Certification for Paperwork Reduction Act Submissions....16

B. Collection of Information Employing Statistical Methods

Appendixes
A. Technical Review Panel Members
B. Endorsing Organizations for NPSAS:24
C. Confidentiality for Administrative Record Matching
D. Institution Contacting Materials
E. NPSAS:24 Institution Staff Usability Testing Summary
F. Student Records Instrument
G. Sample Member Focus Group Report
H. Spanish Cognitive Testing Report
I. Results of the NPSAS:24 Field Test Experiment
J. Student Data Collection Materials
K. Student Survey Instrument

Tables

Table 1. Chronology of NPSAS and its longitudinal components.....3
Table 2. Average estimated burden to institution respondents for the NPSAS:24 data collection.....14
Table 3. Costs to NCES for the NPSAS:24 full-scale study.....15
Table 4. .....Operational schedule for NPSAS:24 15

A. Justification

1. Circumstances Making Collection of Information Necessary

a. Purpose of this Submission

This request is to conduct the 2023–24 National Postsecondary Student Aid Study Student Records Collection and Student Survey (NPSAS:24). This study is being conducted by the National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES), part of the U.S. Department of Education. The primary contractor for this study is RTI International (Contract# 91990022C0017). Subcontractors for NPSAS:24 include Activate Research, Inc.; ARSIEM Corporation; EurekaFacts, LLC; ForumOne Communications Corp.; HR Directions, LLC; KEN Consulting, Inc.; Leonard Resource Group; Research Support Services, Inc.; Strategic Communications, Inc.; The Equity Paradigm; and Whitworth Kee Consulting, LLC. Dr. Eric Atchison, Dr. Sandy Baum, Dr. Vincent Castano, Dr. Anthony Jones, Richard Reeves, Dr. Matt Springer, and Dr. Shelly Steward are consultants for the study.

This submission covers materials, instruments, and procedures related to abstractions of student postsecondary records and student surveying as part of the NPSAS:24 data collection. NCES submitted a separate clearance package covering institution sampling, enrollment list collection, and matching to administrative data files in the summer of 2023. The materials and procedures are based on those developed for previous student data collections, including the 2019–20 National Postsecondary Student Aid Study (NPSAS:20) [OMB #1850-0666 v.25], and the 2015-16 National Postsecondary Student Aid Study Administrative Collection (NPSAS:16) [1850-0666 v.17]. This submission is designed to adequately justify the need for and overall practical utility of the full study, presenting the overarching plan for all of the phases of the institution and student sampling and providing as much detail about the measures to be used as is available at the time of this submission. As part of the completed field test, NCES published a notice in the Federal Register allowing first a 60- and then a 30-day public comment period. Field test materials, procedures, and results have informed this request for clearance for the full-scale study. For this full-scale study, NCES will publish a notice in the Federal Register allowing an additional 30-day public comment period on the final details of the NPSAS:24 full-scale study.

NCES implemented the first NPSAS during the 1986–87 academic year to meet the need for national data about significant financial aid issues. Since 1987, NCES has fielded NPSAS every 2 to 4 years, most recently during the 2019–20 academic year (NPSAS:20). NPSAS:24 will be a nationally-representative study. The NPSAS:24 sample size will include about 2,025 institutions from which will be sampled 137,000 nationally representative undergraduate and 25,000 nationally representative graduate students who will be asked to complete a survey and for whom we will collect student records and administrative data. NPSAS:24 was scheduled to serve as the base year for the 2024 cohort of the Baccalaureate and Beyond (B&B) Longitudinal Study, but no funding is available to field follow-up surveys. In the event Congress appropriates additional funds, the NPSAS:24 sampling design will include a nationally representative sample of students who will complete requirements for the bachelor's degree during the NPSAS year (i.e., completed at some point between July 1,

2023, to June 30, 2024). Subsets of questions in the student survey focus on describing aspects of the experience of students in their last year of postsecondary education, including student debt, education experiences, and preparation activities for those planning to teach at the preK through 12th grade level.

This submission describes the planned sampling, recruitment, and data collection procedures, and includes

- a list of individuals on the NPSAS:24 Technical Review Panel (TRP) (appendix A);
- a list of organizations and associations endorsing and supporting NPSAS:24 (appendix B; unchanged);
- a description of the confidentiality procedures in place for the administrative record matching (appendix C; carried over);
- contacting materials for institution staff providing enrollment lists with translations (appendix D1; carried over) and for student records (appendix D2);
- a summary of usability testing with institution staff (appendix E; carried over);
- the student records instrument (appendix F);
- the sample member focus group (appendix G) and Spanish-language cognitive testing (appendix H) reports;
- results of the NPSAS:24 field test incentive experiment (appendix I);
- student data collection materials (appendix J); and
- the student survey instrument (appendix K).

Appendixes A through E were included in the full-scale institution contacting and list collection package approved in September 2023 (1850-0666 v.35). Appendixes noted as *carried over* were reviewed in the list collection package (v. 35) and are included here for completeness. Appendixes noted as *unchanged* contain material reviewed as part of the list collection package (v.35) that is also relevant to this package (v.36) but has not required an update.

b. Legislative Authorization

NCES conducts NPSAS:24 in close consultation with other U.S. Department of Education offices, federal agencies, and organizations (see sections A.4 and A.8 of this document). NCES is authorized to conduct NPSAS under the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543) and the Higher Education Opportunity Act of 2008 [HEOA 2008, 20 U.S.C. §1015(a)(k)]:

> "Student aid recipient survey
> (1) Survey required: The Secretary, acting through the Commissioner for Education Statistics, shall conduct, on a State-by-State basis, a survey of recipients of Federal student financial aid under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42—
> (A) to identify the population of students receiving such Federal student financial aid;
> (B) to describe the income distribution and other socioeconomic characteristics of recipients of such Federal student financial aid;
> (C) to describe the combinations of aid from Federal, State, and private sources received by such recipients from all income categories;

(D) to describe the—
(i) debt burden of such loan recipients, and their capacity to repay their education debts; and
(ii) the impact of such debt burden on the recipients' course of study and post-graduation plans;
(E) to describe the impact of the cost of attendance of postsecondary education in the determination by students of what institution of higher education to attend; and
(F) to describe how the costs of textbooks and other instructional materials affect the costs of postsecondary education for students.

(2) Frequency: The survey shall be conducted on a regular cycle and not less often than once every four years.

(3) Survey design: The survey shall be representative of students from all types of institutions, including full-time and part-time students, undergraduate, graduate, and professional students, and current and former students.

(4) Dissemination: The Commissioner for Education Statistics shall disseminate to the public, in printed and electronic form, the information resulting from the survey."

c. Prior NPSAS Studies

As noted above, NPSAS:24 will be the twelfth NPSAS in a series dating back to 1987. Since its inception, the data collection techniques, sources, and sampling and weighting methods used for NPSAS have been updated to meet increasing demand for more precise and detailed information to inform postsecondary student financial aid policy. The first study in the series, NPSAS:87, combined paper-based surveys of 40,000 students enrolled in postsecondary education in the fall term of 1986 and a subset of their parents with institutional records. NPSAS:90 expanded the sample to students enrolled in postsecondary education at any time during a full academic year, so that students enrolled only during the summer or spring terms, as well as those who began at any time in institutions not on a traditional calendar system (primarily vocational institutions), were included. NPSAS:90 also introduced computer-assisted telephone interviewing and incorporated data from the federal Pell Grant payment file. NPSAS:93 enabled institutions to enter student records electronically, and NPSAS:96 added as data sources the Central Processing System (CPS) for federal financial aid applications, the National Student Loan Data System (NSLDS), and SAT and ACT student test scores.

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

Veterans Benefits Administration (VBA). Additional details about each of the prior NPSAS studies and related longitudinal studies conducted by NCES are provided at https://nces.ed.gov/surveys/npsas/.

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

NPSAS:20 combined the nationally- and state-representative administrative collection, like that of NPSAS:18-AC, with the web-based student survey. NPSAS:20 also served as the base year collection for the 2020 Beginning Postsecondary Students (BPS) Longitudinal Study. The NPSAS:20 data collection took place during the first year of the 2019 coronavirus pandemic and, as a result, student records and student survey items specific to its impact on enrollment, student finances, and financial aid were added.

d. Prior and Related Studies

Two longitudinal studies conducted within the Sample Surveys Division of NCES were designed to address a variety of issues regarding higher education. Based on samples of students enrolled for postsecondary education in a particular year regardless of age, each of these studies incorporates base year data from the cross-sectional NPSAS and extends it through longitudinal follow-up components focusing on first-time beginning students (FTBs) and on recent college graduates in alternate NPSAS survey years: Beginning Postsecondary Students (BPS) and Baccalaureate and Beyond (B&B). The chronology of the previous administrations of the NPSAS study and its associated longitudinal components is presented in table 1.

Table 1. Chronology of NPSAS and its longitudinal components

Base year	First follow-up	Second follow-up	Third follow-up
NPSAS:90	BPS:90/92	BPS:90/94	—
NPSAS:93	B&B:93/94	B&B:93/97	B&B:93/03
NPSAS:96	BPS:96/98	BPS:96/01	—
NPSAS:2000	B&B:2000/01	‡	‡
NPSAS:04	BPS:04/06	BPS:04/09	—
NPSAS:08	B&B:08/09	B&B:08/12	B&B:08/18
NPSAS:12	BPS:12/14	BPS:12/17	—
NPSAS:16	B&B:16/17	B&B:16/20	‡
NPSAS:18-AC	—	—	—
NPSAS:20	BPS:20/22	BPS:20/25	—
NPSAS:24	‡	‡	‡

— Not applicable.
‡ - No funding available to field the B&B study.
NOTE: BPS = Beginning Postsecondary Students; B&B = Baccalaureate and Beyond.

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

1. Undergraduate access/choice of institution;

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

2. Purposes and Uses of the Data

This section provides information on the purposes of NPSAS and an overview of the primary research issues it addresses.

a. NPSAS:24 Purposes

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

Ultimately, data collected via NPSAS:24 will make important contributions to studies of postsecondary education policy at the federal, state, and sector levels. The data can be used to calculate statistics through DataLab, a web-based software application available to the public at https://nces.ed.gov/datalab, and to qualified researchers through the IES restricted-use data licensing program (https://nces.ed.gov/pubsearch/licenses.asp).

A second purpose of NPSAS is to gather base-year data on a subset of students who will complete requirements for a bachelor's degree during the NPSAS year. Although the first follow-up, B&B:24/25 has not been exercised by NCES, NPSAS:24 will sample 4th and 5th year students enrolled in bachelor's degree programs to establish the base year cohort for the B&B, to allow for potential follow-up surveys in the future if funding becomes available. A section of the student survey will capture information about students' graduate school and career plans to support analysis of graduate education and employment outcomes, with a special emphasis on students considering and pursuing careers in elementary and secondary teaching. In addition, the base year survey will include some items typically included in the first B&B follow-up survey.

b. NPSAS:24 Research and Policy Issues

Many of the important questions that NPSAS:24 aims to address are the same as in the past years. College cost increases, net price levels, grants, and increases in student loan debt will continue to be central issues. The NPSAS:24 data will be used to address policy issues related to changes in federal financial aid programs resulting from the anticipated reauthorization of the Higher Education Act. Following are some of the primary research and policy issues that could be addressed using NPSAS:24 data:

(1) Student demographics;

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

(2) Academic preparation and programs;

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

(3) Financial aid;

- What proportion of students needs financial aid, and what is the average amount of need by income?
- What proportion of students has remaining need beyond what they receive in financial aid, and what is the average amount of unmet need?
- What proportion of students receives federal Pell grants, and where do they attend college?
- What proportion of students is receiving aid from states, institutions, employers, and private sources, and what is the average amount received?
- What proportion of students is receiving need-based or merit-based aid?
- How does the amount and type of aid vary by dependency status and income level?
- What is the ratio of federal to nonfederal aid at various types of institutions?
- What is the ratio of grants to loans at various types of institutions?
- What proportion of students receives veterans and other Department of Defense benefits, and how much do they receive?
- How has the incidence and average amount of veterans' benefits changed since the enactment of the Post-9/11 GI Bill (P.L. 110-252)?
- How has the number and proportion of nonveterans receiving veterans' benefits as dependents of veterans changed since enactment of the Post-9/11 GI Bill (P.L. 110-252)?
- What types of institutions enroll the highest proportions of active-duty military personnel, veterans, and recipients of veterans' benefits?

(4) Price of attendance;

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

(5) Student borrowing;

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

(6) Student employment;

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

(7) Sources of funds;

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

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

3. Use of Information Technology

NPSAS:24 student records data will be collected using the same Postsecondary Data Portal (PDP) website already in use by institutions to provide enrollment lists. Separate login credentials are created for each user at the participating institution. For NPSAS:24,

postsecondary institutions will be offered four modes for providing data (see section 5 of this document for more detail).

The NPSAS:24 student survey will use web-based questionnaires across two electronic modes of data collection: a self-administered survey, which is mobile-friendly to allow completion of the survey on a tablet or smartphone, and computer-assisted telephone interviewing (CATI). The survey will be available through the study website that resides on NCES servers.

On a nightly basis, the data collection contractor will download student record and student survey data from Department servers to their FIPS-Moderate network via a secure web service. Once in the FIPS-Moderate network, data will be cleaned and undergo quality analysis. The websites used for the NPSAS:24 data collection will reside on NCES' Secure Socket Layer-certified (SSL) servers with a secure data connection. SSL protocol is used to encrypt the data transmitted over the Internet, and all parts of the websites that collect student data are password protected. The forms that gather data on these websites will require session cookies to run in accordance with the U.S. Department of Education's privacy policy for the use of cookies. The most recent versions of Microsoft Edge or Google Chrome allow for rejecting all cookies other than those required for session tracking.

NPSAS:24 includes data linkages with many existing sources of valuable data, listed in appendix C, including the Department of Education's CPS for FAFSA data, NSLDS, and NSC; military service records from VBA; and admissions test scores from ACT and The College Board. Security measures have been put in place to protect data during these file matching procedures. NCES has a secure data transfer system, which uses SSL technology, allowing the transfer of encrypted data over the Internet. The IES File Transfer System will be used for all administrative data sources that do not have their own secure file transfers systems All data transfers will be encrypted.

4. Efforts to Identify Duplication

Efforts to identify duplication have included NCES consultations with other federal offices, such as the U.S. Department of Education's Office of Postsecondary Education; the Office of Planning, Evaluation, and Policy Development; and other agencies, such as the Government Accountability Office; the Congressional Budget Office (CBO); and the Office of Management and Budget (OMB). In addition, NCES collaborates with the National Center for Science and Engineering Statistics (NCSES) at the National Science Foundation (NSF) to ensure that each unit is kept up to date on each other's studies pertaining to postsecondary students and institutions. NCES and NSF meet on a regular basis to cover topical issues relevant to both offices, and each has staff serving on study TRPs. To confirm that data collected through NPSAS are not available from any other sources, NCES routinely consults with nonfederal associations, such as the American Council on Education, the Career Education Colleges and Universities, the National Association of Student Financial Aid Administrators, the National Association of Independent Colleges and Universities, the Council of Graduate Schools, the Institute for Higher Education Policy, the State Higher Education Executive Officers Association, and the National Association of State Student Grant and Aid Programs, whose

members are invited to sit on the TRP. NCES also consults with academic researchers, several of whom also attend the NPSAS TRP meetings. Beyond identification of duplication, these consultations provide methodological insights from the results of similar and related studies conducted by NCES, other federal agencies, and nonfederal sources. The consultations also assure that data collected through NPSAS will meet the needs of the federal government and relevant organizations. No studies in the United States singularly duplicate the data produced by NPSAS.

5. Method Used to Minimize Burden on Small Businesses

The burden associated with enrollment list collection is relatively low for all institutions, including small businesses that may be contacted as part of NPSAS:24 (private for-profit schools and other small public and private schools). NPSAS:24 is asking for a readily-available set of variables on the enrollment lists, and institutions will be offered alternative methods of providing requested data, including uploading to a secure website or emailing encrypted list files. We will attempt to minimize the intrusion and burden to such schools by working closely with a school-appointed coordinator before the data collection effort to identify the sources of information within the school and the format in which records are kept. We have also discussed enrollment list variables with NPSAS consultants involved with institution records to confirm that the request is minimally burdensome and consistent with typical recordkeeping at postsecondary institutions. Spanish translations of letters to the chief administrator and coordinator as well as the study brochure and the Quick Guide to NPSAS:24 (appendix D) will be sent to institution staff at institutions in Puerto Rico.

The same institutions providing enrollment lists will also be asked to provide student record data. NPSAS:24 will offer a choice of four modes for submitting the requested data: web mode, Excel mode, CSV mode, and an alternate mode for institutions that cannot provide data in one of the other three modes. They will have the option of using an alternate upload page that will accept data in any format; this alternate mode will be offered on a case-by-case basis. These options aim to minimize burden on institutions, which may select the most convenient and least burdensome format(s) for their staff and record-keeping systems. The data entry modes available to participating institutions are described in section B.3 of the Supporting Statement Part B.

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

The student survey does not involve small businesses or entities.

6. Frequency of Data Collection

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

7. Special Circumstances of Data Collection

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). The NPSAS:2024 data collection described in this package is not compliant with the new standard and continues to use race and ethnicity categories as described in the 1997 SPD 15 standards.

NPSAS collects race and ethnicity data in multiple ways, from individual student respondents in the Student Data Collection, from postsecondary institutions as part of the Enrollment List Data Collection, and from occasional NPSAS Administrative Collections that are solely reliant on administrative data sources. NPSAS:24 started Enrollment List Data Collection in the first half of 2024 and began Student Data Collection in February 2024. Because data collection for NPSAS:24 is already well underway, NCES has chosen not to update the student race and ethnicity items at this time.

The next NPSAS study is currently expected to take place in the 2026-27 school year, and will be a NPSAS Administrative Collection. All data collected in Administrative Collections is reported by third-party data collection, and it is not year clear if postsecondary institutions will be prepared to submit third-party race and ethnicity data in accordance with the revised SPD 15 standards at that time. NCES and the Department of Education are currently working with a number of stakeholders to establish timelines for compliance for all school systems and postsecondary institutions across the country. The details of these timelines

will be included in the ED Action Plan on Race and Ethnicity when it is submitted to OMB on or by September 28, 2025.

8. Consultants Outside the Agency

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

Previous NPSAS implementations have benefited from a TRP composed of staff from several offices in the Department of Education; representatives of NSF, OMB, and CBO; and nonfederal members who are considered experts in postsecondary education issues, including financial aid (a list of the TRP members participating for NPSAS:24 is provided in appendix A). A TRP meeting was held August 16 and 17, 2023, in advance of this package submission.

9. Provision of Payments or Gifts to Respondents

Institutions may require reimbursement for the cost of time spent preparing and providing enrollment lists. Expenses will be reimbursed to the extent that they are reasonable and properly documented.

The use of incentives to motivate completion of the student survey can provide significant advantages to the government in terms of increased response rates and higher quality data with minimized nonresponse bias (Groves, Singer, and Corning, 2000).[1] In addition, the use of incentives may also result in decreased data collection costs due to improved efficiency. All eligible cases in the NPSAS:24 field test study were offered a monetary incentive for completing the student survey, paid after survey completion by the sample member's choice of check or PayPal. To determine the optimal amount and timing of incentives, given fixed overall data collection costs (i.e., the costs of incentives, nonresponse follow-up, and sample size constraints limiting power), we conducted an experiment in which field test sample members were offered either an initial incentive offer of $25, followed by an offer of an additional $10 to those who remained nonrespondents after four weeks of data collection (Group 1); an initial offer of $25 with an additional $20 boost offered to nonrespondents at the eight-week point (Group 2); or an incentive offer of $30 throughout the entire period of data collection (Group 3, control). Results of the experiment, which was designed to detect differences between groups no smaller than 4 percent at alpha= 0.05 and 80 percent power, showed no statistically significant differences in response rates across the three groups, are discussed further in section B.4 and in Appendix I.

For the full-scale data collection, therefore, all sample members will be offered the $30 incentive; $30 has been the base incentive amount for NPSAS sample members since 2004.

[1] Groves, R. M., Singer, E., & Corning, A. (2000). Leverage-saliency theory of survey participation: description and an illustration. *The Public Opinion Quarterly*, *64*(3), 299-308.

In addition, we anticipate that a boost incentive may be needed for student subgroups to further encourage participation and reduce the potential for nonresponse bias. We will monitor response rates overall, within data collection wave, and within key student subgroups, particularly those that will be oversampled because of historic underrepresentation (see B.2). At predetermined time points during data collection, we will model the likelihood of participation among nonrespondents to identify those least likely to respond. Results will be shared with OMB, with a recommendation on whether these cases should be offered a $10 boost. Toward the end of the NPSAS:20 student data collection, a similar $10 boost offered to key subgroups resulted in an average response rate increase of 17.5 percent points over projected levels for sample members who received the boost. For additional details about the incentive plan, see B.3.

Prior to the start of data collection, NPSAS:24 sample members will be matched to a federal database maintained by the U.S. Department of the Treasury's Office of Foreign Assets Controls (OFAC). OFAC administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals. As part of its enforcement efforts, OFAC publishes a list of individuals and companies called the "Specially Designated Nationals List" or SDN. Their assets are blocked and U.S. entities are prohibited from conducting trade or financial transactions with those on the list (https://www.treasury.gov/resource-center/sanctions/Pages/default.aspx). In order to determine if there are any NPSAS:24 sample members to whom NCES cannot offer an incentive, the sample members will be matched to the SDN using the Jaro-Winkler and Soundex algorithms recommended by OFAC. To avoid over-matching, NPSAS:24 staff will review the cases based on full name, date of birth, and address. The small number of individuals who cannot be confirmed as not matching the SDN list will receive a survey request without an incentive offer.

10. Assurance of Confidentiality

NCES assures participating individuals that all information collected under NPSAS:24 may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).

The primary contractor for this study is RTI International. Confidentiality and data security protection procedures have been put in place for NPSAS:24 to ensure that the contractor and its subcontractors comply with all privacy requirements, including:

1. The statement of work of this contract;
2. *Family Educational Rights and Privacy Act (FERPA) of 1974* (20 U.S.C. §1232(g));
3. *Privacy Act of 1974* (5 U.S.C. §552a);
4. *Privacy Act Regulations* (34 CFR Part 5b);
5. *Computer Security Act of 1987*;
6. *U.S.A. Patriot Act of 2001* (P.L. 107-56);
7. *Education Sciences Reform Act of 2002* (ESRA 2002, 20 U.S.C. §9573);
8. *Cybersecurity Enhancement Act of 2015* (6 U.S.C. §151);

9. *Foundations of Evidence-Based Policymaking Act of 2018,* Title III, Part B, Confidential Information Protection
10. The federal regulations pertaining to these laws;
11. Any revision or amendment to these laws and regulations;
12. The U.S. Department of Education General Handbook for Information Technology Security General Support Systems and Major Applications Inventory Procedures (March 2005);
13. The U.S. Department of Education Incident Handling Procedures (February 2009);
14. The U.S. Department of Education, ACS Directive OM: 5-101, Contractor Employee Personnel Security Screenings;
15. NCES Statistical Standards; and
16. All new legislation that impacts the data collected through the contract for this study.

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

By law (20 U.S.C. §9573), a violation of the confidentiality restrictions is a felony, punishable by imprisonment of up to 5 years and/or a fine of up to $250,000. The NPSAS:24 procedures for maintaining confidentiality include notarized (the requirement for notarization continues to be waived to accommodate restrictions due to COVID-19) nondisclosure affidavits obtained from all personnel who will have access to individual identifiers; personnel training regarding the meaning of confidentiality; controlled and protected access to computer files; built-in safeguards concerning status monitoring and receipt control systems; and a secure, staffed, in-house computing facility. NPSAS:24 follows detailed guidelines for securing sensitive project data, including, but not limited to: physical/environment protections, building access controls, system access controls, system login restrictions, user identification and authorization procedures, encryption, and project file storage/archiving/destruction.

Additionally, the contractor will take security measures to protect the web data collection applications from unauthorized access. The web server will include an SSL certificate and will be configured to force encrypted data transmission over the Internet. All files uploaded to the institution website (i.e., the PDP) will be stored in a secure project folder that is accessible and visible to authorized project staff only. To access restricted pages containing confidential information, website users will be required to log in by entering an assigned ID number and password. Through the website, the primary coordinators at the institution will be able to use a "Manage Users" link, available only to them, to add and delete user accounts for other staff at the same institution. The new users will be assigned a temporary

password, which they will be required to change upon logging in to the website for the first time.

As described in A.3., NPSAS:24, as well as other NCES postsecondary studies, include data linkages with many existing sources of administrative data. Confidentiality procedures for these data sources are described in appendix C. Many of these administrative data matches are not guaranteed and will require separate Memorandums of Understanding, Agreements, or Contracts with the entities responsible for the individual data elements. Security measures have been put in place to protect data during these file matching procedures. NCES has a secure data transfer system, which uses SSL technology, allowing the transfer of encrypted data over the Internet. The IES File Transfer System will be used for all administrative data sources that do not have their own secure file transfers systems All data transfers will be encrypted.

The Department 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.

Regarding the file matching with administrative sources, the Family Educational Rights and Privacy Act (FERPA, 34 CFR Part 99) allows the disclosure of personally identifiable information from students' education records without prior consent for the purposes of NPSAS:24 according to the following excerpts: 34 CFR §99.31 asks, "Under what conditions is prior consent not required to disclose information?" and explains in 34 CFR §99.31(a) that "An educational agency or institution may disclose personally identifiable information from an education record of a student without the consent required by §99.30 if the disclosure meets one or more" of several conditions. These conditions include, at 34 CFR §99.31(a)(3):

> "The disclosure is, subject to the requirements of §99.35, to authorized representatives of--
>
> (i) The Comptroller General of the United States;
>
> (ii) The Attorney General of the United States;
>
> (iii) The Secretary; or
>
> (iv) State and local educational authorities."

NPSAS:24 is collecting data under the Secretary's authority. Specifically, NCES, as an authorized representative of the Secretary of Education, is collecting this information for the purpose of evaluating a federally supported education program. Any personally

identifiable information is collected with adherence to the security protocol detailed in 34 CFR §99.35:

> "(a)(1) Authorized representatives of the officials or agencies headed by officials listed in §99.31(a)(3) may have access to education records in connection with an audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs.
>
> (2) The State or local educational authority or agency headed by an official listed in §99.31(a)(3) is responsible for using reasonable methods to ensure to the greatest extent practicable that any entity or individual designated as its authorized representative—
>
> (i) Uses personally identifiable information only to carry out an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements related to these programs;
>
> (ii) Protects the personally identifiable information from further disclosures or other uses, except as authorized in paragraph (b)(1) of this section; and
>
> (iii) Destroys the personally identifiable information in accordance with the requirements of paragraphs (b) and (c) of this section.
>
> (b) Information that is collected under paragraph (a) of this section must—
>
> (1) Be protected in a manner that does not permit personal identification of individuals by anyone other than the State or local educational authority or agency headed by an official listed in §99.31(a)(3) and their authorized representatives, except that the State or local educational authority or agency headed by an official listed in §99.31(a)(3) may make further disclosures of personally identifiable information from education records on behalf of the educational agency or institution in accordance with the requirements of §99.33(b); and
>
> (2) Be destroyed when no longer needed for the purposes listed in paragraph (a) of this section.
>
> (c) Paragraph (b) of this section does not apply if:
>
> (1) The parent or eligible student has given written consent for the disclosure under §99.30; or
>
> (2) The collection of personally identifiable information is specifically authorized by Federal law."

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

- There is minimal risk to the participants. There is no physical risk and only minimal risk associated with linkage of data to sample members. The public-use and restricted-use data, prepared as part of the contract with the data collection contractor, will not include Social Security Numbers (SSNs) or other extremely sensitive Personally Identifiable Information (e.g., name, birthdate, etc.) even though these data elements are used for the linkage. Data will undergo disclosure avoidance analysis and disclosure treatment steps to further reduce the risk.
- The waiver will not affect the rights and welfare of sampled students. Public-use and restricted-use data are only used for research purposes and lack direct individually-identifying information. The data are further protected through disclosure avoidance procedures approved by the NCES Disclosure Review Board.
- The study cannot be conducted practicably without the waiver. Data will be collected

from postsecondary institutions, and there will be no direct contact with sampled students. To obtain written consent from sampled students, multiple forms would have to be sent to them with multiple follow-up telephone and in-person visits. This process would add weeks to the data collection process and is not feasible from a time standpoint. Additionally, the value of these data would be jeopardized from a nonresponse bias perspective.

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

a. Enrollment Lists and Student Records

On institution contact materials, as appropriate:

NCES is authorized to conduct the 2023–24 National Postsecondary Student Aid Study (NPSAS:24) by the Education Sciences Reform Act of 2002 (ESRA 2002, 20 U.S.C. §9543) and the Higher Education Opportunity Act of 2008 (HEOA 2008, 20 U.S.C. §1015). The data are being collected for NCES by RTI International, a U.S.-based nonprofit research organization. All of the information [you provide/provided by individuals or institutions] 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 Family Educational Rights and Privacy Act of 1974 (FERPA, 20 U.S.C. §1232g) allows for the release of institution record information to the Secretary of Education or his agent without prior consent of survey members (34 CFR §§ 99.31(a)(3)(iii) and 99.35).

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control numbers for the voluntary information collections is 1850-0666. The time required to complete the information collections is estimated to average the number of minutes or hours listed below per response, including the time to review instructions, search existing data sources, gather the data needed, and complete and review the information collection.

If you have any comments concerning the accuracy of the time estimate, suggestions for improving the collections, or any comments or concerns regarding the status of your individual submission of these data, please write directly to: Postsecondary Data Portal studies, National Center for Education Statistics, PCP, 550 12th St., SW, Room 4007, Washington, DC 20202.

NPSAS:24 OMB Clearance No: 1850-0666 Expiration Date: xx/xx/xxxx
NPSAS:24 List Collection: 5 hours
NPSAS:24 Student Records Collection: 30 hours

b. Student Survey

On student contact materials, as appropriate:

NCES is authorized to conduct the 2023-24 National Postsecondary Student Aid Study by the Education Sciences Reform Act of 2002 (ESRA, 20 U.S.C. §9543), and to collect students'

education records from educational agencies or institutions for the purpose of evaluating federally supported education programs under the Family Educational Rights and Privacy Act of 1974 (FERPA, 34 CFR §§ 99.31(a)(3)(iii) and 99.35). The data are being collected for NCES by RTI International, a U.S.-based nonprofit research organization.

All of the information you provide may be used only for statistical purposes and may not be disclosed, or used, in identifiable form, for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this voluntary information collection is 1850-0666. The time required to complete this information collection is estimated to average approximately 30 minutes per survey response, including the time to review instructions, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this survey, or any comments or concerns regarding the status of your individual submission of this survey, please write directly to: The 2023-24 National Postsecondary Student Aid Study (NPSAS:24), National Center for Education Statistics, Potomac Center Plaza, 550 12th St., SW, Room 4007, Washington, DC 20202. OMB Clearance No: 1850-0666 Expiration Date: xx/xx/xxxx

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

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this voluntary information collection is 1850-0666. The time required to complete this information collection is estimated to average approximately 30 minutes per survey response, including the time to review instructions, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this survey, or any comments or concerns regarding the status of your individual submission of this survey, please write directly to: The 2023-24 National Postsecondary Student Aid Study (NPSAS:24), National Center for Education Statistics, Potomac Center Plaza, 550 12th St., SW, Room 4007, Washington, DC 20202. OMB Clearance No: 1850-0666 Expiration Date: xx/xx/xxxx.

11. Sensitive Questions

Institutions will be asked to provide personally-identifying information for students on the enrollment lists (including name, contacting information, SSN, and date of birth (DOB)). Although considered sensitive, items collected on the enrollment lists will facilitate 1) selection of the student sample, 2) initial tracing and locating activities, and 3) creation of the B&B:24 cohort and their ongoing follow up if needed. Immediately after the student sample is selected, the SSNs for non-selected students will be securely discarded. If a usable SSN is not obtained from an enrollment list, students will be asked to provide their SSN

within the student survey. Survey wording reminds students that providing an SSN is completely voluntary, and SSN information will be kept in protected data files only.

As described in this section, some NPSAS:24 student survey items are potentially sensitive questions commonly considered private. Consequently, procedures have been implemented (see section A.10) to provide assurances to sample members about the voluntary nature of participation in the study as well as the confidentiality provisions for survey responses.

The student survey collects information about earnings, assets, marital and dependency statuses, basic needs security, gender identity and sexual orientation, and experiences of discrimination and harassment at the NPSAS institution. Regulations governing the administration of these questions require: (a) clear documentation of the need for such information as it relates to the primary purpose of the study, and (b) provisions to clearly inform sample members of the voluntary nature of participation in the study, as well as information about how their responses will be protected and may be used only for statistical purposes and may not be disclosed, or used, in identifiable form for any other purpose except as required by law (20 U.S.C. §9573 and 6 U.S.C. §151).

Financial data related to earnings and assets, as well as marital and dependency statuses are key items used in calculating need for financial aid, parental contributions, and financial aid awards. Consequently, the data elements are critical to the conduct of policy-related analyses and to the modeling and projection of the effects of federal program changes on students and on program costs. Gender identity and sexual orientation can impact enrollment and employment experiences, a topic of growing interest for social research and policy.

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

NPSAS:24 will include the same question set measuring homelessness that was included in NPSAS:20 and the BPS:20/22 full-scale collection (OMB# 1850-0631 v.19). In addition to the FAFSA questions on homelessness, these surveys include an additional measure of homelessness that mapped onto the McKinney-Vento (42 US Code §§11431-11435) definition of homelessness that has been used in several large-scale postsecondary student studies. The inclusion of food security and homelessness measures will allow us to use nationally representative data to better understand whether the basic needs of postsecondary students are being met.

An expert panel convened by the National Academies of Science, Engineering, and Medicine (A Vision and Roadmap for Education Statistics |The National Academies Press) recommended that NCES "proactively embed diversity, equity, inclusion, and accessibility in all areas of its work and organization, to adapt and serve contemporary communities of the changing world of education" (p. 10). For the NPSAS:24 field test, we tested an eight-question set developed from existing postsecondary surveys that capture domains of diversity, equity, and inclusion only available from a student's self-report, including: the student's perception of NPSAS institutional climate, experiences of harassment or discrimination, safety at the NPSAS institution, and a measure on the racial/ethnic diversity of the student's community before attending postsecondary education. The questions were intended to supplement educational equity indicators already available from NPSAS, such as enrollment, borrowing, and student debt by student characteristics. For the full-scale collection, a subset of the field-tested items is included (see appendix K).

12. Estimates of Response Burden

Table 2 provides the projected estimates for response burden for the NPSAS:24 full-scale collection, which are based on experiences from prior rounds of NPSAS, including the recent NPSAS:24 field test. The response time for participating institutions will vary based on how institutions keep their records and how easily they can extract the requested information. The NPSAS:24 institution data collection includes four activities:

1) responding to eligibility-screening calls, which will be made only to sampled institutions for whom contact information could not be located through other sources (we estimate about 200 institutions will fulfill these criteria in NPSAS:24, based on our experience in the field test and prior administrations of NPSAS);
2) completing the Institution Registration Page (IRP), which collects basic information about institutional characteristics and term structure (we estimate that of the 2,025 institutions sampled for the full-scale collection, 97 percent will be eligible for NPSAS);
3) providing electronic lists of all students enrolled during the academic year either by uploading a file to the secure PDP website or e-mailing an appropriately encrypted file directly to the data collection contractor. (Based on prior results, we expect that most NPSAS:24 enrollment lists will be uploaded to the project website, and very few enrollment lists will be sent via email); and
4) providing student records data for the institution's sampled students.

The estimated burden for each of these activities is included in table 2; the sample sizes shown are discussed in Part B of this package. Using time-burden data for similar institutional data collection tasks, we estimate the average burden per institution to be approximately 5 hours for preparation of the enrollment list and the student record collection will on average require approximately 30 hours. Estimating an average hourly rate of $46.07[2] for the institutional staff, the 8,139 total burden hours translate to an

[2] The hourly rate ($46.07) was obtained using the hourly mean wage of operations research analysts in the May 2022 National Occupational and Employment Wage Estimates sponsored by the Bureau of Labor Statistics (BLS). Source: BLS Occupation Employment Statistics, https://data.bls.gov/oes/ data type: Occupation codes: Operations Research Analysts (SOC Code 152031); accessed on May 13, 2023.

estimated respondent burden time cost of approximately $374,964.

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

Table 2. Average estimated burden to institution and student respondents for the NPSAS:24 full-scale collection

Data collection activity	Sample	Expected eligible	Expected response rate (percent)	Expected number of respondents*	Expected number of responses	Average time burden per response (mins)	Total time burden (hours)
Full-scale							
Institution collection							
Eligibility-screening calls	200	194	100	194	194	5	17
Institution registration page	2,025	1,965	80	1,572	1,572	10	262
Institution enrollment lists	2,025	1,965	80	1,572	1,572	300	7,860
Institution Collection subtotal				***1,572***	***3,338***		***8,139***
Student data collection							
Institution student record							
Student record collection	1,572	1,572	90	1,415	1,415	1,800	42,450
Institution Student Record subtotal				**1,415**	**1,415**		**42,450**
Student survey							
Full	162,000	153,900	60	92,340	92,340	30	46,170
Abbreviated	162,000	153,900	10	15,390	15,390	10	2,565
Student Survey subtotal				**107,730**	**107,730**		**48,735**
Student Collection Total				**109,145**	**109,145**		**91,185**

* Unduplicated count of respondents.

NOTE: Gray font depicts activities for which burden is being carried over but not requested in this submission as it was approved in the NPSAS 2024 institution list collection package (OMB# 1850-0666 v.35). The subtotals for the student collection represent all burden newly requested in this submission.

13. Estimates of Cost

There are no additional costs to the respondents.

14. Costs to Federal Government

The total cost to the federal government for this administration of the NPSAS:24 study (field test and full-scale, list collection, student records collection, and student surveys) is $23,631,000, with an annualized cost estimate of $7,877,000.[3] A summary of costs is shown in table 3. Included in the estimates are staff time, reproduction, postage, and telephone costs associated with the data collection for which clearance is requested.

Table 3. Costs to NCES for the NPSAS:24 collection

NPSAS:24 implementation	Costs to NCES
Total	**$23,631,000**
NCES Salaries and expenses	$330,000
Contract costs	$23,301,000
Field test:	
Instrumentation and materials	$491,000
Data collection	$3,480,000
Systems and data processing	$2,450,000
Full Scale:	
Instrumentation and materials	$590,000
Data collection	$13,750,000
Systems and data processing	$2,540,000

[3] The annualized cost is estimated over three years, the length of the period of clearance requested.

15. Reasons for Changes in Response Burden and Costs

The increase in total burden hours from the last approved clearance is due to the fact that the last submission was for the now completed NPSAS:24 field test student records and student survey collection.

16. Publication Plans and Time Schedule

The operational schedule for the NPSAS:24 field test study is shown in table 4.

Table 4. Operational schedule for NPSAS:24

NPSAS:24 activity	Start date	End date
Field test collection		
Contacts with institutions	Sep. 28, 2022	Jun. 28, 2023
Enrollment list collection	Jan. 9, 2023	Apr. 28, 2023
Select student sample	Jan. 9, 2023	May 12, 2023
Collect student data from institutional records	Mar. 13, 2023	June 30, 2023
Self-administered web-based data collection	Mar. 6, 2023	Jun. 30, 2023
Process data	Mar. 7, 2023	Aug. 30, 2023
Prepare methodology memorandum	Jun. 5, 2023	Dec. 29, 2023
Full-scale collection		
Contacts with institutions	Sep. 11, 2023	Oct. 18, 2024
Enrollment list collection	Jan. 8, 2024	July 8, 2024
Select student sample	Jan. 15, 2024	July 12, 2024
Collect student data from institutional records	Feb. 12, 2024	Oct. 18, 2024
Self-administered web-based data collection	Feb. 5, 2024	January 12, 2025
Process data	Feb. 5, 2024	Mar 7, 2025
Prepare data file documentation	May 30, 2024	May 29, 2026

The following NPSAS:24 reports, publications, and other public information releases are planned at the conclusion of the full-scale data collection:

- descriptive summaries of significant findings for dissemination to a broad audience, including a First Look report;
- detailed data file documentation describing all aspects of the full-scale study design and data collection procedures, and an appendix summarizing the methodological findings from the field test;
- complete data files and documentation for research data users in the form of both a restricted-use file;
- the DataLab public-use data analysis system in which users create their own tables and charts using predefined categories from a subset of variables, including PowerStats, which can conduct regression analyses and allows users to analyze data across NPSAS administrations with optional automatic inflation adjustments for dollar values); and
- Special tabulations of issues of interest to the higher education community, as determined by NCES.

17. Approval to Not Display Expiration Date for OMB Approval

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

18. Exceptions to Certification for Paperwork Reduction Act Submissions

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