2012/14 Beginning Postsecondary Students Longitudinal Study: (BPS:12/14)

Supporting Statement Part A
Request for OMB Review
OMB # 1850-0631 v.8

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

October 24, 2013
Revised May 28, 2014

Contents

List of Tables

Appendices

A. Justification

1. Circumstances Making Collection of Information Necessary

a. Purpose of this Submission

The National Center for Education Statistics (NCES), within the U.S. Department of Education (ED), Institute of Education Sciences, is requesting clearance for data collection materials and procedures for the full-scale collection of the 2012/14 Beginning Postsecondary Students Longitudinal Study (BPS:12/14) first follow-up, including the student interview and panel maintenance activities. In 2013, NCES received clearance of the BPS:12/14 field test data collection that was conducted in the spring of 2013. The materials to be used in the main study are based upon those that were approved in February 2013 for the field test data collections (OMB# 1850-0631 v.7). With that submission, NCES adequately justified the need for and overall practical utility of the full study as proposed and an overarching plan for the phases of the data collection over the next 3 years, and provided as much detail on the measures to be used as was available at the time of the submission. OMB approved the initial phase of this collection in February 2013, and now NCES published a notice in the Federal Register allowing a 30-day public comment period on the details of the subsequent study components (full-scale first follow-up) described in this submission.

The BPS longitudinal study is designed to follow a cohort of students who enroll in postsecondary education for the first time during the 2011/12 academic year, irrespective of date of high school completion. The study collects student data on 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. 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 employment and wage outcomes are for certificate and degree attainers, and why students leave school.

This study is being conducted under contract # ED- IES-09-C-0039 with RTI International (a trade name of Research Triangle Institute), as well as Coffey Consulting, LLC, Branch Associates, Research Support Services, and consultants Dr. Cynthia Decker and Ms. Andrea Sykes.

b. Summary of Study Design for BPS:12/14

The BPS:12/14 full-scale sample will consist of students eligible to participate in the NPSAS:12 full-scale study, who first began postsecondary education at U.S. institutions during the 2011–12 academic year. The BPS:12/14 student interview, for which clearance is requested, will involve a web-based interview conducted in two separate substudies. The first, a calibration study, will evaluate optimal incentive amounts for use in the baseline and second phase of the responsive design plan for the main full-scale data collection. About 10 percent of the BPS full-scale sample will be randomly selected to participate in the calibration study, with data collection beginning in mid-February. The second, main study will collect data from the remaining sample in 6 phases involving different incentive amounts (agreed upon with NCES and OMB based on the results of the calibration), field interviewing and/or local exchange calling, and a mobile-enabled abbreviated interview. Each intervention has been selected to address a different reason for non-response.

Additional data for the BPS:12/14 full-scale student sample will be obtained from a variety of administrative data sources. Student financial aid data will be matched and downloaded from the Central Processing System (CPS), which houses and processes data contained in the Free Application for Federal Student Aid (FAFSA) forms. Data will also be obtained from the National Student Loan Data System (NSLDS), which contains both federal Pell Grant and Stafford Loan data, and the National Student Clearinghouse (NSC) containing enrollment and degree attainment information provided by participating institutions. A description of linkages to these administrative data sources can be found in Appendix A, and the security measures in place for these linkages are provided in Appendix B.

During full-scale data collection, an additional data source may be available from student records abstracted from institutions attended by members of the BPS:12 cohort. The approach for abstraction of institution records has recently been tested as part of the Education Longitudinal Study:2002 (ELS:2002) Third Follow-Up (OMB #1850-0652 v.10). Although concurrent or contemporaneous collections of similar data (e.g., in NPSAS) have been successful for the purpose of determining how students pay for their postsecondary education in the current academic year, the ELS:2002 Financial Aid Feasibility Study (FAFS) assesses the practicability of collecting the data retrospectively, with records that go back as far as 2004. Results of the ELS:2002 FAFS are currently being evaluated,

ELS:2002 institutions were asked to provide a borrowing history for a 3-year period within the entire tenure of the identified ELS:2002 students who attended their institution. Longitudinal analysis of student financial aid records will allow examination of borrowing and debt trends over time, as well as the effects of those trends on postsecondary persistence and attainment, and decisions about work and family. The results of the feasibility study are helping provide information about the quality of the data when collecting financial aid student records that span a number of years and, ultimately, inform decisions on such efforts for the BPS first and second follow-up studies which would require retrospective collection to 2011-12. Once this additional collection is funded, a separate forms clearance package will be submitted for future BPS follow-ups.

c. Legislative Authorization

The BPS longitudinal study is authorized by the Education Sciences Reform Act of 2002 (ESRA), 20 U.S.C. § 9543) and is being conducted in close consultation with other offices and organizations within and outside the U.S. Department of Education (ED).

2. Purpose and Uses of the Data

a. The BPS Cohort

BPS is unique as the only nationally-representative study of all students –including nontraditional students who delayed postsecondary entry and those in short-term vocational programs – beginning postsecondary education for the first time in the same academic year. It is also the only study that follows students throughout the entire postsecondary education system over a number of years. As a result, it provides a much more accurate portrait of these students' persistence, attainment, and experiences than do studies that focus only on the first institution or rely on institution-reported data alone.

BPS:12/14 will provide data on 2011-12 beginning postsecondary students in their first 3 years after entering postsecondary education. Because current economic conditions have increased interest in the relationship between subbaccalaureate credentials and employment outcomes, for the first time, BPS features an oversample of students seeking educational certificates in 2-year public, 2-year for-profit, and 4-year for-profit institutions. A recent NCES report used BPS:04/09 data to examine subbaccalaureate completers and noncompleters' labor market outcomes[1] but, due to small samples, was often unable to detect significant differences among certificate seekers. Analyses of students' labor market outcomes will be aided by BPS:12/14's expanded employment section, which will collect an employment history on all jobs held by respondents since starting postsecondary education. For those who have already left postsecondary education, with or without earning a credential, greater detail will be collected on specific jobs held.

In addition to post-enrollment employment, BPS provides data on beginning students' demographics, high school preparation, enrollment and employment while enrolled, financial aid and borrowing, and education and career expectations. The primary purpose of BPS is to contribute to a better understanding of how these factors relate to three key postsecondary outcomes: persistence, degree attainment, and employment. To this end, BPS:12/14 will prepare multiple publications that will report key statistics on how students with varying characteristics performed on these outcomes 3 years after starting their postsecondary careers; the later BPS second follow-up study (BPS:12/17) will explore these outcomes over a longer period of time.

b. Current Research and Policy Issues Related to BPS

To facilitate understanding of the relationships among the key BPS outcomes, the BPS:12 longitudinal study has adopted the human capital model as its research framework, and now incorporates several new sets of questions that the latest research suggests will be helpful in predicting the outcomes of interest. These questions include students' earnings potential given current education, their earnings expectations after completing the postsecondary credential, the extent to which they prefer current over future rewards (also known as their discount rate), and their physical and emotional health.

As a major longitudinal data collection, BPS:12 will continue to provide timely data in several areas of policy interest. For example, the President's American Graduation Initiative has set ambitious goals to increase Americans' postsecondary education attainment over the next decade. As a result of that and other related initiatives, more students are being encouraged to enroll. At the same time, the economic downturn has resulted in higher enrollments and a shift in the composition of new postsecondary enrollees. BPS allows researchers to describe these changing enrollment patterns and examine their relationship with students' postsecondary persistence, degree attainment rates, and employment outcomes.

BPS data will also contribute to our understanding of the relationship between the attainment of a postsecondary credential and job prospects which, since the advent of the Great Recession, continues to be prominent in the national conversation. In his first State of the Union address, President Obama called for every American to take at least one year of education beyond high school—including postsecondary occupational education – and to consider their potential earnings in choosing a college. In addition, the Administration plans to include information on employment and earnings in its College Scorecard in

[1] http://nces.ed.gov/pubs2012/2012273.pdf

order to help students at all levels of postsecondary education better understand the relationship between education and employment.

Focusing specifically on STEM fields, the White House's Engage to Excel initiative seeks to produce one million additional college graduates in STEM to fill the projected gaps in America's workforce. One of its primary goals is to increase the number of students who choose STEM majors and retain them through receipt of a postsecondary degree, with a special focus on engaging them during the first 2 years of a STEM-related degree program. Data from the BPS:12 cohort will permit estimation of overall changes in rates of degree attainment and major field of study, particularly with respect to majors in science, technology, engineering, and mathematics (or STEM).

With respect to subbaccalaureate credentials, a report from the Georgetown Center on Education and the Economy (Carnevale et al, 2012)[2] notes that certificates "provide the outcomes that degree-seeking students are looking for: gainful employment," (p. 35) and can serve as gateways to higher level college credentials. Because there is a particular paucity of information on the labor market value of non-degree credentials, including industry-recognized certifications, occupational licenses, and subbaccalaureate educational certificates, the BPS:12 cohort includes an oversample of students who entered postsecondary education seeking to attain a subbaccalaureate certificate. In addition, BPS is coordinating with the Interagency Working Group on Expanded Measures of Enrollment and Attainment (GEMEnA) to improve federal statistical data on these credentials.

Tuition costs, financial aid, and student debt are also receiving considerable attention from lawmakers. To help address these issues, the Obama Administration recently announced its desire to incorporate performance-based funding into federal financial aid programs, with colleges rated on affordability, completion rates, and graduates' earnings. New gainful employment regulations seek to ensure that students are able to obtain jobs and earn incomes in their chosen professions that allow them to repay their loans. BPS provides a considerable amount of data related to these topics. To further inform debates on changing the financial aid system, BPS will obtain institution-level information about how students are paying for their postsecondary education beyond the first year. This new data collection effort will provide greater insight into the extent to which college costs, financial aid, and debt over time are related to persistence, attainment, and employment outcomes.

Some of the many research and policy issues to be addressed with BPS:12/14 data include the following:

Persistence

- What proportion of beginning students are enrolled in their first institution and what proportion are enrolled at any institution 3 years after initially enrolling?
- How frequently are students no longer enrolled anywhere after 3 years, and how long had such students been enrolled before they left?
- What is the rate at which 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?

[2] Carnevale, Anthony P., Rose, Stephen J., and Hanson, Andrew R. (2012) Certificates: Gateway to Gainful Employment and College Degrees. Washington, DC: Georgetown Center on Education and the Economy.

– To what extent do students change their major from STEM to non-STEM fields, and vice versa?

– What proportion of certificate attainers enters another certificate or degree program? Are their subsequent certificates and degrees in related fields of study?

– How do the above persistence questions differ by demographic characteristics, high school preparation, enrollment, employment during enrollment, financial aid and borrowing, and education and career expectations? In particular, how are high school preparation and institution type related to attainment?

Postsecondary Enrollment Characteristics and Experiences

– How are beginning postsecondary students distributed across different types of institutions? Across different degree programs?

– What fields of study do beginning postsecondary students pursue, and in which do they obtain degrees?

– To what extent do students participate in online, night, and weekend courses and programs, and how does participation differ by demographic characteristics, type of institution attended, and field of study?

– To what extent do students feel a sense of belonging at their institution and how is this related to their demographic characteristics and other enrollment characteristics and experiences? How is this sense of belonging related to academic and employment outcomes?

Employment during Enrollment

– What percentage of students work while enrolled, and of them, what proportion have a job related to their field of study?

– Of those who work while enrolled, do they work on or off campus and how many hours per week do they work?

Financial Aid and Borrowing

– What types of financial support do dependent beginning students receive from their parents and other relatives and friends during their postsecondary education?

– What proportion of beginning postsecondary students receives federal Pell Grants or veterans or other Department of Defense education benefits? What proportion of students borrows private loans, in what amount, and how does this borrowing vary by demographic characteristics and institution type?

– How does the percentage of beginning students taking out federal loans and the average amount borrowed vary by demographic and enrollment characteristics?

– What is the amount of federal loan debt students acquire and how does this differ by students' demographic, high school preparation, and enrollment characteristics?

– What is the average cumulative debt of beginning students after 3 years and what factors are related to the amount owed?

– What kinds of borrowers struggle in repayment and default on their student loans after 3 years?

Attainment

- What percentage of beginning students earn a certificate or associate's degree within 3 years?
- How long does it take beginning students to earn these credentials?
- To what extent are demographic characteristics, high school preparation, enrollment, employment during enrollment, financial aid and borrowing characteristics, and education and career expectations linked to attainment and time to attainment? In particular, how are institution type, transfer patterns, and debt related to attainment?

Education and Career Expectations

- What degrees or certificates do students expect to attain, when do they expect to complete them, and how confident are they in these expectations?
- How much support do beginning students receive from their families and friends in their pursuit of their educational goals?
- To what positions do beginning 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?
- What would beginning students do if they were not in school, and if they thought they would be working, what did they think they would be earning?
- What is students' discount rate, or, phrased another way, how large a premium do beginning postsecondary students place on more immediate versus more remote rewards?

Employment Outcomes after Leaving Postsecondary Education

- Among beginning students who have left postsecondary education, what percentage has experienced unemployment spells? How many spells have they had and how many months has each spell lasted?
- How much do beginning students who have left postsecondary education earn, and what benefits do they receive?
- What are certificate attainers' employment outcomes? What percentage is employed in their field of study? How do their employment outcomes compare to those who are not employed in their field of study? In what occupations are these students employed, and do their occupations align with their field of study?
- Among beginning postsecondary students who did not enter postsecondary education directly from high school and who left postsecondary education within 3 years, to what extent does their employment before and after postsecondary education differ? To what extent does employment prior to postsecondary education contribute to employment outcomes after postsecondary education?
- How do the answers to this set of questions differ by demographic characteristics, high school preparation, enrollment, employment during enrollment, financial aid and borrowing, and education and career expectations as well as persistence and attainment?

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.

c. Previous Agency Use of the Data

NCES has used data from the previous cycles of BPS in a variety of publications. NCES also makes BPS data available for use by researchers via both restricted-use data files and the public-use data tools, PowerStats and QuickStats. Appendix C provides a bibliography of publications using BPS data, including peer-review journal publications prepared by researchers using these data.

3. Use of Information Technology

To improve the efficiency of student data collection, BPS:12/14 will use web-based student interviewing across two modes of data collection, self-administered surveys and computer-assisted telephone interviewing (CATI). In the NPSAS:12 and the BPS:12/14 field test, 80.6 percent and 83.3 percent of interviews, respectively, were completed online as self-administered surveys. The abbreviated interview will be developed to be mobile-friendly, allowing respondents to complete the interview on a tablet or, if desired, a smartphone.

4. Efforts to Identify Duplication

Efforts to identify duplication have included NCES consultations with other federal offices, such as ED's Office of Postsecondary Education, the Office of Planning, Evaluation and Policy Development, the National Science Foundation, the Congressional Budget Office, and the Office of Management and Budget. NCES also routinely consults with non-federal associations such as the American Council on Education, the Association of Private Sector Colleges and Universities, the National Association of Independent Colleges and Universities, and the Institute for Higher Education Policy to confirm that the data to be collected for the BPS longitudinal study are not available from any other sources. Academic researchers are also consulted, with several attending Technical Review Panel meetings along with representatives from federal agencies, associations, and postsecondary institutions. Beyond identification of duplication, these consultations provide methodological insights from the results of other longitudinal postsecondary student studies conducted by NCES and other federal agencies and nonfederal sources, and the consultations assure that the data collected through BPS will meet the needs of the federal government and other relevant organizations. There are no other studies in the U.S that duplicate the data produced by BPS.

BPS is one of several studies sponsored by the U.S. Department of Education to respond to the need for a national, comprehensive database concerning significant issues in access, choice, enrollment, persistence, progress, and attainment in undergraduate postsecondary education, in graduate and professional school access, and in post-enrollment experiences. The base study for BPS is the National Postsecondary Student Aid Study (NPSAS), a recurring survey of a nationally representative, cross-sectional sample of postsecondary students. The NPSAS surveys have been implemented every 3 to 4 years since 1986–87.

There are three previous cohorts of the Beginning Postsecondary Students (BPS) Longitudinal Study: BPS:90, BPS:96, and BPS:04. The BPS:12 cohort was identified from NPSAS:12 just as the previous BPS cohorts, and the Baccalaureate and Beyond (B&B) study cohorts, have originated from prior NPSAS studies. Unlike BPS, which follows a cohort of first time beginning students at institutions at all levels of postsecondary education, B&B follows a cohort of baccalaureate recipients at institutions awarding 4-year degrees and above. As the B&B cohort is necessarily made up of degree recipients, persistence in undergraduate education is not an emphasis in B&B, as it is in BPS. Additionally, B&B places a special emphasis on the experiences of new elementary and secondary teachers. The chronology of the previous administrations of the NPSAS study and its associated BPS and B&B longitudinal components are presented in table 1.

There have been a number of related studies to BPS. For example, NCES has conducted high school cohort studies, such as *High School and Beyond* (HS&B), the *National Longitudinal Study of the High School Class of 1972* (NLS-72), the *National Education Longitudinal Study of 1988* (NELS:88), the *Education Longitudinal Study of 2002* (ELS:2002), and the *High School Longitudinal Study of 2009* (HSLS:09), which follow or plan to follow students into college. While these studies accurately reflect the education and employment experiences and outcomes of the high school cohorts from which they drew a sample, they are not nationally representative of all beginning postsecondary students because not all beginners enter directly from high school. In fact, according to BPS:04/09, one-third of all beginning postsecondary students were over age 19 when they entered for the first time.

Another related study conducted by NCES is the *Integrated Postsecondary Education Data System* (IPEDS) Graduation Rate Survey (GRS). Like BPS, the GRS provides data on enrollment and attainment for both recent and nonrecent high school graduates. However, its definition of beginning postsecondary students is more restrictive than that of BPS as it is limited to full-time, degree seeking, first-time postsecondary students who entered in the fall. In addition, GRS collects enrollment and attainment data from institutions rather than students, meaning it can only provide information on students' attainment at the first institution attended and not students' attainment at any institutions to which they transfer.

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**	Administrative data update
NPSAS:2000	B&B:2000/01	—	—
NPSAS:04	**BPS:04/06**	**BPS:04/09**	Administrative data update
NPSAS:08	B&B:08/09	B&B:08/12	—
NPSAS:12	**BPS:12/14**	**BPS:12/17**	**BPS:12/19**[1]

— Not applicable
[1] Tentative.
NOTE: BPS = Beginning Postsecondary Students; B&B = Baccalaureate and Beyond.

5. Method Used to Minimize Burden on Small Businesses

The student survey for BPS:12/14 does not involve small businesses or entities.

If the financial aid record collection is conducted, some small for-profit schools and other small public and private schools will be contacted. Burden will be minimized on these schools by working closely with a school-appointed coordinator (e.g., the financial aid administrator) before the data collection effort to identify the format in which records are kept and transmitted. Once this additional collection is funded, a separate forms clearance package will be submitted.

6. Frequency of Data Collection

BPS studies have been conducted periodically since 1990, as described in section 4 of Part A of this package. The BPS:12/14 full-scale data collection will be conducted in 2014, 2 years after the NPSAS:12 full-scale collection from which the BPS student sample was selected. A future follow-up with the BPS:12/14 student sample is anticipated in 2017, as part of BPS:12/17, and may include an interview, administrative record matching, student records collection, and a one-time transcript collection, if funded.

The 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—eligibility restrictions change, sizes of grant and loan amounts fluctuate, and the balance between various aid options can change dramatically. A recurring study is essential 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 beginning postsecondary 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. The new oversample of certificate seekers that will be available for the full-scale study, combined with the longitudinal nature of BPS, allows for analysis of how the value of these credentials shifts in response to market forces.

7. Special Circumstances of Data Collection

No special circumstances of data collection are anticipated.

8. Consultants Outside the Agency

Recognizing the significance of the BPS:12/14 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, ED, and the federal government.

Previous BPS implementations have benefited from a standing federal review panel comprising staff from many federal offices, including ED’s Office of Postsecondary Education, OMB, and the Congressional Budget Office. Some members of this panel also belong to the TRP for BPS. The membership of the TRP (see Appendix D) represents a broad spectrum of the postsecondary community. The nonfederal members serve as expert reviewers on the technical aspects of the study design, data collection procedures, and instrument design, especially item content and format. The TRP reviewed the proposed full-scale interview content and study design during its meeting in August 2013.

9. Provision of Payments or Gifts to Respondents

The use of incentives is an integral part of the overall data collection plan for BPS:12/14, and is proposed for the purpose of encouraging early response and minimizing nonresponse. The data collection design is described in detail in Part B, Item 4, Tests of Procedures and Methods. The proposed design includes a calibration experiment to determine the optimal incentive level for a given case. Approximately 3,000 students will be randomly assigned to one of 11 incentive categories, from $0 to $50 in $5 increments, to encourage participation during the early response phase of data collection. In consultation within NCES and with OMB, in April 2014, the results of the experiment will be used to set the Phase 1 incentive(s) for the main study based on response propensity, at an amount between $0 and $50.

About 3 weeks after outbound calling has begun (approximately 7 weeks after the start of data collection), remaining nonrespondents in the calibration study will be evaluated for their potential to contribute to nonresponse bias. This information will be combined with the response propensity data to produce an importance score. Cases with high importance scores will receive an additional incentive offer in one of three randomly selected amounts, $15, $30, or $45. Results of the calibration study and discussions within NCES and with OMB will be used to establish case selection criteria and their additional incentive amounts for the main study. Given prior experience with this population, we expect that about 58 percent of the initial sample (or 20,000 cases) will be nonrespondents at the point that importance scores are calculated. Among those, we expect about 30 percent of cases (about 6,500 cases) will warrant special intervention during this phase to receive either a $15, $30, or $45 incentive increase.

May 22, 2014 Addendum: Updated text in Supplemental Statement Part B ("BPS 2012-14 Full Scale Part B") section 4b and the attached "BPS 2012-14 Full Scale Incentive Update Change Memo" summarizes the results of the incentive calibration study and the reasons for deciding to offer a $30 incentive to the remaining 90 percent of the full-scale sample in the initial Phase 1, and a $45 incentive to approximately 30 percent of the sample nonrespondents remaining at the start of Phase 3, based on the importance score model.

10. Assurance of Confidentiality

NCES assures participating individuals and institutions that all identifiable information collected in the BPS studies and related programs 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 [Education Sciences Reform Act of 2002 (ESRA 2002), 20 U.S.C. § 9573]. BPS:12/14 data security and confidentiality protection procedures are in place to ensure that RTI and its subcontractors comply with all privacy requirements, including the following:

- Statement of Work of this contract;
- Privacy Act of 1974 U.S.C. § 552(a) (2009);
- U.S. Department of Education Incident Handling Procedures (February 2009);
- U.S. Department of Education General Handbook for Information Technology Security General Support Systems and Major Applications Inventory Procedures (March 2005);
- U.S. Department of Education, ACS Directive OM:5-101, Contractor Employee Personnel Security Screenings;
- Family Educational and Privacy Act of 1974, 20 U.S.C. § 1232g (2009);
- ESRA, 20 U.S.C. § 9573 (2009); and

- All new legislation, which impacts the data collection through this contract.

To further ensure that confidentiality is appropriately maintained at all times, vendors who assist in locating and tracing sample members are also required to follow procedures that appropriately safeguard personally identifying information. RTI's vendor contracts outline requirements for information security policies and assessments, security awareness training, physical and environmental security, monitoring, and access control. They also specify the means by which information may be transmitted between RTI and the contractor. Appendix B documents the data security language contained in vendor contracts.

RTI will adhere to NCES Statistical Standards (http://nces.ed.gov/statprog/2002/std4_2.asp). RTI will also comply with ED'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, OMB Circulars, and the National Institute of Standards and Technology standards and guidance.

Consistent with the standards, BPS:12/14 data security procedures require that notarized nondisclosure affidavits be obtained from all personnel who will have access to individual identifiers (copies of the agreement and affidavit are provided in Appendix E). Also implemented are 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. The procedures for securing sensitive project data will include the following: physical/environment protections, building access controls, system access controls, system login restrictions, user identification and authorization procedures, encryption, and project file storage/archiving/destruction.

There are several security measures in place to protect data during file matching procedures. NCES has a secure data transfer system, which uses Secure Sockets Layer technology, allowing the transfer of encrypted data over the Internet. The NCES secure server will be used for all administrative data sources, with the exception of the National Student Clearinghouse (NSC), which has its own secure File Transfer Protocol site. All data transfers will be encrypted using Federal Information Processing Standards 140-2 validated encryption tools.

Furthermore, ED has established a policy regarding the personnel security screening requirements for all contractor employees and their subcontractors to secure the confidentiality of BPS respondents. The contractor must comply with these personnel security screening requirements throughout the life of the contract. The ED directive that contractors must comply with is OM: 5-101, which was last updated on July 16, 2010. There are 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 on the level of harm that a person in the position can cause to ED'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 ED will occur.

Sample member contact materials will describe the voluntary nature of the BPS:12/14 interview and convey the extent to which study member identifiers and responses will be kept confidential. Similarly, the scripts to be read by telephone staff will be very specific in the assurances made to sample members and contacts. Contacting materials are presented in Appendix F. The following confidentiality language is provided in the study brochure that is supplied to all sample members:

> The 2012/14 Beginning Postsecondary Students Longitudinal Study (BPS:12/14) is conducted under the authority of the Education Sciences Reform Act (ESRA) of 2002 (20 U.S.C. § 9543), which authorizes NCES to collect and disseminate information about education in the United States. Collection is most often done through surveys.
>
> NCES is required to follow strict procedures to protect the confidentiality of persons in the collection, reporting, and publication of data. All individually identifiable information supplied by individuals or institutions to NCES may be used only for statistical purposes and may not be disclosed or used in identifiable form for any other purpose, unless otherwise compelled by law (20 U.S.C. § 9573).

11. Sensitive Questions

The BPS:12/14 interview contains items about earnings, assets and debts, and marital and family status. Federal regulations governing the administration of these questions, which might be viewed as sensitive due to personal or private information, require (a) clear documentation of the need for such information as it relates to the primary purpose of the study, (b) provisions to respondents that clearly inform them of the voluntary nature of participation in the study, and (c) assurances that responses may be used only for statistical purposes, unless otherwise compelled by law (20 U.S.C. § 9573). Several procedures have been implemented to provide these assurances to respondents. They are outlined in the confidentiality agreements shown in Appendix E.

The collection of data related to income, earnings, assets, indebtedness, and long-range employment outcomes is central to understanding key policy issues driving this study. Financial assets and obligations can play an important role in student persistence in, and completion of, postsecondary education programs. In addition, information about income, earnings, and assets provides vital labor force variables and important indicators of the rate of return of educational experiences to the respondent.

The collection of information about marital and family status also facilitates the exploration of key policy issues. Social and economic support provided by spouses can play an important role in students enrolling and persisting in postsecondary education and the successful transition to employment. Financial and family-related obligations also influence decisions about employment and additional education, so it is important to collect information about marital status and dependents.

12. Estimates of Response Burden

BPS:12/14 will involve the collection of respondent interview data by self-administered web and telephone interview. Burden estimates—including number of sample members, expected response rates, and estimated time per respondent—are shown in table 2. Burden estimates for the administrative record collection from institutions will be provided with the submission for that full-scale data collection.

Table 2. Estimated BPS:12/14 full-scale data collection cost and response burden

BPS:12/14 Full-scale	Sample Size	Expected Participation Rate	Expected Eligible	Expected Number of Respondents*	Ave Burden (mins)	Total Burden (hours)	Rate per hour ($)	Total cost ($)
Panel Maintenance (address updates)	37,166	15%	N/A	5,575	5.0	465	$10	$465
Calibration Pretest								
Base year respondents	1,111	80%	90%	800	30.0	400	$10	$4,000
Base year nonrespondents	1,600	45%	80%	576	35.0	336	$10	$3,360
Non study members	907	25%	75%	170	35.0	99	$10	$990
Student Interview								
Base year respondents	28,965	80%	90%	20,855	30.0	10,428	$10	$104,280
Base year nonrespondents	3,011	45%	80%	1,084	35.0	632	$10	$6,320
Non study members	1,572	25%	75%	295	35.0	172	$10	$1,720
Total				**23,780**		**12,532**		

NOTE: BPS:12/14 = 2012/14 Beginning Postsecondary Students Longitudinal Study, FTB = First Time Beginner
Potential FTB's are those NPSAS:12 non-respondents who appeared to be FTB's in NPSAS:12 student records data. Non study members are those NPSAS:12 sample members who, across all data sources, did not have sufficient data to support the analytic objectives of the study.

* The total expected number of respondents excludes those listed under panel maintenance, because they are already accounted for under pretest and interviews. The total number of responses is the sum of expected numbers of respondents across all categories (29,355).

13. Estimates of Cost to Respondents

Respondents will incur no costs for equipment, printing, postage or any other activities associated with participation in this study.

14. Costs to the Federal Government

A summary of the estimated costs to the federal government for BPS:12/14 is shown in Table 3. Included in the contract estimates are all staff time, reproduction, postage, and telephone costs associated with the management, data collection, analysis, and reporting for which clearance is requested. A more detailed breakdown of contract costs is provided in table 4.

Table 3. Costs to the National Center for Education Statistics for BPS:12/14

Costs to NCES	Amount ($)
BPS:12/14 Field Test Study	
Salaries and expenses	$ 111,290
Contract costs	2,845,927
Total	2,957,217
BPS:12/14 Full-Scale Study	
Salaries and expenses	333,870
Contract costs	7,508,204
Total	7,842,074
BPS:12/14 Total Costs	
Salaries and expenses	445,160
Contract costs	10,354,130
Total	10,799,290

NOTE: BPS:12/14 = 2012/14 Beginning Postsecondary Students Longitudinal Study.

Table 4. Contract costs for BPS:12/14

Study area and task management		Budgeted amount ($)
110	Initial meeting with NCES	38,245
120	Schedules	40,235
130	Monthly reports	367,732
140	Integrated monitoring system	471,607
150	Technical review panels	865,358
Field test (FT)		
210	FT Sampling	38,140
220	FT RIMG/OMB forms clearance	90,983
231	Instrumentation	696,220
232	Tracing	68,368
234	Training for Web/CATI data collection	126,693
236	Web/CATI data collection	393,288
237	Data processing	358,230
240	Methodology report	182,416
Full-scale (FS) data collection		
310	FS Sampling	47,419
320	FS RIMG/OMB forms clearance	56,630
331	Instrumentation	673,805
332	Tracing	402,399
334	Training for web/CATI data collection	309,055
336	Web/CATI data collection – general	2,211,376
	Web/CATI data collection – incentives	576,898
337	Data processing	720,259
338	Weighting, imputation, and nonresponse bias analysis	211,472
339	Data disclosure planning and prevention	57,574
340	Methodology report	311,049
Descriptive reporting		
410	First Look report	73,163
420	Data analysis system	440,612
430	Additional special tabulations	135,937
440	Descriptive reports	108,415
450	Respond to information requests	267,645
460	Final technical memo	12,907
Total		$ 10,354,130

NOTE: Costs presented here do not include base or award fee. BPS:12/14 = 2012/14 Beginning Postsecondary Students Longitudinal Study; CATI = computer-assisted telephone interviewing; OMB = Office of Management and Budget; RIMG = Regulatory Information Management Group.

15. Reasons for Changes in Response Burden and Costs

The apparent increase in respondent burden is due to the fact that the previous clearance was for the BPS:12/14 field test, while this submission is for the full scale data collection.

16. Publication Plans and Time Schedule

The contract for BPS:12/14 requires the following reports, publications, or other public information releases:

- A First Look report and Web Tables;

- Complete data files and documentation for research data users in the form of both a restricted-use file and public-use data tools (i.e., QuickStats, PowerStats);
- Detailed data file documentation describing all aspects of the full-scale study design and data collection procedures; and
- Special tabulations of issues of interest to the higher education community, as determined by NCES

Additional reports, including Statistics in Brief and Statistical Analysis Reports, may also be published from the full-scale data. For examples of publications using prior BPS studies see Appendix C.

The operational schedule for the BPS:12/14 full-scale study is shown in table 5.

Table 5. Operational schedule for BPS:12/14

Activity	Start date	End date
Field Test		
Update/deliver sample specifications	7/10/2012	9/25/12
Conduct locating and tracing activities	8/16/2012	6/28/2013
Conduct help desk and CATI training	12/19/2012	3/22/2013
Data collection		
Self-administered web interviews	3/18/2013	6/28/2013
Conduct telephone interviews of students	3/26/2013	6/28/2013
Process data, construct data files	1/28/2013	8/30/2013
Prepare data file documentation	4/4/2013	11/3/2014
Full-scale		
Update/deliver sample specifications	7/15/2013	2/11/2014
Conduct locating and tracing activities	7/22/2013	9/15/2014
Conduct help desk and CATI training	11/25/2013	5/23/2014
Conduct Institution Contactor training	8/12/2014	10/10/2014
Data collection		
Self-administered web interviews	2/18/2014	9/15/2014
Conduct telephone interviews of students	2/25/2014	9/15/2014
Process data, construct data files	12/16/2013	9/4/2015
Prepare and submit reports	8/14/2014	5/16/2016
Collect student financial aid data from institutions	10/1/2014	4/15/2015

NOTE: BPS:12/14 = 2012/14 Beginning Postsecondary Students Longitudinal Study; CATI = Computer assisted telephone interview; CAPI = Computer assisted personal interview

17. Approval to Not Display Expiration Date for OMB Approval

No special exception is 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 8.