Appendix 7
Linkages to Extant Data Sources

7.1   Develop Linkages with Extant Data Sources

RTI recognizes the value added to the ELS:2002 data with the addition of data from specific extant data sources. RTI will develop linkages with several existing data sources to supplement the student interview data. Because certain data (for example, specific financial aid amounts and associated dates) can only be accurately obtained from sources other than the student or parent. Through our experience providing data for many National Center for Education Statistics (NCES) studies, including previous ELS:2002 data collections, Baccalaureate and Beyond Longitudinal Study (B&B), National Postsecondary Student Aid Study (NPSAS), and Beginning Postsecondary Student (BPS) study, we have gained considerable knowledge performing file merges with these sources of valuable data, including Department of Education's (ED) Central Processing (CPS) for Free Application for Federal Student Aid (FAFSA) data, the National Student Loan Data System (NSLDS), and the General Educational Development (GED) Testing Service. For this study, we propose to perform file merges with the following datasets: GED, CPS, and NSLDS.

The Family Educational Rights and Privacy Act (FERPA), (34 CFR Part 99) allows the disclosure of information without prior consent for the purposes of ELS according to the following excerpts: 99.31 asks "Under what conditions is prior consent not required to disclose information?" and explains in 99.31 (a) 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 specific conditions. ELS collection falls under Sec. 99.31 (a)(3). The disclosure is, subject to the requirements of Sec. 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.

ELS is collecting data under the Secretary's authority. The personally identifiable information is collected from student record systems with adherence to the security protocol detailed in 99.35: "What conditions apply to disclosure of information for Federal or State program purposes?"

(a)(1) Authorized representatives of the officials or agencies headed by officials listed in Sec. 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) Authority for an agency or official listed in Sec. 99.31(a)(3) to conduct an audit, evaluation, or compliance or enforcement activity is not conferred by the Act or this part and must be established under other Federal, State, or local authority.

 (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 officials or agencies headed by officials referred to in paragraph (a) of this section, except that those officials and agencies 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 Sec. 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 Sec. 99.30; or

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

Secure Data Transfers. NCES has set up a secure data transfer system, using their NCES member site with Secure Sockets Layer (SSL) technology, described above. We will use this electronic system for submitting data containing potentially identifying information (such as SSNs, names, and dates of birth of our sample members) along with their survey ID (not the same ID that is available on the restricted-use data). Before being transmitted, files will be encrypted using FIPS 140-2 validated encryption tools. We will receive data from the NCES system as well. The system requires that both parties to the transfer be registered users of the NCES Members Site and that their Members Site privileges be set to allow use of the secure data transfer service as described above. This process will be used for all file matching procedures described below, except in instances when the vendor already has a secure data transfer system in place.

7.2   File Merge with ED Central Processing System (CPS)

RTI proposes to perform file merges with the CPS data containing federal student aid application information. The merge with CPS can occur at any time for any number of cases, provided that the case has an apparently valid SSN associated with it. RTI sends a file to CPS and receives in return a large data file containing all students who applied for federal aid. We already have existing programs and procedures in place to prepare and submit files according to rigorous CPS standards. Similarly, we have already developed programs and procedures to receive and process data obtained from CPS.

RTI will electronically upload a file on the FAFSA secure web-site for matching which contains SSN and the first 2 letters of the sample member's last name (but no other information). Access to the site for the upload is restricted to authorized users who are registered and provide identification/authentication information (SSN, DOB, and personal identification number [PIN]) to the FAFSA data site. The file is retrieved by the Central Processing System or CPS (the FAFSA contractor data system) for linkage. The linked file, containing student aid applications for matched records, is then made available to us only through a secure connection (EdConnect) which requires username and password. All CPS files will be processed, edited, and documented for inclusion on the analytic data files.

7.3   File Merge with National Student Loan Data System Disbursement

RTI will also conduct a file merge with the NSLDS to collect federal loan and Pell grant data. The resulting file will contain cumulative amounts for each student's entire postsecondary

education enrollment. We have programs to create the files for the merge and also programs to read the data we receive. All matching processes are initiated by RTI staff providing a file with one record per sample member. File transfers will use the NCES secure data transfer system described above.

7.4   File Merge with General Educational Development Testing Service

RTI will also conduct a file merge with the GED testing service, as was done in ELS:2002/06 to obtain GED test dates and results. This will extend the coverage for the ELS:2002 sample regarding attempts for high school equivalency credentialing. File transfers will use the NCES secure data transfer system described above.

7.5   Processing Extant Data

The data from all of these sources, as allowed by the vendor, will be delivered in the restricted-use data files and will be useful for creating derived variables. The variables – both direct and derived – will be documented thoroughly for the data files.