

2020/25 Beginning Postsecondary Students (BPS:20/25) Full-Scale Study

Supporting Statement Part A

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A. Justification

1. Circumstances Making Collection of Information Necessary

a. Purpose of this Submission

This request is for the National Center for Education Statistics (NCES), within the Institute of Education Sciences (IES), a part of the U.S. Department of Education, to conduct the full-scale data collection for the 2020/25 Beginning Postsecondary Students Longitudinal Study (BPS:20/25). The primary contractor for this study is RTI International (Contract# 919900-18-C-0039) and subcontractors include Activate Research, Inc.; EurekaFacts, LLC; HR Directions, LLC; Leonard Resource Group; Research Support Services, Inc.; and Strategic Communications.

This submission covers BPS:20/25 full-scale materials and procedures required for conducting the student survey and for matching data to administrative records. The materials for the BPS:20/25 full-scale study are based upon the field test materials. 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 data collection and providing as much detail about the measures to be used as is available at the time of this submission. Prior to the 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 BPS:20/25 full-scale study.

BPS studies are designed to follow a cohort of students who enroll in postsecondary education for the first time during the same academic year, irrespective of the date of high school completion. The study collects data on students' persistence in and completion of postsecondary education programs; their transition to employment; demographic characteristics; and changes over time in their goals, marital status, income, and debt, among other indicators. Nationally representative data from BPS are used to help researchers and policymakers better understand how financial aid influences persistence and completion, what percentages of students complete various degree programs, what are the early employment and wage outcomes for certificate and degree attainers, and why students leave school.

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

- A membership list of the Technical Review Panel (TRP) (appendix A);
- A description of the confidentiality procedures in place for the administrative record matching (appendix B);
- Data collection contacting materials (appendix C);
- Results of the BPS:20/25 field test procedures and methods (appendix D); and
- Survey instrument (appendix E).

b. Legislative Authorization

NCES conducts BPS:20/25 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 BPS 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 BPS Studies

With the first BPS cohort starting in 1990 (BPS:90), the BPS:20 cohort is the fifth study of beginning postsecondary students. Beginning with the BPS:96 cohort, first time beginning (FTB) students are surveyed at three points in time for up to 6 years: in the base year (through the NPSAS student interview) and 3 and 6 years later in the BPS follow-up interviews.

d. Prior and Related Studies

The chronology of the previous administrations of the National Postsecondary Student Aid Study (NPSAS) study and its associated BPS and Baccalaureate and Beyond (B&B) longitudinal components are shown in Table 1 below.

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 BPS and an overview of the primary research issues it addresses.

a. BPS:20/25 Purposes

With its longitudinal perspective, BPS provides key measures for understanding undergraduate persistence and attainment, transfer patterns, employment while enrolled, and student loan debt over time. It also tracks changes over time in students' goals, marital status, income, and debt. Because BPS traces a student's path throughout the postsecondary education system over a number of years, it provides a much more complete picture of postsecondary persistence and success than studies that cannot track students once they leave a particular institution.

The major issues addressed in BPS are:

- persistence in, and completion of, postsecondary education programs,
- transition to employment,
- demographic characteristics, and
- changes over time in goals, marital status, income, and debt.

BPS:20/25 will continue following a cohort of students who first began postsecondary education during the 2019-20 academic year (full-scale), when the coronavirus pandemic began. The impacts of this event on education have been substantial and BPS:20/25 is uniquely positioned to provide longitudinal data on the experiences of students from year one of the pandemic through six years later, to enable researchers to examine enrollment, persistence, attainment, educational experiences, and employment outcomes for a cohort of students whose postsecondary education began during an unprecedented and far-reaching event.

As demographics change in the U.S., policymakers and practitioners are increasingly concerned about the difference between who attains postsecondary credentials and who does not. BPS:20/25 will be able to provide the latest nationally representative numbers on how key populations are entering and faring in postsecondary education, particularly students from low socioeconomic and minority backgrounds. These data will allow researchers and policymakers to explore the factors related to populations experiencing greater success on persistence, attainment, and labor market outcomes.

Policymakers and researchers are also focused on how the education and employment outcomes of students are shaped by the control and level of the institution they attend. For example, the U.S. Department of Education manages the College Scorecard, a web tool designed to publicize key metrics about student outcomes such as graduation rate and average salary after graduation across a variety of institution types so students and families can make more informed college choice decisions. By providing the sample size and key student- and institution-level measures for these analyses, BPS:20/25 enables researchers and policymakers to analyze students' attainment and employment by sector, while also controlling for other variables that may be related to these outcomes.

The cost of college, the percentage of students borrowing, and the amounts borrowed have increased since the last BPS cohort started postsecondary education in 2011-12. As a result, the impact of college costs, financial aid, and student loans on students' ability to complete credentials is an ever more pressing issue. In recent years, Pell Grant eligibility has been expanded, and the amount of the grant increased. There have also been changes in state-based aid programs. BPS:20/25 can help inform these policy decisions by providing data on how grants, and other financial aid, impact students' road to a credential.

Finally, researchers and policymakers are interested in how attainment and employment are affected by several aspects of the postsecondary experience, such as remedial education, online education, and employment while in school. Students' lack of college readiness and need for remedial or developmental education have been identified as impediments in students' time to degree, as well as factors in students dropping out without a credential. In fact, the Department of Education launched a new Center for the Analysis of Postsecondary Readiness to strengthen the research, evaluation, and support of college readiness efforts across the nation. BPS includes information on high school course taking, grades, and test scores as well as developmental course taking in different subjects while in

college, which can provide key data for the Center's work. The growth of online courses and degree programs has also attracted attention, with researchers and practitioners wanting to better understand its potential in speeding students' time to degree and the ways such courses and programs are perceived by employers. The degree to which working while enrolled helps or hurts postsecondary attainment, time to degree, and later employment outcomes is a key debate. Through the information collected on employment history, BPS:20/25 will be able to add data to this discussion.

b. BPS:20/25 Research and Policy Issues

Following are some of the many research and policy issues to be addressed with BPS:20/25 data:

Postsecondary Enrollment Characteristics and Experiences

- How are FTB students distributed across institutions of varying control and levels, and different degree programs?
- What fields of study do FTB students pursue, and in which fields do they obtain degrees?
- How frequently do FTB students change their field of study, particularly from science, technology, engineering, and mathematics (STEM) to non-STEM fields and vice versa?
- To what extent do FTB students participate in online courses and programs?
- What enrollment patterns were evident for FTB students who were affected by the coronavirus pandemic?
- How do answers to the above questions differ by factors like demographic characteristics, control and level of institution, and field of study?

Employment During Enrollment

- What percentage of students work while enrolled, and how many hours do they work?
- How do students' individual patterns in working while enrolled change by year of enrollment and U.S. economic conditions?
- How do answers to the above questions differ by factors like demographic characteristics, control and level of institution, and field of study?

Financial Aid and Borrowing

- How much financial support do dependent FTB students receive from their parents or other relatives and friends for their postsecondary education?
- What proportion of FTB students receive federal Pell Grants, veterans benefits, or other Department of Defense education benefits?
- What proportion of FTB students take out private loans, and in what amount?
- How does the percentage of FTB students taking out federal loans and the average amount borrowed vary by demographic and enrollment characteristics?
- How does the amount of grants and loans FTB students receive from federal, institutional, and private sources differ during each year of enrollment?
- What kinds of borrowers struggle in repayment and default on their student loans after 6 years?
- How do answers to the above questions differ by factors like demographic characteristics,

control and level of institution, and other enrollment characteristics?

Education and Career Expectations

- What is the relationship between degree or certificate attainment expectations and actual attainment outcomes 6 years after students begin college?
- How much social and emotional support do FTB students receive from their families and friends in their pursuit of their educational goals?
- Did the coronavirus pandemic lead students to change their programs of study?
- To what careers do FTB students aspire, and what do they think they will earn in these positions?
- How close are students' predicted earnings to actual average earnings in their expected careers?
- How do answers to the above questions differ by factors like demographic characteristics, control and level of institution, and other enrollment characteristics?

Persistence

- At what rate do students stop out of postsecondary education, how many times do they stop out, and when do they stop out?
- At what rate do students transfer between institutions, when do they transfer, and what are the most common transfer patterns in terms of the types of institutions left and entered?
- What proportion of certificate attainers enter another certificate or degree program? Are their subsequent certificates and degrees in related fields of study?
- What proportion of FTB students are enrolled in their first institution 6 years after initially enrolling but have yet to earn a credential?
- What proportion of FTB students are enrolled in any institution 6 years after first enrolling but have yet to earn a credential?
- Among students who leave postsecondary education without a credential, in what year did they leave?
- How do answers to the above questions differ by demographic characteristics, high school preparation, control and level of institution, attendance intensity, employment during enrollment, financial aid and borrowing, physical and mental health, sense of belonging at institution, discount rate, and education and career expectations?

Attainment

- What percentage of FTB students earn a certificate, associate's degree, or bachelor's degree?
- How long does it take FTB students to earn each of these credentials?
- How do answers to the above questions differ by institution level and control, attendance intensity, transfer patterns, stop-outs, changes in major and major choice? What roles do demographic characteristics, high school preparation, employment during enrollment, financial aid and borrowing, physical and mental health, sense of belonging at institution, discount rate, and education and career expectations play?

Employment Outcomes After Leaving Postsecondary Education

- How much do FTB students earn after 6 years, and what benefits do they receive?
- What percentage of FTB students are employed in their field of study? How do their employment outcomes compare to those who are not employed in their field of study?
- Among FTB students who did not enter postsecondary education directly from high school to what extent does their employment before and after postsecondary education differ? To what extent does employment prior to postsecondary education influence employment outcomes after postsecondary education?
- How do FTB students' employment outcomes after leaving postsecondary education compare to their employment during their postsecondary education?
- What percentage of FTB students have experienced unemployment spells? How many spells have they had, and how many months has each spell lasted?
- How do answers to the above questions differ by degree and certificate attainment; field of study; and level, control, and selectivity of institution attended? What role do demographic characteristics, employment prior to and during postsecondary enrollment, debt, and earlier education and career expectations play?

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

<https://nces.ed.gov/pubsearch/>.

3. Use of Information Technology

The BPS:20/25 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.

The website used for the BPS:20/25 data collection will reside on NCES' FIPS Moderate servers. Secure Socket Layer (SSL) protocol is used to encrypt the data transmitted over the Internet, the survey data is encrypted at rest and all parts of the websites that collect student data are password protected. On a nightly basis, the data collection contractor will download student survey data 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 data collection contractor maintains Authority To Operate (ATOs) with OCIO for the systems associated with the processing of data collected at NCES.

4. Efforts to Identify Duplication

Efforts to identify duplication have included NCES consultations with other federal offices, such as the U.S. Department of Education's Office of Postsecondary Education; the Office of Planning, Evaluation, and Policy Development; and other agencies, such as the Government Accountability Office; the Congressional Budget Office (CBO); and the Office of Management and Budget (OMB). In addition, NCES collaborates with the National Center for Science and

Engineering Statistics (NCSES) at the National Science Foundation (NSF) to ensure that each unit is kept up to date on each other's studies pertaining to postsecondary students and institutions. NCES and NSF meet on a regular basis to cover topical issues relevant to both offices, and each has staff serving on study TRPs. NCES routinely consults with nonfederal associations, such as the American Council on Education, the Career Education Colleges and Universities, the National Association of Student Financial Aid Administrators, the National Association of Independent Colleges and Universities, the Council of Graduate Schools, the Institute for Higher Education Policy, the State Higher Education Executive Officers Association, and the National Association of State Student Grant and Aid Programs to confirm that data collected through NPSAS and BPS are not available from any other sources.

NCES also consults with academic researchers, several of whom attend the NPSAS and BPS 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 BPS will meet the needs of the federal government and relevant organizations. No studies in the United States singularly duplicate the data produced by BPS.

5. Method Used to Minimize Burden on Small Businesses

The target respondents for BPS:20/25 interviews are individuals, and the data collection activities will not involve burden to small businesses or entities.

6. Frequency of Data Collection

BPS studies have been conducted periodically since 1990. BPS:20/22 was the first follow-up data collection following NPSAS:20, which served as the base-year, and from which the BPS student sample was selected. BPS:20/25 will be the second follow-up.

NPSAS and its longitudinal spin-off studies, BPS and B&B, are conducted to reflect the large-scale and rapid changes in federal policy concerning postsecondary student aid. A recurring study is essential, first, to help predict future costs for financial aid because loan programs create continued obligations for the federal government as long as the loans are being repaid. Second, repeated surveys can capture the changing nature of the postsecondary environment. With the longitudinal design of the NPSAS survey and BPS follow-ups, representative national samples of FTB students with similar base-year characteristics may be compared over time to determine the effects of changes in federal policy and programs. Third, repeated surveys can help researchers understand the effect of economic conditions on the employment outcomes for subbaccalaureate educational certificate holders.

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).

Historically, BPS has not collected race and ethnicity data. As seen in Table 1, BPS:20/25 is the second (and currently planned as the final) follow-up data collection with the NPSAS:20 study cohort. Because it is a follow-up study, BPS has utilized the race and ethnicity data provided in the base-year NPSAS administration. However, given the revised SPD15 standard, collecting race and ethnicity using the modified categories would provide insight to NCES about how postsecondary students respond to these questions, and obtain methodological data about the impact that this new version may have on future postsecondary student demographic estimates. To minimize respondent burden and programming requirements, the race and ethnicity question with minimum categories and examples will be fielded (see Figure 2 from 89 FR 22182). The resulting methodological data will allow for concordance analyses across NPSAS:20 and BPS:20/25 data and the examination of endorsement rates for new or modified categories, such as Middle Eastern or North African and Hispanic or Latino. However, any data or findings published from BPS:20/25 will be stratified and analyzed based on the original race and ethnicity standards under which the base-year NPSAS:20 study collected data.

The most recent NPSAS:2024 data collection package cleared by OMB (OMB#1850-0666 v.38) described at a high level NCES's plans for NPSAS to be compliant with the newly published SPD15 standards by the next student data collection for NPSAS.

8. Consultants Outside the Agency

Recognizing the significance of the BPS:20/25 data collection, several strategies have been incorporated into the project work plan to create opportunities 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 BPS implementations have benefited from consultations with 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 (a list of the TRP attendees is provided in Appendix A). 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 BPS will meet the needs of the federal government and relevant organizations.

In May 2019, members of the NPSAS:20 TRP were consulted regarding specific questions included in the NPSAS:20 student survey that were targeted to the BPS cohort. In June 2020, the BPS TRP reviewed the BPS:20/22 field test plan and content of the student survey. In July 2021, a second BPS TRP meeting was held to review the field test results and collect recommendations for the full-scale collection. In June 2023, the BPS TRP reviewed the

BPS:20/25 field test plan and content of the student survey. In July 2024, a final BPS TRP was held to review the field test results and collect recommendations for the full-scale collection.

9. Provision of Payments or Gifts to Respondents

The use of incentives to motivate completion of the student survey can provide significant advantages to the government in terms of higher quality data with increased response rates and 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.

The monetary incentives for respondents are valued at \$30-\$65. The BPS:20/25 full scale data collection will involve two distinct data collection groups and three main data collection phases. This general setup builds upon the designs implemented in other longitudinal studies where it has contributed to maximizing response rates and minimizing the potential for nonresponse bias (e.g., BPS:20/25 field test, BPS:20/22, BPS:12/14, BPS:12/17, B&B:16/17, B&B:08/18).

The BPS:20/25 full-scale study plans include differential treatments based on prior round response status, an approach that was successfully implemented in the B&B:16/17 field test, where NPSAS:16 field test nonrespondents received either an aggressive or a default protocol. The response rate among NPSAS:16 field test nonrespondents who received the aggressive protocol was about 12 percentage points higher than the group that received the default protocol (37 percent; default 25 percent response rate $t(2,097) = 3.52, p < .001$).

For the BPS:20/25 full-scale design, we will distinguish the following data collection groups and design protocols:

- Default Group: Any sample member who responded to all NPSAS:20 and BPS:20/22 survey requests ($n = 20,620$), including:
 - o NPSAS:20 and BPS:20/22 survey respondents, excluding sample members who only partially completed the BPS:20/22 survey (final partials) .
 - o NPSAS:20 administrative-only cases who were also BPS:20/22 survey respondents, excluding BPS:20/22 final partials.
- Aggressive Group: NPSAS:20 survey nonrespondents, BPS:20/22 survey nonrespondents, or BPS:20/22 final partials ($n = 8,030$).

The baseline incentive for the prior round respondents in the default group will be \$30. Including a \$10 boost postpaid incentive around week 11 (see incentive boosts section below) yields an incentive range of \$30 to \$40 for sample members in the default group.

The baseline incentive for sample members in the aggressive group will be \$45. Including a \$20 boost postpaid incentive around week 11 yields an incentive range of \$45 to \$65 in the aggressive data collection protocol.

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.

An increased baseline incentive for the aggressive group versus the default group is motivated by an experiment conducted in BPS:12/14 showing that a \$45 baseline incentive yielded the highest response rates. However, the experiment was underpowered to detect differences from \$30 in the lower propensity response groups (Wilson et al. 2015). Nonetheless, the \$30 baseline incentive offered to these sample members in prior studies was not sufficient to encourage response (i.e., $n = 50$ NPSAS:20 field test nonrespondents and $n = 623$ BPS:20/22 field test nonrespondents). Therefore, we recommend implementing a higher baseline incentive given that the \$30 baseline incentive was not enough to encourage these sample members to respond in prior years. Further, the \$40 BPS:20/22 field test incentive yielded a completion rate of only 25 percent among sample members in the aggressive group, while a \$45 baseline incentive for the aggressive group yielded a completion rate of 38 percent in the BPS:20/22 full-scale and a 41 percent completion rate in the BPS:20/25 field test. Data collection results from the BPS:20/25 field test are discussed further in Appendix D.

Researchers have used incentive boosts as a nonresponse conversion strategy for sample members who have implicitly or explicitly refused to complete the survey (e.g., Groves and Heeringa 2006; Singer and Ye 2013). These boosts are especially common in large federal surveys during their nonresponse follow-up phase (e.g., The Center for Disease Control and Prevention's National Survey of Family Growth) and have been implemented successfully in other postsecondary education surveys (e.g., BPS:12/17; NPSAS:20). In NPSAS:20, a \$10 incentive boost increased the overall response rate by about 3.2 percentage points above the projected response rate. Therefore, a \$10 incentive boost increase to the BPS:20/25 baseline incentive is planned during the nonresponse follow-up phase for all remaining nonrespondents in the default data collection group. Remaining nonrespondents in the aggressive data collection group will be offered a \$20 incentive boost increase to the baseline incentive. This is because the \$10 incentive boost in NPSAS:20 did not show any effect on this group. If necessary, incentive boosts may be targeted only at certain groups of nonrespondents to achieve response goals (e.g., targeting nonrespondents from certain states to ensure representativeness, targeting aggressive group nonrespondents to reduce the potential for nonresponse bias). For additional details about the incentive plan, see B.4.

Prior to the start of data collection, BPS:20/25 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 BPS:20/25 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, BPS:20/25 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 BPS:20/25 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 BPS:20/25 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 BPS:20/25 procedures for maintaining confidentiality include notarized nondisclosure affidavits obtained from all personnel who will have access to individual identifiers; personnel training regarding the meaning of confidentiality; controlled and protected access to computer files; built-in safeguards concerning status monitoring and receipt control systems; and a secure, staffed, in-house computing facility. BPS:20/25 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. To access restricted pages containing confidential information, website users will be required to log in by entering an assigned ID number and password.

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

The Department 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.

Administrative data

BPS:20/25 and other NCES postsecondary studies include data linkages with many existing sources of valuable data, listed in appendix B, including the Department of Education's FAFSA Processing System (FPS), National Student Loan Data System (NSLDS), and National Student Clearinghouse (NSC). These NCES studies also obtain data from postsecondary institution student records, information on military service records from Veterans Benefits Administration (VBA), and admissions test scores from ACT and The College Board. Linkages to additional data providers, such as Experian and the National Directory of New Hires (NDNH), may be explored for BPS:20/25. 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.

Regarding file matching with administrative sources, the Family Educational Rights and Privacy Act (FERPA, 34 CFR Part 99) allows the disclosure of personally identifiable information from students' education records without prior consent for the purposes of BPS:20/25 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."

BPS:20/25 is collecting data under the Secretary's authority. Specifically, NCES, as an authorized representative of the Secretary of Education, is collecting this information for the purpose of evaluating a federally supported education program. Any personally identifiable information is collected with adherence to the security protocol detailed in 34 CFR §99.35:

"(a)(1) Authorized representatives of the officials or agencies headed by officials listed in §99.31(a)(3) may have access to education records in connection with an audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs.

(2) The State or local educational authority or agency headed by an official listed in §99.31(a)(3) is responsible for using reasonable methods to ensure to the greatest extent practicable that any entity or individual designated as its authorized representative—

- (i) Uses personally identifiable information only to carry out an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements related to these programs;
- (ii) Protects the personally identifiable information from further disclosures or other uses, except as authorized in paragraph (b)(1) of this section; and
- (iii) Destroys the personally identifiable information in accordance with the requirements of paragraphs (b) and (c) of this section.

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

- (1) Be protected in a manner that does not permit personal identification of individuals by anyone other than the State or local educational authority or agency headed by an

official listed in §99.31(a)(3) and their authorized representatives, except that the State or local educational authority or agency headed by an official listed in §99.31(a)(3) may make further disclosures of personally identifiable information from education records on behalf of the educational agency or institution in accordance with the requirements of §99.33(b); and

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

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

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

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

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

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

Appendix B includes additional information regarding confidentiality for administrative record matching.

Student

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

NCES is authorized to conduct the 2020/25 Beginning Postsecondary Students Longitudinal Study (BPS:20/25) 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 1850-0631. 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 2020/25 Beginning Postsecondary Students Longitudinal Study (BPS:20/25) Full-scale, National Center for Education Statistics, Potomac Center Plaza, 550 12th St., SW, Room 4037, Washington, DC 20202. OMB Clearance No: 1850-0666 Expiration Date: xx/xx/xxxx

11. Sensitive Questions

The BPS survey collects information about earnings, assets, marital and family statuses, gender identity and sexual orientation, student basic needs, and mental health. 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).

The collection of data related to income, earnings, assets, indebtedness, and employment outcomes is central to understanding key policy issues driving this study. Financial assets and obligations are important post-graduate outcomes of students and are indicators of the rate of return of educational experiences to the respondent.

The collection of information about marital and family status likewise facilitates the exploration of key policy issues. Financial and family-related obligations also influence decisions about enrollment, employment, and loan repayment so it is important to collect information about marital status and dependents. Gender identity and sexual orientation can impact enrollment and employment experiences and outcomes, a topic of growing

interest for social research and policy.

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 conduct policy-related analyses and to model and project the effects of federal program changes on students and program costs.

Data elements capturing food and housing security are critical to measure how well the basic needs of postsecondary students are being met. The NPSAS:20 student survey, which served as the base-year data collection for BPS:20/25, was the first federal survey to collect food security data on a national postsecondary student population. Homelessness is one indicator of housing security, which is a multidimensional construct. To capture more nuanced information on student housing security, the BPS:20/22 survey collected indicators of housing security such as housing affordability, stability, and safety. These indicators will also be collected in BPS:20/25 and allow researchers to understand the impact that housing security can have on student persistence and attainment and other outcomes of interest.

12. Estimates of Response Burden

Table 2 provides the projected estimates for response burden for the BPS:20/25 full-scale study, which are based on NPSAS:20 and BPS:20/22. We expect the student survey to require approximately 30 minutes, on average, for completion. Estimating an average hourly rate of \$37² for participating students, the 9,010 total burden hours are estimated to translate to \$333,370 total burden time cost to respondents.

Table 2. Average estimated burden to respondents for the BPS:20/25 full-scale data collection

Data collection activity	Sample (Fielded Cases Only)	Expected eligible	Expected response rate (percent)	Expected number of respondents	Expected number of responses	Average time burden per response (mins)	Total time burden (hours)
BPS:20/25 Full-scale							
Student survey							
Full	28,650	28,650	56	16,020	16,020	30	8,010
Abbreviated	28,650	28,650	14	4,000	4,000	15	1,000
Total			70	20,020	20,020		9,010

* Unduplicated count of respondents.
NOTE: Sample sizes rounded to the nearest 10. Percentages are based on the unrounded count of expected eligible students within the row under consideration. Detail may not sum to totals because of rounding.

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 all full-scale activities included in this package is \$4,597,000.

² The hourly rate of \$37 for students was obtained by averaging the median weekly earnings of full-time wage and salary workers among high school graduates with no college (\$916) and individuals with a bachelor’s degree (\$1684) and dividing by 35 hours per week (<http://www.bls.gov/news.release/pdf/wkyeng.pdf>); accessed on August 9, 2024.

Table 3. Costs to NCES for BPS:20/25 Full-scale Study

BPS:20/25 study implementation	Costs to NCES
Total	\$4,597,000
NCES Salaries and expenses	\$330,000
Contract costs	
Full-scale total	\$4,267,000
Instrumentation and materials	\$867,000
Data collection	\$2,509,000
Systems and data processing	\$891,000

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 BPS:20/25 field test study.

16. Publication Plans and Time Schedule

The contract for BPS:20/25 requires multiple reports, publications, and other public information releases. The operational schedule for the BPS:20/25 full-scale study is seen in Table 4 below.

Table 4. Operational Schedule for BPS:20/25 Full-scale Study

BPS:20/25 activity	Start date	End date
Full-scale collection		
Select student sample	October 2024	December 2024
Survey data collection	February 2025	October 2025
Process data, construct data files	February 2025	November 2025
Prepare/update data collection reports	February 2025	November 2025

The following BPS:20/25 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;
- complete data files and documentation for research data users in the form of 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 allows users to create their own tables and charts using all publicly available variables; 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.