2016/17 BACCALAUREATE AND BEYOND (B&B:16/17) MAIN STUDY

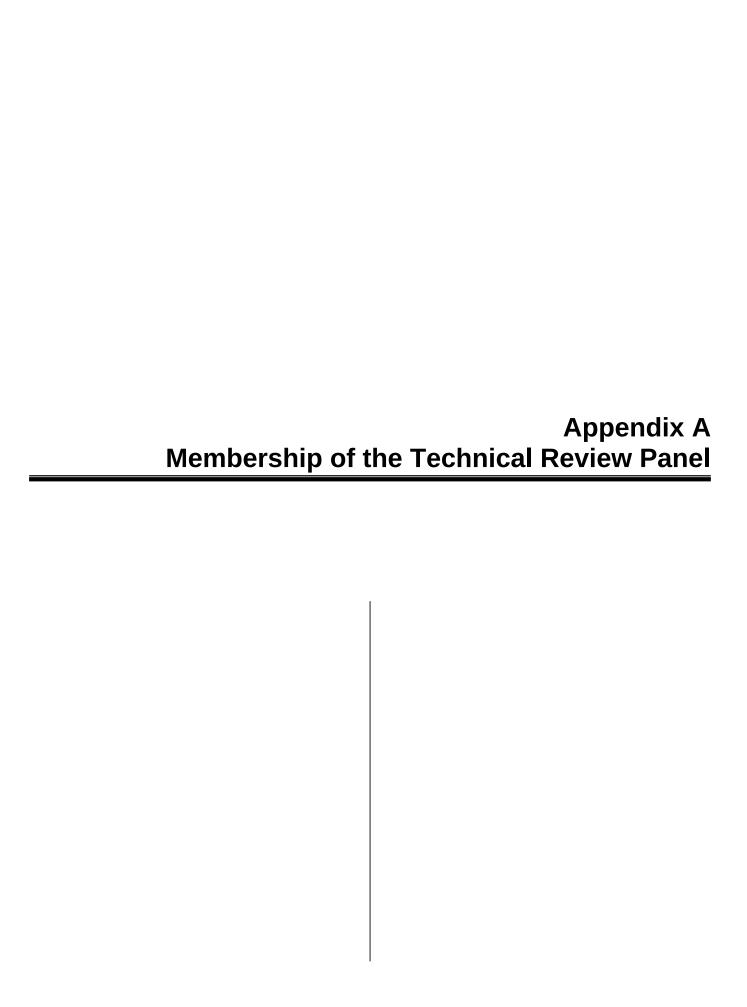
Appendices A and B OMB # 1850-0926 v.3

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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 2016/17 Baccalaureate and Beyond Longitudinal Study (B&B:16/17) main study collection. NCES recognizes the value added to the B&B:16/17 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 Beginning Postsecondary Students Study (BPS), have included file merges with many existing sources of valuable data, including the Department of Education's (ED's) Central Processing System (CPS), the data collected for the Free Application for Federal Student Aid (FAFSA), and the National Student Loan Data System (NSLDS). Also, data is bought from the National Student Clearinghouse (NSC), a third-party vendor. For this study, we plan to perform file merges with the following datasets: CPS, NSLDS, and NSC.

As described in more detail in Section A.10 of the Supporting Statement Part A, which is a part of this request, the Family Educational Rights and Privacy Act (FERPA) (34 CFR Part 99) allows the disclosure of information without prior consent for the purposes of B&B:16/17 according to 34 CFR §99.31.

Secure Data Transfers. ED's Institute of Education Sciences (IES) has set up a secure data transfer system (https://transfer.ies.ed.gov/), which uses Secure Sockets Layer (SSL) technology. After FIPS 140-2 validated encryption on the files is performed before upload, the contractor will use this electronic system for submitting data. The data may contain potentially identifying information such as SSNs, names, and dates of birth of study sample members along with their survey ID (different from the ID used in the restricted-use data files).

Data will be received from the IES 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 Merges with ED's 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 cases have apparently valid SSNs associated with them. A file will be sent to CPS and, in return, a 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.

For matching purposes, a file containing the SSN and the first two letters of the sample member's last name (but no other information) will be uploaded to the FAFSA secure website. Access to the site for the upload is restricted to authorized

users who are registered and provide identification/authentication information (username and password) 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 and password. 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. IES has set up a secure data transfer system (https://transfer.ies.ed.gov/), which uses 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 IES's Chief Technology Officer (CTO), a service designed by IES 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). This service 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 purchase the *Student Tracker* data on institutions attended, enrollment dates, and degree completions for the B&B:16/17 sample. The data collection contractor will first set up an account with NSC which will enable sending and receiving of files securely over encrypted FTPS connections. The file containing personally identifiable information (PII), i.e. name, date of birth, and SSN, will be encrypted using FIPS 140-2 validated encryption tools and then submitted to the Clearinghouse using their secure FTP site. All files received by NSC 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 encrypted FTPS site.

B.5 Processing Administrative Data

We will send files for matching during data collection, and we may need to match to a source (e.g., CPS or NSLDS) more than once during the main 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. In addition to access via the RUF, the derived variables will be available on PowerStats and

QuickStats (https://nces.ed.gov/datalab). Both direct-pull and derived variables will be documented thoroughly. Data from CPS will also be useful for purposes of locating the sample.