

2023-24 NATIONAL POSTSECONDARY STUDENT  
AID STUDY (NPSAS:24) FULL-SCALE  
STUDY

INSTITUTION CONTACTING AND LIST COLLECTION

Appendices A-C

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- C. Confidentiality for Administrative Record Matching

OMB # 1850-0666 v. 35

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

**July 2023**

# Appendix A

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**Appendix B**  
**Endorsing Organizations for NPSAS:24**

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## **NPSAS:24 Endorsing Organizations**

### **Endorsements are being sought<sup>2</sup> from the following organizations:**

ACPA – College Student Educators International  
American Association of Colleges & Universities  
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 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  
Hispanic Association of Colleges and Universities  
Midwestern Higher Education Compact  
NASPA – Student Affairs Administrators in Higher Education  
National Association of College and University Business Officers  
National Association of Independent Colleges and Universities  
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

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<sup>2</sup> The majority of these organizations have confirmed endorsement of NPSAS:24. The list of endorsing organizations will be finalized prior to data collection and will include all organizations that have confirmed endorsement at that time.

# Appendix C Confidentiality for Administrative Record Matching

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## C.1 Develop Linkages with Administrative Data Sources

Linkages will be developed with existing data sources to supplement the 2023–24 National Postsecondary Student Aid Study (NPSAS:24). The National Center for Education Statistics (NCES) recognizes the great value added to NPSAS:24 with the addition of data from specific administrative sources. Many data elements can only be accurately obtained from sources other than the student. Postsecondary studies, including previous NPSAS, 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 NPSAS:24, contractor and NCES staff plan to perform file merges with these same datasets.

As described in detail in Section A.10 of the Supporting Statement Part A, 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:24, 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 lists. Having this initial list of student SSNs minimizes the time and burden on both the institution and the data collection contractor. If SSNs were provided only for those students selected, the institutions would have to provide an additional enrollment list as part of list collection. 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 to be matched. The data may contain potentially personally identifiable information (PII) such as SSNs, names, and dates of birth of 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 transfer system as well. At least one party of the transfer must be a registered user of the NCES Members Site, and their Members Site privileges must be set to allow use of the secure data transfer service as described above. The data collection 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 an 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 the FAFSA secure website for matching. Access to the FAFSA data site is restricted to authorized users who are registered and provide identification/authentication information (ID, password, and token key). The file is retrieved by the CPS (FAFSA contractor data system) for linkage. The linked file, containing student aid applications for matched records, is then made available to the data collection 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 matched files are downloaded through the same IES site.

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

NSC matching will be used for two purposes in NPSAS:24. In one case, it will be used to obtain the *Student Tracker* data on enrollment dates and degree completions for preloading to the student survey to reduce burden on respondents. During the field test, NSC data were used to test a new process for collecting enrollment list data for selected institutions. 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 a data use agreement in place with NSC for NPSAS:24.

## **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 data collection contractor. NPSAS has collected and utilized ACT data since NPSAS:96. Matching of students to ACT data uses PII to assist 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 and uploading the electronic file to the IES File Transfer System for download by ACT. ACT will process the data on their database and provide the

matched data to IES File Transfer System for secure download. The contractor must establish a data use agreement (DUA) with the vendor prior to conducting this match.

### **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 data collection contractor. Matching of students to SAT data uses PII to assist 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 and uploading the electronic file to the 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 to the IES File Transfer System for secure download. The study contractor must establish a DUA with the vendor prior to conducting this match.

### **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 VBA data, containing the military service records of all applicable sample members, so that variables pertaining to military service can be derived. The data obtained from the 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 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 onto IES' File Transfer system for pick-up by the VBA. The VBA will process the data on their system and provide the matched data on the IES File Transfer system for secure download. In addition to the flag for sampling, full benefits information will be obtained for creating derived variables.

### **C.8 Processing Administrative Data**

For the NPSAS:24 full-scale collection, the contractor will send files for matching. Files may need to be matched to a source more than once during the course of the full-scale study. 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 administrative sources, when allowed by the vendor and stripped of direct identifiers, will be delivered for inclusion on the RUF and will be used for creating derived variables. The derived variables will be available on DataLab's PowerStats. Both direct-pull and derived variables will be documented thoroughly. Data will also be used for locating sample members, for panel maintenance and communications encouraging survey participation.