

# 2012/17 Beginning Postsecondary Students Longitudinal Study: (BPS:12/17)

## Full Scale Interview and Administrative Record Collections

August 2016

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**Appendix A**  
**Technical Review Panel (TRP) Members**

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## Technical Review Panel

Michelle Appel  
Director, Assessment and Decision Support  
University of Maryland  
1101 Mitchell Building  
College Park, MD 20742  
Phone: (301) 405-0475  
Email: mappel@umd.edu

Teresita Bazan  
Executive Director of Student Assistance  
Austin Community College  
5930 Middle Fiskville Road  
Austin, TX 78752  
Phone: (512) 223-7550  
Email: tbazan@austincc.edu

Angela Bell  
Senior Executive Director of Research and  
Policy Analysis  
University System of Georgia  
207 Washington Street SW  
Atlanta, GA 30334  
Phone: (404) 962-3069  
Email: angela.bell@usg.edu

Alberto Cabrera  
Professor  
University of Maryland  
3112 Benjamin Building  
College Park, MD 20742  
Phone: (301) 405-2875  
Email: cabrera@umd.edu

Margaret Cahalan  
Vice President for Research & Director  
Council for Opportunity in Education  
The Pell Institute  
1025 Vermont Avenue NW  
9th Floor  
Washington, DC 20005  
Phone: (202) 347-7430  
Email:  
margaret.cahalan@pellinstitute.org

Stephanie Cellini  
Associate Professor of Public Policy and  
Economics  
George Washington University  
805 21<sup>st</sup> Street NW  
Room 601 M  
Washington, DC 20052  
Phone: (202) 994-0019  
Email: srcellini@gmail.com

James Cole  
Project Manager, Beginning College Survey of  
Student Engagement  
Indiana University  
1900 East Tenth Street  
Eigenmann Hall, Suite 419  
Bloomington, IN 47406  
Phone: (812) 856-3004  
Email: colejs@indiana.edu

William Doyle  
Associate Professor of Higher Education  
Vanderbilt University  
230 Appleton Place  
Nashville, TN 37203  
Phone: (615) 322-2904  
Email: w.doyle@vanderbilt.edu

Charlotte Etier  
Research Analyst  
National Association of Student Financial Aid  
Administrators  
1101 Connecticut Avenue NW  
Suite 1100  
Washington, DC 20036  
Phone: (202) 785-6943  
Email: etierc@nasfaa.org

Robert Gonyea  
Associate Director, Center for Postsecondary  
Research  
Indiana University Bloomington  
1900 East 10th Street  
Suite 419  
Bloomington, IN 47406  
Phone: (812) 856-5824  
Email: rgonyea@indiana.edu

Manuel S. Gonzalez Canche  
Assistant Professor  
University of Georgia  
116 Meigs Hall  
Athens, GA 30602  
Phone: (706) 583-0048  
Email: msgc@uga.edu

Jacob Gross  
Assistant Professor  
University of Louisville  
4713 South 6th Street  
Louisville, KY 40214  
Phone: (502) 724-4453  
Email: jacob.gross@louisville.edu

Taylor Hansen  
Director of Legislative & Regulatory Affairs  
Association of Private Sector Colleges and  
Universities  
1101 Connecticut Avenue NW  
Suite 900  
Washington, DC 20036  
Phone: (202) 336-6707  
Email: taylor.hansen@apscu.org

Nicholas Hillman  
Assistant Professor  
University of Wisconsin-Madison  
1000 Bascom Mall  
Education Building, Room 249  
Madison, WI 53706  
Phone: (812) 345-1435  
Email: nwhillman@wisc.edu

Patrick Kelly  
Senior Associate and Director  
National Center for Higher Education  
Management Systems  
3035 Center Green Drive  
Suite 150  
Boulder, CO 80301  
Phone: (720) 987-3391  
Email: patrick@nchems.org

Greg Kienzl  
Senior Research Associate  
ACT, Inc.  
One Dupont Circle NW  
Suite 220  
Washington, DC 20036  
Phone: (202) 223-2318  
Email: kienzlg@act.org

Kent Phillippe  
Associate Vice President, Research & Student  
Success  
American Association of Community Colleges  
One Dupont Circle NW  
Suite 410  
Washington, DC 20036  
Phone: (202) 416-4505  
Email: kphillippe@aacc.nche.edu

Jason Ramirez  
Director of Research and Policy Analysis  
National Association of Independent Colleges  
and Universities  
1025 Connecticut Ave NW  
Suite 700  
Washington, DC 20036  
Phone: (202) 835-0003  
Email: jason@naicu.edu

Josipa Roksa  
Associate Professor of Sociology and Education  
University of Virginia, Department of Sociology  
P.O. Box 400766  
Charlottesville, VA 22904  
Phone: (434) 924-6528  
Email: jroksa@virginia.edu

Jonathan Smith  
Policy Research Scientist  
College Board  
1919 M Street NW  
Suite 300  
Washington, DC 20036  
Phone: (202) 741-4733  
Email: jsmith@collegeboard.org

Marvin Titus  
Associate Professor, Higher Education  
University of Maryland  
Benjamin Building, 3209  
College Park, MD 20742  
Phone: (301) 405-2220  
Email: mtitus@umd.edu

Jonathan Turk  
Policy Research Analyst  
American Council on Education  
One Dupont Circle NW  
Suite 1B  
Washington, DC 20036  
Phone: (202) 939-9321  
Email: jturk@acenet.edu

Mamie Voight  
Vice President of Policy Research  
Institute for Higher Education Policy (IHEP)  
1825 K Street NW  
Suite 720  
Washington, DC 20006  
Phone: (202) 587-4967  
Email: mvoight@ihep.org

### **Federal Panelists**

Daniel Pollard  
Senior Advisor, Enterprise Data  
U.S. Department of Education, FSA  
Office of the Chief Operating Officer  
830 First Street NE  
Washington, DC 20202  
Phone: (202) 377-3389  
Email: daniel.pollard@ed.gov

Emilda Rivers  
Director, Human Resources Statistics Program  
National Science Foundation  
4201 Wilson Boulevard  
Suite 965 S  
Arlington, VA 22230  
Phone: (703) 292-7773  
Email: erivers@nsf.gov

Bob Sivinski  
Statistician  
Office of Management and Budget  
725 17th Street NW  
Washington, DC 20503  
Phone: (202) 395-1205  
Email: robert\_g\_sivinski@omb.eop.gov

**U.S. Department of Education, NCES**

Peggy Carr  
Acting Commissioner  
U.S. Department of Education, NCES  
550 12th Street SW  
Potomac Center Plaza (PCP), Room 4061  
Washington, DC 20202  
Phone: (202) 245-6168  
Email: peggy.carr@ed.gov

Chris Chapman  
Associate Commissioner  
U.S. Department of Education, NCES  
550 12th Street SW  
Potomac Center Plaza (PCP), Room 4054  
Washington, DC 20202  
Phone: (202) 245-7103  
Email: chris.chapman@ed.gov

Elise Christopher  
Statistician  
U.S. Department of Education, NCES  
550 12th Street SW  
Potomac Center Plaza (PCP), Room 4005  
Washington, DC 20202  
Phone: (202) 245-7098  
Email: elise.christopher@ed.gov

Lisa Hudson  
Education Statistician  
U.S. Department of Education, NCES  
550 12th Street SW  
Potomac Center Plaza (PCP), Room 4013  
Washington, DC 20202  
Phone: (202) 245-7027  
Email: lisa.hudson@ed.gov

Tracy Hunt-White  
Education Statistician  
U.S. Department of Education, NCES  
550 12th Street SW  
Potomac Center Plaza (PCP), Room 4007  
Washington, DC 20202  
Phone: (202) 245-6507  
Email: tracy.hunt-white@ed.gov

Kashka Kubzdela  
OMB Liaison  
U.S. Department of Education, NCES  
550 12th Street SW  
Potomac Center Plaza (PCP)  
Washington, DC 20202  
Phone: (202) 245-7377  
Email: kashka.kubzdela@ed.gov

Gail Mulligan  
Longitudinal Surveys Branch Chief  
U.S. Department of Education, NCES  
550 12th Street SW  
Potomac Center Plaza (PCP), Room 4178  
Washington, DC 20202  
Phone: (202) 245-8413  
Email: gail.mulligan@ed.gov

David Richards  
BPS Project Officer  
U.S. Department of Education, NCES  
550 12th Street SW  
Potomac Center Plaza (PCP), Room 4037  
Washington, DC 20202  
Phone: (202) 245-6202  
Email: david.richards@ed.gov

Marilyn Seastrom  
Chief Statistician  
U.S. Department of Education, NCES  
550 12th Street SW  
Potomac Center Plaza (PCP), Room 4063  
Washington, DC 20202  
Phone: (202) 245-7766  
Email: marilyn.seastrom@ed.gov

Sean Simone  
Statistician  
U.S. Department of Education, NCES  
550 12th Street SW  
Washington, DC 20202  
Phone: (202) 245-7631  
Email: sean.simone@ed.gov

Ted Socha  
Mathematical Statistician  
U.S. Department of Education, NCES  
550 12th Street SW  
Potomac Center Plaza (PCP), Room 4004  
Washington, DC 20202  
Phone: (202) 245-7071  
Email: ted.socha@ed.gov

### **RTI International**

Michael Bryan  
Research Education Analyst  
RTI International  
3040 East Cornwallis Road  
P.O. Box 12194  
Research Triangle Park, NC 27709  
Phone: (919) 541-7498  
Email: mbryan@rti.org

Darryl Cooney  
Statistician  
RTI International  
3040 East Cornwallis Road  
P.O. Box 12194  
Research Triangle Park, NC 27709  
Phone: (919) 316-3486  
Email: dcooney@rti.org

Kristin Dudley  
Research Programmer Analyst  
RTI International  
3040 East Cornwallis Road  
P.O. Box 12194  
Research Triangle Park, NC 27709  
Phone: (919) 541-6855  
Email: marvill@rti.org

Jeffrey Franklin  
Senior Survey Methodologist  
RTI International  
3040 East Cornwallis Road  
P.O. Box 12194  
Research Triangle Park, NC 27709  
Phone: (919) 485-2614  
Email: jwf@rti.org

Jason Hill  
Director, BPS: 12/17  
RTI International  
3040 East Cornwallis Road  
P.O. Box 12194  
Research Triangle Park, NC 27709  
Phone: (919) 541-6425  
Email: jahill@rti.org

Nicole Ifill  
Research Education Analyst  
RTI International  
701 13th Street NW  
Suite 750  
Washington, DC 20005  
Phone: (202) 600-4295  
Email: nifill@rti.org

T. Austin Lacy  
Research Education Analyst  
RTI International  
3040 East Cornwallis Road  
P.O. Box 12194  
Research Triangle Park, NC 27709  
Phone: (919) 990-8386  
Email: tlacy@rti.org

Alexandria Radford  
Associate Director, Postsecondary Education  
RTI International  
701 13th Street NW  
Suite 750  
Washington, DC 20005  
Phone: (202) 600-4296  
Email: aradford@rti.org

David Wilson  
Senior Statistician/Statistical Task Leader  
RTI International  
3040 East Cornwallis Road  
P.O. Box 12194  
Research Triangle Park, NC 27709  
Phone: (919) 541-6990  
Email: dwilson@rti.org

Jennifer Wine  
Director, Program in Education Survey  
Design  
RTI International  
3040 East Cornwallis Road  
P.O. Box 12194  
Research Triangle Park, NC 27709  
Phone: (919) 541-6870  
Email: jennifer@rti.org

**Appendix B**  
**Confidentiality for Administrative Record Matching**

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## **B.1 Develop Linkages with Administrative Data Sources**

Linkages will be developed with existing data sources to supplement the 2012/17 Beginning Postsecondary Students Study (BPS:12/17). NCES recognizes the great value added to the BPS:12/17 data file with the addition of data from specific administrative data sources as certain data, such as specific financial aid amounts and associated dates, can only be accurately obtained from sources other than the student. Our postsecondary studies, including the National Postsecondary Student Aid Study (NPSAS) and the Baccalaureate and Beyond Longitudinal Study (B&B), have included file merges with many existing sources of valuable data, including Department of Education's (ED) Central Processing System (CPS) for Free Application for Federal Student Aid (FAFSA) data, the National Student Loan Data System (NSLDS), and National Student Clearinghouse (NSC). For this study, we plan to perform file merges with the following datasets: CPS, NSLDS, and NSC.

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:12/17 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 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.

**Secure Data Transfers.** NCES has set up a secure data transfer system, using the NCES member site with Secure Sockets Layer (SSL) technology. The contractor 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. Data will be received 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 file matching procedures described below, except in instances when the vendor already has a secure data transfer system in place.

## **B.2 File Merge with ED Central Processing System (CPS)**

File merges will be performed by the data collection contractor 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. A file will be sent to CPS and in return a large data file containing all matched students who applied for federal aid will be received. The data collection contractor has programs and procedures in place to prepare and submit files according to rigorous CPS standards, and to receive and process data obtained from CPS.

A file will be electronically uploaded 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 (user name, password, and token key) 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 also requires user name, password, and a token key. All CPS files will be processed, edited, and documented for inclusion in the final restricted use file (RUF).

## **B.3 File Merge with National Student Loan Data System (NSLDS) Disbursement**

A file merge will be conducted 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. NCES has set up a secure data transfer system that uses their NCES member site and Secure Sockets Layer (SSL) technology. 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. These privileges are set up and carefully controlled by the ED's Institute of Education Sciences (IES) NCES Chief Technology Officer (CTO), a service designed by ED/NCES specifically for the secure transfer of electronic files containing personally identifying information (i.e., data protected under the Privacy Act or otherwise posing risk of disclosure), and can be used for NCES-to-Contractor; Contractor-to-Subcontractor; Subcontractor-to-Contractor; and Contractor-to-Other-Agency data transfers. The party uploading the information onto the secure server at NCES is responsible for deleting the file(s) after the successful transfer has been confirmed. Programs have been developed to create the files for the merge and also to read the data received. All matching processes are initiated by the data collection staff providing a file with one record per sample member to be merged.

#### **B.4 File Merge with the National Student Clearinghouse (NSC)**

The NSC will be used to obtain its “Student Tracker” data, which include student-level data, provided by participating institutions, on institutions attended, enrollment dates, and degree completions for the BPS:12/17 sample.

The data collection contractor will first set up an account with the Clearinghouse which will enable sending and receiving of files securely over encrypted FTPS connections. The file containing sensitive student identifiers (name, date of birth, and SSN) will be encrypted using FIPS 140-2 validated encryption tools then submitted to the Clearinghouse using their secure FTP site. All files received by the Clearinghouse will be securely stored using FIPS 140-2 validated AES encryption, the US federal encryption standard. Matched files, containing data on enrollment dates, institution names, and degrees completed, will be returned to the data collection contractor using the same secure FTP site.

#### **B.5 Processing Administrative Data**

We propose to send files for matching during data collection. We may need to match to a source (e.g., CPS or NSLDS) more than once during the full-scale study.

The data from all of these sources, as allowed by the vendor, will be delivered for inclusion on the RUF and will be useful for creating derived variables. The derived variables will be available on PowerStats and QuickStats, and both direct-pull and derived variables will be documented thoroughly. Data from CPS and NSLDS will also be useful for purposes of locating the sample.