2020/25 BEGINNING POSTSECONDARY STUDENTS LONGITUDINAL STUDY (BPS:20/25) FULL-SCALE

Appendixes A-B

A. Technical Review Panel Attendees
B. Confidentiality for Administrative Record Matching

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Appendix B
Confidentiality for Administrative Record Matching

B.1   Develop Linkages with Administrative Data Sources

Linkages will be developed with existing data sources to supplement the 2020/25 Beginning Postsecondary Students Longitudinal Study (BPS:20/25). The National Center for Education Statistics (NCES) recognizes the great value added to the BPS:20/25 data file with the addition of data from specific administrative data sources given that certain data, such as specific financial aid amounts and associated dates, can only be accurately obtained from sources other than the student. NCES postsecondary studies, including previous cycles of the National Postsecondary Student Aid Study (NPSAS), the Beginning Postsecondary Students Longitudinal Study (BPS), and the Baccalaureate and Beyond Longitudinal Study (B&B), have included file merges with many existing sources of valuable data, including the Department of Education's (ED) FAFSA Processing System (FPS, formerly known as the Central Processing System, or CPS), the National Student Loan Data System (NSLDS), the National Student Clearinghouse (NSC), College Board, and the Veterans Benefits Administration's (VBA) data. For this study, NCES will perform file merges with the following datasets: FPS, NSLDS, NSC, and VBA.

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 BPS:20/25 according to 34 CFR §99.31.

Secure Data Transfers. In order to transfer data between the BPS:20/25 contractor and owners of the desired datasets, data files will undergo validated encryption and be transferred through a secure electronic data transfer system (https://transfer.ies.ed.gov/) using Secure Sockets Layer (SSL) technology. The contractors must be registered users of the NCES Members Site with privileges set to allow them to use the secure data transfer service. These privileges are set up and carefully controlled by the Institute of Education Sciences (IES) Chief Technology Officer (CTO). This service has been designed specifically for the secure transfer of electronic files containing personally identifiable information (PII), such as social security numbers (SSNs), names, and dates of birth of study sample members along with their survey IDs (different from the IDs used in the restricted-use data files), 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. Matching of sample members to the external datasets will be initiated by: (a) the BPS:20/25 contractor creating a password-protected, encrypted file containing sample members' PII; (b) uploading the electronic file to the file transfer system for pick-up by the external data source; and (c) the external data source processing the data on their database and providing the matched data on the file transfer system for secure download. The party uploading data into the file transfer system is responsible for deleting the file(s) after the successful transfer has been confirmed. Software has been developed to create the files for the merge and also to read the data received. All matching processes are initiated by the BPS:20/25 data collection staff providing a file with one record per sample member to be merged. This service will be used for the 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 FSA's Free Application for Federal Student Aid (FAFSA®) Processing System (FPS)

File merges will be performed by the contractor with the FPS containing federal student aid application information. The merge with FPS 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 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. Note that this is the current process, and it may need to be adjusted based on the requirements of the new FPS system. Files will be downloaded directly into the contractor's FIPS Moderate Network. All FPS 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 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 B.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.

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

The NSC will be used to obtain the *Student Tracker* data on institutions attended, enrollment dates, and degree completions for the BPS:20/25 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 PII will be encrypted and then submitted to the Clearinghouse 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 that includes BPS:20/25.

B.5   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 VBA will 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 VBA staff in performing confirmatory data quality checks. The data collection contractor will

initiate this process by providing a file containing sample member information to the VBA as a password-protected, encrypted file uploaded through the secure IES data 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.

B.6   Other Potential File Merges

The BPS:20/25 contactor could explore matches to additional data providers such as Experian and the National Directory of New Hires (NDNH). As with all other file merges, the contractor will store PII within the FIPS Moderate Network, use approved secure file transfer methods, and ensure matched data are stored and used in accordance with the relevant data-use agreement.

B.7   Processing Administrative Data

The BPS:20/25 contractor will send files for matching during data collection. Files may need to be matched to a source (e.g., CPS or NSLDS) 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 of these 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.