2019-20 NATIONAL POSTSECONDARY STUDENT AID STUDY (NPSAS:20)

Appendix A: Technical Review Panel Member

Appendix B: Endorsing Organizations for NPSAS:20

Appendix C: Confidentiality for Administrative Record Matching

OMB # 1850-0666 v.25

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(Panelists from May 2019 meeting to discuss student data collection)

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Appendix B Endorsing Organizations for NPSAS:20

NPSAS:20 Endorsing Organizations

Endorsement will be sought from the following organizations which previously endorsed NPSAS:18-AC:

American Association of Collegiate Registrars and Admissions Officers

American Association of Community Colleges

American Association of State Colleges and Universities

American Council on Education

Association for Institutional Research

Association of American Colleges & Universities

Association of Catholic Colleges and Universities

Association of Public and Land-grant Universities

Carnegie Foundation for the Advancement of Teaching

Career Education Colleges and Universities

The College Board

Council of Graduate Schools

Council of Independent Colleges

Education Commission of the States

Hispanic Association of Colleges and Universities

Midwestern Higher Education Compact

National Association of College and University Business Officers

National Association of Independent Colleges and Universities

National Association of State Student Grant and Aid Programs

National Association of Student Financial Aid Administrators

New England Board of Higher Education

Southern Regional Education Board

State Higher Education Executive Officers Association

United Negro College Fund

Western Interstate Commission for Higher Education

[The list of endorsing organizations will be finalized prior to data collection and will include those listed above (upon confirmation) as well as any additional organizations for which endorsement is sought and confirmed.]

Appendix C Confidentiality for Administrative Record Matching

C.1 Develop Linkages with Administrative Data Sources

Linkages will be developed with existing data sources to supplement the 2019–20 National Postsecondary Student Aid Study (NPSAS:20). The National Center for Education Statistics (NCES) recognizes the great value added to the NPSAS:20 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. Postsecondary studies, including previous NPSAS studies, Beginning Postsecondary Students (BPS), and Baccalaureate and Beyond (B&B), have included file merges with many existing sources of valuable data, including the U.S. Department of Education's Central Processing System (CPS) for Free Application for Federal Student Aid (FAFSA) data, the National Student Loan Data System (NSLDS), the National Student Clearinghouse (NSC), ACT, the College Board (SAT), and the Veterans Benefits Administration (VBA) data. For this study, contractor and NCES staff plan to perform file merges with the following datasets: CPS, NSLDS, NSC, ACT, SAT, and VBA.

As described in 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 NPSAS:20, according to 34 CFR §99.31.

As part of initial sampling activities, we will ask participating institutions to provide Social Security Numbers (SSNs) for all students on their enrollment list. Having an initial list of all students' SSNs minimizes the time and burden on both the institution and the data collection contractor. Institutions will only have to provide one enrollment list, except institutions selected to participate in the calibration study will be asked to provide both a fall list and spring list. If SSNs were provided only for those students selected, the institutions would have to provide two (or in the case of the calibration study, four) separate enrollment lists. SSNs and all other sample member identifying information are protected using the security measures described in section A.10.

Secure Data Transfers. The 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. The contractor will use this electronic system for submitting data. The data may contain potentially personally identifiable information (PII) such as SSNs, names, and dates of birth of study sample members along with a special file match ID (different from the ID used in data collection, on interim data files, and the restricted-use data files).

Data will be received from the IES system as well. The system requires that one party of the transfer be a registered user 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. The study contractor has such users. These privileges are set up and carefully controlled by IES's Chief Technology Officer (CTO), a service designed by IES specifically for the secure transfer of electronic files containing PII (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. 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.

C.2 File Merges with Central Processing System (CPS) Data

File merges will be performed by the contractor with the CPS data containing federal student aid application information. The merge with CPS will only occur for cases with a SSN that meets the criteria for validity. A file containing the SSN and the first two letters of the sample member's last name (but no other information) will be electronically uploaded to FAFSA secure website for matching. Access to FAFSA data site for the upload is restricted to authorized users, who are registered and provide identification/authentication information (ID, password, and token key). The file is retrieved by CPS (FAFSA contractor data system) for linkage. The linked file, containing student aid applications for matched records, is then made available to the study contractor through a secure connection, which also requires ID, password, and token key. Files will be downloaded directly into the contractor's Enhanced Security Network (ESN). All CPS files will be processed, edited, and documented for inclusion in the final restricted use file (RUF).

C.3 File Merge with National Student Loan Data System Disbursement (NSLDS) Data

A file merge will be conducted with NSLDS to collect federal loan and Pell Grant data. The resulting file will contain cumulative amounts for each student's entire postsecondary education enrollment. There are two methods for obtaining NSLDS data. One is an automated process developed specifically for NCES studies. A file containing SSNs, names, and dates of births are uploaded through the same secure connection discussed in section C.2 for CPS which requires ID, password, and token key. The results file is transmitted back to the study contractor using the same system. In the second process for obtaining NSLDS data, the study contractor uploads a file of SSNs via IES File Transfer System. The file merge is performed using custom SQL queries and results files are downloaded through the same IES site.

C.4 File Merge with National Student Clearinghouse (NSC) Data

NSC will be used to obtain the *Student Tracker* data on institutions attended, enrollment dates, and degree completions for the NPSAS:20 sample. The contractor has an account with NSC which enables sending and receiving of files securely over encrypted FTPS connections. The file containing PII will be encrypted and then submitted to NSC using their secure FTP site. All files received by NSC will be securely stored using current industry standard tools that meet the U.S. federal encryption standard. Results files will be returned to the contractor through the same encrypted FTPS site. The contractor has already established an agreement with NSC.

C.5 File Merge with American College Testing (ACT) Data

To obtain valuable admissions test data, a file merge will be performed with ACT data by the study contractor. NPSAS has collected and utilized ACT data since NPSAS:96. Matching of students to ACT data uses PII to assist the data vendor in performing confirmatory data quality checks. This process will be initiated by providing a file containing the sample member information then creating a password-protected, encrypted file; uploading the electronic file to IES File Transfer System for download by ACT. ACT will process the data on their database and provide the matched data on IES File Transfer System for secure download. The study contractor must establish a data use agreement (DUA) with the vendor prior to conducting this match. If the study contractor is unable to secure an agreement with ACT, a change memo will be submitted to OMB by October 2020.

C.6 File Merge with the College Board's SAT Data

To obtain SAT data, a file merge will be performed with the College Board by the study contractor. Matching of students to SAT data uses PII to assist the data vendor in performing confirmatory data quality checks. This process will be initiated by providing a file containing the sample member information. The same procedures will be used as described in section C.5 for ACT linkage: creating a password-protected, encrypted file; uploading the electronic file on IES File Transfer System for download by the College Board. The College Board will process the data on their database and provide the matched data on IES File Transfer System for secure download. The study contractor must establish a DUA with the vendor prior to conducting this match. If the study contractor is unable to secure an agreement with the College Board, a change memo will be submitted to OMB by October 2020.

C.7 File Merge with the Veterans Benefits Administration (VBA)

To identify veterans and their federal Veteran's education benefits, a file merge will be performed with the VBA data. These data from the VBA contain reliable military service records of all applicable sample members, so that variables pertaining to military service can be derived. The data obtained from VBA also contain detailed information on veterans federal education benefit amounts, and the enrollment information associated with those benefits. Matching of sample members to VBA data uses PII to assist the data vendor in performing confirmatory data quality checks. The data collection contractor will initiate this process by providing a file containing the sample member information. The same procedures will be used as described above for the ACT and SAT linkages: creating a password-protected, encrypted file, and uploading the electronic file on IES' File Transfer system for pick-up by the VBA. The VBA will process the data on their database and provide the matched data on the IES File Transfer system for secure download. NCES has an established agreement with VBA, in place since NPSAS:16.

C.8 Processing Administrative Data

NCES staff will send files for matching after the student record abstractions are completed to ensure the availability of the maximum number of verified SSNs and to facilitate the batch mode processing that is suitable to many of these resources. Data collection staff may need to match to a source (for example, CPS or NSLDS) more than once.

All of the collected information 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 data from all of these sources, as allowed by the vendor, and stripped of direct identifiers, will be delivered for inclusion on the RUF and will be useful for creating derived variables. The derived variables will be available on PowerStats, QuickStats, and TrendStats, and both direct-pull and derived variables will be documented thoroughly.