

RECOMMENDATIONS TO IMPROVE THE COLLECTION OF PERKINS PLACEMENT DATA IN ARIZONA

Submitted by:

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BACKGROUND

In December 2006, the Office of Vocational and Adult Education (OVAE), U.S. Department of Education, invited state directors of vocational education to submit requests for individualized technical assistance to improve the quality of their career and technical education (CTE) accountability systems. In response, the Arizona Department of Education submitted an application seeking support to improve the reliability and validity of placement data for secondary and postsecondary CTE concentrators who seek employment, who enroll in postsecondary education or advanced training, or who enroll in the military immediately following program completion.

Following conversations with Helen Bootsma, team leader of the CTE Development & Innovations Group Unit, MPR researchers identified two key areas for technical support:

- *Guidance on collecting Social Security Numbers (SSNs)*—State administrators are seeking recommendations to increase secondary students' disclosure of SSNs and guidance on the latest Family Educational Rights and Privacy Act (FERPA) guidelines, as they relate to collecting and using SSNs for accessing unemployment insurance (UI) wage record files.
- *Strategies for tracking students using administrative record matching*—State administrators desire guidance on the feasibility, cost, and procedures for conducting probabilistic matching with the National Student Clearinghouse (Clearinghouse) using student identifiers, including first name, last name, and birth date, as alternatives for SSNs. Administrators would also like to clarify their options for accessing data contained in the Federal Employment Data Exchange System (FEDES) and the Wage Record Interchange System (WRIS).

This report details approaches for improving state collection of secondary students' SSNs, along with the action steps and associated costs of adopting administrative record matching using SSNs or probabilistic matching to collect secondary and postsecondary placement data.

IMPROVING SOCIAL SECURITY NUMBER COLLECTION

On January 30, 2003, the U.S. Department of Education updated its guidance on the interaction between the Family Educational Rights and Privacy Act (FERPA) and accountability requirements contained in the Carl D. Perkins Vocational and Technical Education Act of 1998. Specifically, the 2003 guidance clarified the manner in which state or local education authorities may disclose protected information contained within a student's educational record without prior written consent.¹

In its 2003 guidance, the Department advised state education agencies that personally identifiable information within a student's secondary or postsecondary educational record must be protected from outside review. Under limited circumstances, for example in connection with an audit or evaluation of a federally-supported education program, protected student information, such as a student's Social Security Number (SSN), may be disclosed without the prior written consent of the student or his or her parent. To ensure student privacy, protected information must, however, remain under the direct control of an authorized representative of the state agency during the audit or evaluation process.

In practice, this means that a state education agency (or postsecondary institution) must delegate an employee or contractor to oversee the transfer and use of data in students' files. For example, should Arizona seek to track secondary student placement into employment using state unemployment insurance (UI) wage record data, an authorized state representative must either conduct the computer match at the state education agency or travel with the files to another facility to conduct or supervise the computer matching process. This is because a SSN is currently the only unique identifier that can be used to access state UI wage record data.

Educational agencies and postsecondary institutions have greater flexibility in disclosing protected information contained within an eligible student's educational record if the student, or his or her parent, has provided prior written consent for the disclosure of information.² In this case, a state education agency or postsecondary institution may simply transfer lists of student SSNs to a state UI agency (or another designee) without the need for direct oversight by an authorized state representative. Consequently, obtaining prior written consent can help alleviate bureaucratic roadblocks associated with conducting administrative record matching, although the end result of the process is the same.

Prior consent is established when an eligible student or parent signs and dates a statement that:

- Specifies the records that may be disclosed;
- States the purpose of the disclosure; and
- Identifies the party or class of parties to whom disclosure may be made.

State agencies may request student consent for disclosure, for example by asking students to indicate their privacy preference as part of the institutional intake or admission process for career and technical education (CTE) programs.³ And although FERPA protects individuals from unauthorized disclosure or misuse of their SSN, it does not dictate the types of information

¹ To date, the Department has not issued new guidance to cover the Perkins 2006 reauthorization, suggesting that the existing 2003 guidance continues to apply to the new legislation.

² An 'eligible student' is one who is either 18 years of age or older, or one who is attending a postsecondary institution at any age. For minors, consent must be obtained from a parent to disclose information.

³ See *Code of Federal Regulations* (34 CFR § 99.30(b)).

education agencies or institutions may collect from students or their parents. In particular, FERPA does not prevent a college or university from requiring students to provide their SSN as a condition of enrollment.⁴

Indeed, many school districts and postsecondary institutions routinely ask parents or entering students to provide a SSN during the enrollment registration process. To accommodate those who choose not to disclose this information, education agencies must offer individuals an opportunity to opt-out from information release.⁵ This usually entails having individuals complete an “Objection to Use” or “Refusal to Disclose” form.

Care should be taken to differentiate protected information, such as a SSN, from that designated as “directory information” by an educational agency or institution. This is because education agencies may disclose “directory information” without prior written consent from an eligible student or without providing direct supervision of student records if the specified information is not considered harmful or an invasion of privacy if released. The elements of directory information are designated by a school district or institution, and may include, but are not limited to a student’s:

- Name;
- Address;
- Dates of attendance;
- Degree obtained;
- Grade level;
- Photograph;
- Student status (full-time, part-time, undergraduate, graduate);
- Telephone number;
- Date and place of birth; and
- Participation in officially recognized sports and activities.

As with protected information, an eligible student or his or her parent may opt-out of disclosing directory information, meaning that this information may not be released for any purpose without prior written consent. The Department has provided states with guidance on allowing students to opt-out of releasing their directory information, and a copy of the memo is included in Appendix A of this report.

State SSN Collection Practices

A recent national survey of state K–12 data collection practices, conducted by the National Center for Educational Accountability, indicates that students’ SSNs are not routinely collected for educational purposes. According to the August 2006 survey, only 20 states collect and store SSNs as an element in students’ educational records, and just seven states—Alabama, Florida,

⁴ In a letter dated July 1, 2004, LeRoy S. Rooker, Director of the Family Policy Compliance Office, U.S. Department of Education, communicated that individuals may not use FERPA as grounds for filing a complaint if a university refused to enroll them because they did not disclose a SSN. The Director noted that other federal laws compel the disclosure of a SSN, but noted that some states have enacted laws to restrict the use of SSNs. A copy of this letter is included in Appendix B.

⁵ In particular, Section 7 of the Privacy Act (5 U.S.C. § 522a) stipulates that no person can be denied a right, benefit, or privilege provided by law because of the refusal to disclose a Social Security Number. Federal law also requires that agencies requesting Social Security Numbers inform the individual whether disclosure is mandatory or voluntary, by what statutory authority the number is requested, and what uses will be made of the number.

Georgia, Louisiana, North Carolina, Texas, and Tennessee—use SSNs as the primary student identifier for enrollment purposes.⁶

For example, in Tennessee, all students enrolling in public school must supply a SSN upon registration, which is used to track their transitions among schools and school districts and to produce information in response to statistical reports or surveys.⁷ Students refusing to provide a SSN are assigned a permanent personal identifier to take its place. Recently proposed legislation, however, would require the state to drop the use of SSNs and substitute a personal identification number to serve as a unique education identifier for all students.

Similarly, in Florida, state law requires all public school districts to request students to disclose their SSN when registering for school.⁸ The state also generates a unique student identifier that initially is matched to this number. For security purposes, the file that links the SSN to the unique student ID is stored centrally at the Florida Department of Education, separate from the rest of students' school records. This allows state education employees to match students' records to SSNs for accountability purposes, while protecting student privacy.

Although each state asks students to provide their SSN upon registration, they or their parents may refuse to disclose this information. In some states, such as Georgia, this is accomplished by having parents complete an “Objection to Use” form, or, in the case of Virginia, by simply declining to report the requested data. While there are some circumstances that compel the disclosure of a SSN at the postsecondary level, for example when a student applies for financial aid, higher education institutions usually inform students about the use of SSNs for research and analysis purposes under Student Right to Know policies. Examples of secondary Objection to Use and postsecondary Right to Know policies are provided in Appendix B.

Recommendations to Improve SSN Collection

Improving the collection of SSNs for secondary CTE concentrators in Arizona hinges on having students or their parents voluntarily disclose the number to school officials. Perhaps the most efficient approach would be to collect SSNs upon initial student enrollment in school. Given that there are no FERPA provisions that prevent asking individuals to disclose their SSN, state administrators may consider issuing guidance to school district administrators clarifying state collection procedures.

As an example of the type of guidance that may be provided, Appendix C provides an example of an informational memo originally sent out to Virginia school districts in 1988, and subsequently updated in 2003 to account for changes in state law. Clarifying federal law and acceptable approaches for collecting SSNs, as done in Virginia, can help remove any confusion at the local level as to what is, and is not permitted, when collecting protected student information.

If Perkins reporting does not provide sufficient justification for changing state policy on SSN collection, Arizona administrators might consider working with secondary CTE staff and faculty to improve SSN collection for CTE concentrators. This could be accomplished by providing information at statewide technical assistance workshops, providing models for SSN disclosure forms, or by developing an informational booklet that can be distributed to educators and parents,

⁶ Link to http://www.dataqualitycampaign.org/survey_results/elements.cfm#element1 to see a copy of state survey responses.

⁷ From Tennessee state statutes: 49-6-5101. Assignment of personal identification numbers.

⁸ From Florida state statutes: 1008.386. Social Security Numbers used as student identification numbers.

summarizing the reasons for collecting SSNs and rules governing their use. If desired, the state could also develop a form that eligible students or their parents could sign to authorize prior written consent for the release of their SSN; however, since education agencies or institutions can already disclose SSNs for Perkins reporting purposes without prior consent, this additional step may be unwarranted.

TRACKING STUDENTS USING ADMINISTRATIVE RECORD MATCHING

Arizona currently relies on local education agencies to report placement outcomes for career and technical education (CTE) completers using a state developed, locally administered survey instrument. This measurement approach undercuts data reliability, since collection strategies differ across agencies. For example, at the secondary level, one school district may contract with a single individual to conduct student follow-up, while another may base its reporting on teacher-generated reports. Postsecondary institutions also use differing approaches, with some community colleges working with the Department of Economic Security Employment Administration to match unemployment insurance (UI) wage data, while others use the state developed survey instrument.

Table 1: Secondary and Postsecondary Perkins Placement Survey Response Rates in Arizona: 2003-04

	Number Completers 2002-03	Number Completers Followed-up in 2003 -04	Number Completers Positively Placed in 2003-04	Number Completers in 2002-03 Missing (added) in 2003-04 Follow-up	Number Completers Not Positively Placed at Follow-up in 2003-04
Secondary	15,783	9,072	6,383	6,711	2,689
Postsecondary	2,861	5,077	1,659	(2,216)	3,418

Source: Consolidated Annual Report 2002-03 and OVAE Peer Collaborative Resource Network, www.edcountability.net. Accessed 5/15/07.

Data reported on the Office of Vocational and Adult Education’s (OVAE’s) Peer Collaborative Resource Network website indicate that Arizona administrators may have some difficulty tracking secondary CTE concentrators who complete their education and go on to some form of postsecondary experience.⁹ Of the 15,783 secondary CTE concentrators graduating in the 2002–03 academic year (i.e., the numerator of measure 2S1), 9,072 were identified for follow-up in 2003–04 (i.e., the denominator of measure 3S1).¹⁰ [Table 1] And of the number identified for follow-up, 6,383 unduplicated individuals were identified as placed in employment, advanced education, or the military (i.e., the numerator of measure 3S1). Consequently, the state was able to report a positive placement for 40 percent of individuals identified for follow-up in the year following their high school completion.

These statistics do not explain what became of the 6,711 CTE concentrators who completed high school in the 2002–03 academic year, but who were not identified for follow-up in the next year. Also unknown is the status of the 2,689 individuals in 2003–04 who were not found employed,

⁹ State data can be accessed at www.edcountability.net. Access to state data is password protected, with each state director given a user name and password. Contact Helen Bootsma at (602) 542-5093 for information on accessing state-level data.

¹⁰ Although states are now in the 2006–07 program year, data for the 2004–05 had not yet been released at the time of this memo. The state defines its placement measure as the “Percent of completers who leave secondary school in the report year, were at least enrolled in their third year of high school, and who were placed in postsecondary education or advanced training, employment and/or military service within 6–12 months.”

enrolled in postsecondary education, or in the military. If a large number of these students were successfully tracked and simply not placed, then the state may have relatively little to gain in expanding its statewide reporting to include out-of state completers for this group.

A review of postsecondary follow-up data paints a different picture. According to the OVAE website results, 2,861 CTE concentrators completed a postsecondary degree, certificate, or credential in the 2002–03 academic year.¹¹ However, postsecondary placement data for 2003–04 indicate that the state conducted follow-up of 5,077 individuals, 2,216 more than graduated the preceding year. To clarify the population included in the measure, state administrators may wish to review their reporting methodology with their OVAE Regional Accountability Specialist prior to finalizing measures for the new legislation.

For a modest cost, Arizona administrators could drop the use of surveys in favor of accessing centralized databases maintained by third party agencies. In particular, the state could tap into data maintained by the National Student Clearinghouse (Clearinghouse) to obtain data on CTE concentrators enrolling in postsecondary education or advanced training. State administrators could also obtain in-state employment data at no cost by accessing UI wage record data maintained by the Arizona Department of Economic Security. Data on federal employment could also be accessed free of cost using the Federal Employment Data Exchange System (FEDES), which provides information on civilian employees in federal jobs, those working for the U.S. Postal Service, and those serving in the military. The state should also consider working with the U.S. Department of Labor to access the Wage Record Interchange System (WRIS) data, should the opportunity present itself in the coming months.

National Student Clearinghouse

The Clearinghouse maintains student enrollment and degree attainment data for 2,900 higher education institutions that account for over 91 percent of college students in the U.S. Data exist for public and private 2-year and four-year colleges and universities, and most large trade, vocational, and proprietary schools.

In exchange for voluntarily submitting data on enrollment and degree completion, the Clearinghouse offers postsecondary agencies free access to a variety of services. For example, to free staff from responding to information requests, higher education institutions may refer enrollment and degree verification requests from employers, credit grantors, and other commercial vendors to the Clearinghouse for fee-based processing. Students and alumni may also be referred for transcript copies, as may banks and other agencies seeking to assess the enrollment status of financial aid students.

The Clearinghouse also offers StudentTracker, a fee-based service that provides up-to-date information on students' enrollment status and degree attainment in any institution included in its database. StudentTracker data can be used to address Perkins core indicators for secondary placement and postsecondary student completion, along with placement and retention in higher education or advanced training. And because longitudinal data exist for most institutions, state

¹¹ The state definition for postsecondary placement in 2003–04 was reported as the “Number of vocational program adult learners who: (1) completed a program in the reporting year; and (2) were placed in further postsecondary education, employment, and/or military service within three months after stopping participation in the program.”

and institutional administrators can track students who enroll anywhere in the country or who transfer among institutions, including those who make lateral transitions that might otherwise be classified as stopouts. A more detailed description of these services can be found in Appendix D.

Although Clearinghouse data can play an important role in responding to Perkins accountability measures, longitudinal information contained within the repository can also provide useful information that extends beyond Perkins. For example, in addition to tracking CTE concentrators' college placement two quarters following high school graduation, Clearinghouse data can also be used to assess all students' postsecondary persistence and time to graduation. This can help secondary educators gauge whether students who succeed in entering college have the skills necessary to complete their studies.

Accessing Clearinghouse Records

Clearinghouse matches are performed using directory information, such as a student's name, high school, birth date, and/or graduation date, to generate a probabilistic match with Clearinghouse records. States may also submit a SSN as part of a student record; however, FERPA rules prohibit Clearinghouse staff from using SSNs to identify students in third party institutions, effectively invalidating the use of SSNs for tracking students across institutions. According to Clearinghouse staff, probabilistic matching using directory information usually returns a hit rate of between 60 and 70 percent. The Clearinghouse also complies with FERPA regulations to ensure that student rights governing education records are protected, and as such, the agency provides only for the release of unblocked directory information unless FERPA authorizes release without consent.

Clearinghouse queries are initiated either through batch file exchange, in which agencies submit an electronic file containing information on multiple students, or via a secure password protected website for individual student queries. To initiate batch file exchange, the Arizona Department of Education would exchange files with the Clearinghouse via a secure file transfer protocol site, encoding data in either an Excel or flat file format.

Once the matching process is completed, the Clearinghouse would send the state a report containing an overview of match results and a detailed file containing individual student data.¹² This batch file—returned in a comma-delineated file (.CSV format)—would contain the following types of data:

- Institution name
- Institution location by state
- Institution type (i.e., less than 2-year, 2-year, or 4-year or higher institution)
- Institution affiliation (i.e., public or private)
- Attendance dates
- Attendance sequence (if multiple colleges attended, order in which attended)
- Enrollment status (i.e., full-time, half-time, less than half-time, leave of absence, withdrawn, deceased)

Colleges participating in the Clearinghouse's free online DegreeVerify program, which allows employers and others requesting degree verification to access Clearinghouse records, would also receive data on concentrators':

- Graduation status

¹² See Appendix A for a copy of the Student Detail Report Layout.

- Graduation date
- Degree title
- Degree major

To access CTE concentrator enrollment and completion data, state agencies or postsecondary institutions must subscribe to the StudentTracker service. Generally, costs for state level membership are higher than those for service providers, who are eligible for a price reduction if they regularly submit data to the Clearinghouse repository. Although high schools may also subscribe to StudentTracker services, relatively few districts currently participate.

Under the Clearinghouse pricing structure, fees for individual high schools run \$425 per school, irrespective of the number of students enrolled. Postsecondary institutions pay a fee based on the number of students they report as enrolled (i.e., fall headcount) for the Integrated Postsecondary Education Data System (IPEDS) reporting purposes. This fee allows subscribers to make an unlimited number of record inquiries during a 12-month period. Pricing levels fall into three categories, with institutions:

1. Paying an annual fee equal to the college's enrollment times \$0.10, with a minimum annual fee of \$300.
2. Paying half the annual fee (\$0.05 times enrollment or \$150 minimum) by participating in the free DegreeVerify and EnrollmentVerify services OR reporting additional data elements specified by the Clearinghouse.
3. Obtaining free access by participating in the free DegreeVerify and EnrollmentVerify services AND reporting additional data elements specified by the Clearinghouse.

Matching Strategies

Participation in the Clearinghouse is voluntary, meaning that not all colleges or universities currently submit student enrollment or graduation data. As shown in Table 2, not all Arizona postsecondary institutions contribute data to the Clearinghouse or subscribe to the EnrollmentVerify or DegreeVerify services. In particular, two large community colleges—Maricopa and Pima—have to date opted out of Clearinghouse participation.

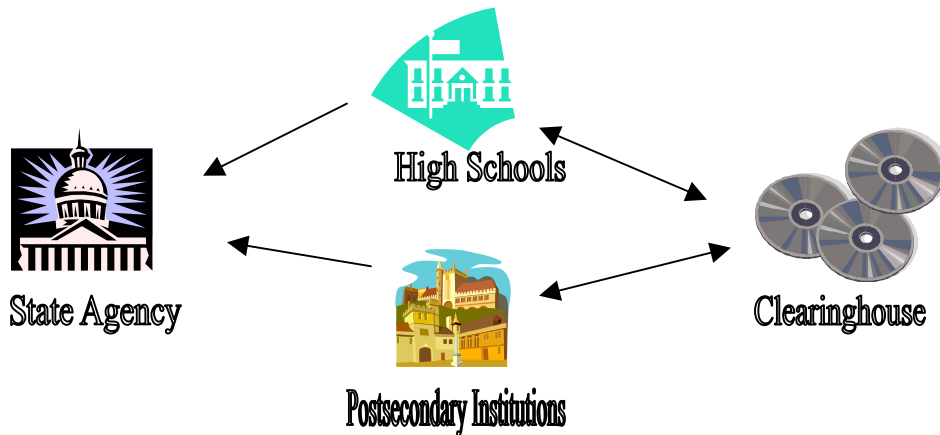
Colleges that opt not to participate for cost or other reasons negatively affect state capacity to track students. This is because students who enroll in a non-contributing institution cannot be identified. In the case of Maricopa and Pima, which enroll nearly two-thirds of the postsecondary student population identified in the state, this would severely undercut state administrative record matching capacity.

To make Clearinghouse participation feasible, Arizona state administrators may wish to consult with postsecondary administrators at non-participating institutions to determine why they are not contributing core data to the Clearinghouse. State administrators may also wish to consult with Clearinghouse representatives to determine whether it would be possible to offer some financial or other incentive to increase institutional participation, since it is also in the Clearinghouse's interest to obtain data on Arizona students.

Should ASDE choose to pursue administrative record matching with the Clearinghouse, state administrators have a number of options for structuring their relationship, including:

Option 1: Direct Institutional Contract with the Clearinghouse

Arizona could choose to have each secondary and postsecondary institution individually contract for StudentTracker services directly with the Clearinghouse. Given the service cost of \$425 per high school, the statewide cost of having all 376 high schools contract for individual services would approach \$160,000. Given that only 7 Arizona high schools currently contract with the Clearinghouse, it may not be cost effective for most secondary schools to contract for services unless the state had additional reasons, beyond Perkins, for asking high schools to track secondary student placements.¹³ As such, MPR recommends that for Perkins reporting purposes, Arizona administrators confine institutional contracts with the Clearinghouse to postsecondary institutions receiving federal Perkins funds.



Contracting for StudentTracker services may be more feasible at the postsecondary level, in part because the Clearinghouse provides discounts for institutions contributing student data. Although collegiate institutions are charged based on the total number of students reported in IPEDS fall enrollment, costs decrease if institutions participate in the DegreeVerify and EnrollmentVerify programs and/or collect additional data elements identified by the Clearinghouse. Postsecondary institutional researchers are also more likely than secondary administrators to understand how to use StudentTracker data for other, non-Perkins related purposes, which can extend the benefits of Clearinghouse participation.

Based on fall 2006 enrollment data, the approximate cost of subscribing the 41 postsecondary institutions that reported IPEDS enrollment data to StudentTracker would be approximately \$20,000 (See Table 2).¹⁴ This cost, which would be borne by individual institutions, is relatively inexpensive because many smaller colleges have enrollments of less than 3,000 students, meaning that they would incur the minimal charge of \$300 to contract for StudentTracker services.

Note that this estimate does not include the participation of colleges that did not report IPEDS enrollment for fall 2006 or colleges that were not recognized by the Arizona Commission on

¹³ These high schools include Agua Fria Union High School District in Avondale, Casa Grande Union High School District in Casa Grande, Deer Valley Unified School District in Phoenix, Mesa Unified School District in Mesa, Page Unified District in Coconino, Santarita High School in Tucson, and Scottsdale Unified School District in Scottsdale.

¹⁴ Note that this estimate assumes that colleges participating in the DegreeVerify and EnrollmentVerify program would qualify for a 50 percent discount. This cost would fall if these colleges were also reporting additional data elements requested by the Clearinghouse.

Higher Education. A listing of these colleges is included in Appendix E. If these identified colleges were to participate in the Clearinghouse, then costs would be adjusted based on their enrollment.

Table 2: Arizona Colleges Participating in the National Student Clearinghouse, by Service Type: 2007

IPEDS Number	Institutional Name	Enrollment ¹	NSC Participation Level			Approximate Fee
			Core Service ²	Enrollment Verify	Degree Verify	
423643	Midwestern University	20	✓			\$ 300
104188	Art Center Design College	45				\$ 300
105242	Mundus Institute	48				\$ 300
105589	Prescott College	59	✓	✓	✓	\$ 150
105163	ITT Technical Institute-Tucson	117	✓	✓		\$ 300
363934	University of Advancing Technology (UAT)	170				\$ 300
428444	Art Institute of Phoenix	176				\$ 300
104717	Grand Canyon University	178	✓	✓	✓	\$ 150
105172	ITT Technical InstitutePhoenix Career College	207	✓	✓		\$ 300
104531	DeVry Institute of Technology	299	✓	✓		\$ 300
262341	Conservatory of Recording Arts and Sciences	345				\$ 300
103644	Everest College-Phoenix	372				\$ 300
104586	Embry-Riddle Aeronautical University	403	✓			\$ 300
407009	Arizona State University West	539	✓	✓	✓	\$ 150
103723	Collins College (Formerly AI Collings Graphic Design School)	819				\$ 300
103893	Apollo College	1,095				\$ 300
262332	Scottsdale Culinary Institute	1,200				\$ 300
106102	Western International University	1,649	✓	✓	✓	\$ 150
105297	Diné College	1,825	✓	✓		\$ 300
404426	Coconino County - Coconino Community College (District Headquarters: Flagstaff)	2,018	✓	✓	✓	\$ 150
105349	Navajo County - Northland Pioneer College (District Headquarters: Holbrook)	2,408				\$ 300
104577	Graham County - Eastern Arizona College (District Headquarters: Thatcher)	2,429				\$ 300
105206	Mohave County - Mohave Community College (District Headquarters: Kingman)	2,815				\$ 300
105330	Northern Arizona University	2,846	✓	✓	✓	\$ 150
106148	Yavapai County - Yavapai College (District Headquarters: Prescott)	3,352	✓	✓	✓	\$ 168
104346	Pinal County - Central Arizona College (District Headquarters: Coolidge)	3,796	✓	✓	✓	\$ 190
104160	Yuma/LaPaz Counties - Arizona Western College (District Headquarters: Yuma)	4,404	✓	✓		\$ 440
104179	University of Arizona	6,009	✓			\$ 601
104151	Arizona State University	7,894	✓	✓	✓	\$ 395
105525	Pima County - Pima Community College (District Headquarters: Tucson)	19,993				\$ 1,999
105136	Maricopa County - Maricopa Community Colleges (District Headquarters: Tempe)	70,025				\$ 7,003
Total Arizona IPEDS Post-Secondary Enrollment		137,555				
Total Number of current Arizona Student records available to Clearinghouse subscribers		35,615				
Percent of current Arizona Student records available to Clearinghouse subscribers		26%				
Cost of Institutional Contracting with Clearinghouse		\$ 20,095				

*Source: Arizona Commission on Higher Education

¹Total undergraduate enrollment as of Fall 2006, where available

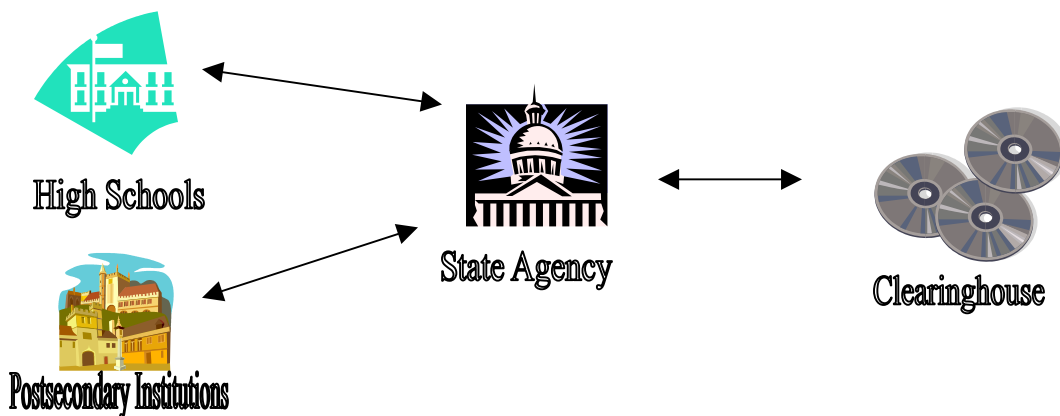
²As of April 3, 2007; Core Participant data is available to StudentTracker users

Reporting procedures would be relatively simple. Since record matching would occur at the institutional level, postsecondary institutional researchers at each institution would submit a batch file containing unique identifiers, comprised of directory information, for all CTE concentrators to the Clearinghouse. Clearinghouse representatives would return a list of concentrators found in the national database along with their enrollment information and, for institutions participating in the DegreeVerify program, the graduation status of students.

Institutional researchers would analyze Clearinghouse data and report to the state agency the number of CTE concentrators who were either retained in their original institution, found at another postsecondary institution, or reported as having completed their postsecondary education at either their originating or another institution. State personnel would aggregate this data across institutions and enter these statistics into the federal Consolidated Annual Report used for Perkins reporting purposes.

Option 2: Statewide Contract with the National Clearinghouse

A second option involves the Arizona Department of Education establishing a direct relationship with the Clearinghouse to conduct Perkins administrative matches. To assess CTE concentrator outcomes, state administrators would compile directory information on CTE concentrators sent to them by either high school or college administrators. The state would then send a single batch file to the Clearinghouse, which would attempt to match listed students against its national database. A file containing positive matches would be returned to state administrators, who would report this information for Perkins accountability purposes.



This approach would be particularly efficient at the secondary level, since it would be more cost effective to have a single state agency conduct administrative matches than to have each individual high school contract with the Clearinghouse at the \$425 per school rate. Assuming that the Clearinghouse were to charge its posted rate of \$0.54 per match, in 2003–04 the state would have incurred a cost of just under \$5,000 to follow-up on the 9,072 CTE concentrators identified in the denominator of the placement measure in the 2003–04 program year.¹⁵ The state agency may also be able to negotiate a different fee structure with their

¹⁵ Note that this cost would climb to approximately \$8,500 if the state were to follow-up on the 15,732 CTE concentrators who completed high school in 2002–03, as reported by the state on the federal Consolidated Annual Report.

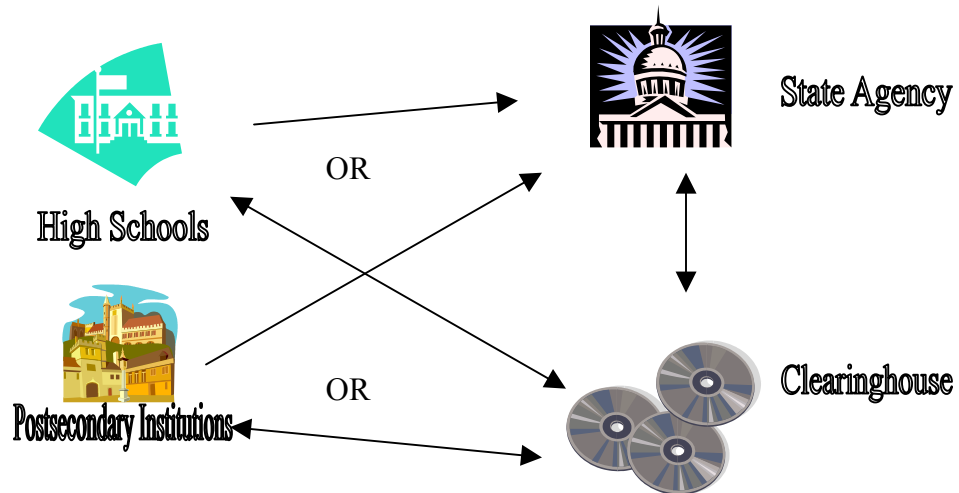
Clearinghouse representative, depending upon the number of concentrator records to be submitted annually and the difficulty associated with generating student matches.

This approach could also prove cost effective at the postsecondary level, for though the state would not be eligible for the same fee discounts afforded to postsecondary institutions, the number of students that would be followed-up would be substantially less than total statewide enrollment. Assuming that the Clearinghouse were to charge its posted rate of \$0.54 per match, in 2003–04 the state would have incurred a cost of approximately \$2,741 to follow-up on the 5,077 CTE concentrators identified in the denominator of its postsecondary placement measure.

While using Clearinghouse services could reduce local data burden associated with conducting surveys, there are a number of drawbacks to this approach. One drawback is that the conduct of administrative matching, with the state as an intermediary, would only provide one-time access to Clearinghouse data. State administered matching would also add another layer of bureaucracy to the reporting system, since postsecondary institutions would still be required to submit batch files containing CTE concentrators to the state using the file structure identified by the Clearinghouse. Postsecondary institutions not interested in obtaining StudentTracker services would, however, be spared the cost of contracting with the Clearinghouse, although it would be beneficial if they agreed to submit enrollment and degree data to the Clearinghouse.

Option 3: Statewide Contract—Direct Institutional Contact with National Clearinghouse

A third option entails the state contracting directly with the Clearinghouse on behalf of each secondary school and/or postsecondary institution in the state. With this approach, secondary schools and/or collegiate institutions would either conduct statewide matches directly with the Clearinghouse or forward a batch file containing the names of CTE concentrators to the state, which would communicate directly with the Clearinghouse.



For example, the Wisconsin Technical College System pays a fee of \$0.12 for every student reported in IPEDS to the Clearinghouse on behalf of each college listed in IPEDS. The state and all of the 16 colleges in the state then have access to the Clearinghouse data for Perkins, as well as other educational reporting functions. Technical College administrators have worked, in collaboration with college administrators, to develop a state level database to track students in a college program to see where they go if they leave before graduating. Colleges also have access

to enrollment data via direct data submission to the Clearinghouse to conduct their own institutional research.

Other states, such as California, have contracted with the Clearinghouse to provide all colleges with access to StudentTracker services. Volume discounts have reduced state costs, such that the state pays roughly half the quoted rate established by the Clearinghouse. In contrast, a third party organization in Maine has contracted with the Clearinghouse to provide all high schools in the state with free access to the StudentTracker system. However, to date, only 79 of 290 school administrative units have signed up for services.

Establishing a statewide contract with the Clearinghouse to collect secondary data would entail having the Arizona Department of Education agree to have each high school district in the state sign a contractual agreement to submit data to the Clearinghouse. The state department would be the central repository of these agreements until all high schools had submitted a signed agreement. The state would then submit the agreements to the Clearinghouse and work with high schools to report data using the proper data upload. Once signed agreements from each high school, along with a graduation file were submitted, the Clearinghouse would give the state a substantial price break for system use.

According to a Clearinghouse representative, the cost of establishing a statewide contract would be \$0.75 per high school graduate. Assuming that the state had roughly 60,000 graduates, the state would face a fee of approximately \$45,000, versus the \$160.00 cost of having each high school contract individually. It is important to note, however, that this price would be available only if the state were able to guarantee the participation of all high schools in Arizona, and produced both a signed agreement and graduation data for all schools.

Costs at the postsecondary level would vary depending upon state conditions. At the time this memo was produced, the Clearinghouse representative was unable to provide a detailed price quote. Assuming that the Clearinghouse were to institute a charge of \$0.10 per record, the state would face a cost of approximately \$13,750 to provide all statewide colleges with Clearinghouse access. To obtain more concrete figures, state administrators should consult with Clearinghouse representative Dannette Sullivan. She can be reached via telephone at (206)-324-3228, or by e-mail at: sullivan@studentclearinghouse.org.

Federal Employment Data Exchange System

The Federal Employment Data Exchange System (FEDES) is a pilot initiative, funded through a grant to the state of Maryland by the U.S. Department of Labor, to assess the feasibility of conducting administrative record matches using state and federal data. The system is intended to assist states in identifying individuals employed by federal agencies so that they can respond to performance-reporting requirements contained in federal programs. Since FEDES is funded using federal resources, there is no cost to states seeking to participate in the system.

The system functions as a secure information pass-through that allows states to access federal, civilian, and military employment records maintained by the Office of Personnel Management, the United States Postal Service, and the Department of Defense. Since records in these databases are not included in the nation's UI wage record system, states must either use FEDES or establish relationships with each federal agency to identify individuals in federal employment.

Agreements executed with the Office of Personnel Management and the United States Postal Service allow states to use returned data to respond to federal and state performance measurement, consumer reporting, and evaluation research activities required by federal law or regulation, state law or regulation, or the United States Office of Management and Budget. The agreement with the Department of Defense allows states to use military data to support only federal performance measurement, consumer reporting, and evaluation research activities required by federal law or regulation, or the United States Office of Management and Budget.

Two agencies oversee the data exchange process. Administrative management is handled by Maryland's Department of Labor, Licensing and Regulation, which provides legal support to states seeking to join FEDES and serves as a liaison between state and federal agencies. The Jacob France Institute at the University of Baltimore handles technical operations associated with the data exchange process.

Accessing FEDES

To access FEDES, Arizona would need to establish a signed data sharing agreement with the Maryland Department of Labor, Licensing and Regulation, which would conduct administrative matching on its behalf.¹⁶ Once an agreement has been executed, the state representative would be placed on the FEDES mailing list, so that he or she would receive information and notices relating to FEDES participation.

To conduct matches, Arizona would submit student records for administrative matching once per quarter following the FEDES data-exchange cycle. Data transmission would occur using secure file transfer protocol (SFTP), with data sent to a secure, password protected web portal so that no other state would have access to state files.¹⁷

Records are matched using individuals' SSNs as the unique identifier, meaning that Arizona would need to collect SSNs from each program participant to receive matched data. Each record also must include a state identifier and, if applicable, a discretionary program identifier, since a SSN may be identified within multiple states during a defined time period.

About a week following the file submission deadline, the Institute creates a combined state file for delivery to the federal Office of Personnel Management, the United States Postal Service, and the Department of Defense. Approximately two weeks later, these agencies return files containing matched records to the Institute. Institute staff creates a sub file with each state's matched records, and announces a window of opportunity for states to perform a secure download.

This data transmission window opens about 1–2 weeks after the federal agencies provide matched records. Since the Institute is not a data warehouse, files are stored on the secure server only during the data-transfer window, after which they are destroyed. The total turnaround time from state submission of records to the return of matched records to each state is about one month. Matched data returned by federal agencies cover the eight most recent quarters, lagged three months.

¹⁶ To obtain a copy of the data sharing agreement or to inquire further about FEDES, state administrators should contact Janet Staveley at (410) 837-6552 (jstaveley@ubalt.edu).

¹⁷ SFTP is similar to FTP, but it encrypts both commands and data, preventing passwords and sensitive information from being transmitted in the clear over the Internet. Arizona would be provided a copy of the SFTP software by the Institute, along with instructions and technical assistance in its use. Alternatively the state could save data onto a password-protected CD, which could be sent via FedEx to the Institute.

Although states may submit a large number of CTE concentrator identifiers to the Institute, only data on matched records are returned. A great deal of detailed information is contained within matched records, with data elements varying among federal agencies. Appendix F lists the types of information provided for each record for which a match is generated.

WAGE RECORD INTERCHANGE SYSTEM

The Wage Record Interchange System (WRIS) was created by the federal government to assist states in responding to performance and reporting requirements contained in the Workforce Investment Act of 1998 (WIA) and programs authorized under the Wagner-Peyser Act. The WRIS serves as a clearinghouse for state Unemployment Insurance (UI) wage record data, which states may access to track the employment outcomes for individuals who participated in a state workforce investment program and subsequently left the state. States volunteering to join the WRIS agree to share UI wage record data with the Clearinghouse and other states, and in return, may access wage record data from participating members.

Until the summer of 2006, the National Association of State Workforce Agencies administered the WRIS; however, in July 2006 the Employment and Training Administration (ETA) took over WRIS administration and governance. During the transition, eleven states withdrew from the WRIS over administrative concerns. Over time, six of these states have rejoined, and new states have signed on. As of April 2007, a total of 30 states and territories were participating.

Arizona is one of the states currently using the WRIS for WIA reporting purposes. Participating states and territories include:

Alaska	Maryland	Oklahoma
Arizona	Minnesota	Oregon
Arkansas	Mississippi	South Dakota
District of Columbia	Missouri	Texas
Florida	Montana	Utah
Idaho	Nebraska	Virginia
Illinois	Nevada	Washington
Indiana	North Carolina	West Virginia
Kansas	North Dakota	Wisconsin
Kentucky	Ohio	Wyoming

Since WRIS data are only available for states participating in the WRIS, individuals employed in states not referenced above would not be available for employment tracking purposes. This could have implications for Arizona, given that three bordering states—California, Colorado, and New Mexico—do not participate in the WRIS.

To participate in the WRIS, a state must sign a contract with the ETA that specifies the conditions and procedures governing data access. Under the agreement, states identify a State Unemployment Insurance Agency (SUIA) that holds wage data, irrespective of whether the agency also administers the state's UI program, and a Performance Accountability and Customer Information Agency (PACIA), or agencies, designated by the governor, with responsibility for coordinating performance assessment under WIA.

Assessing the WRIS Clearinghouse

The WRIS Clearinghouse operates as an intermediary among states. Each state SUIA submits data to the Clearinghouse for all individuals with employer-reported wages in a given time period. State data are entered into the Clearinghouse database, which maintains wage record data

for up to eight quarters. This database contains only three information items: (1) an individual's Social Security Number (SSN), (2) the quarter for which wages have been reported, and (3) the name of the state holding the detailed wage record information.

When wage record data are needed, for example to prepare for a federal accountability report, a state PACIA transmits a request file to the WRIS Clearinghouse that contains the SSNs of individuals for whom employment data are needed. Clearinghouse staff performs a record match against the centralized database to identify whether there are any wage data associated with the submitted SSNs, and matched records are noted. WRIS staff consolidates PACIA requests into state-level queries, which are then sent to each SUIA holding associated wage data. These queries, which consist of lists of SSNs, may include requests from different state PACIA for information held by a single SUIA.

Once a SUIA receives a query, it attempts to match the SSNs in the file against information held in its own database. A response file, containing the requested wage record data for identified SSNs, is returned to the WRIS Clearinghouse, where staff extracts wage record data and converts it into aggregate statistical data. These data can be used by a PACIA to prepare performance and management reports for programs covered by the WRIS. Once a data request has been fulfilled, a state PACIA has 14 days to download the information; after this time, the WRIS Clearinghouse automatically purges the file from its server.

The WRIS Data Sharing Agreement advises that a PACIA may make requests for wage record data for the following purposes:

1. To obtain Wage Data for performance and reporting requirements for state and local programs within the jurisdiction of the Department of Labor, including those authorized under: (i) Title I of the Workforce Investment Act; (ii) Section 403(a)(5) of the Social Security Act (42 USC 603(a)(5)); (iii) Chapter 2 of Title II of the Trade Act of 1974 (19 USC 2271 et seq.); (iv) Wagner-Peyser Act programs, and (v) Chapter 41 of Title 38 of the United States Code;
2. To allow the PACIA or other state agency to assess the performance of individual training providers under the Workforce Investment Act;
3. To allow the PACIA to obtain Wage Data used to satisfy the performance and reporting requirements for the Job Corps Program, Senior Community Service Employment Program, Migrant and Seasonal Farm Worker Program, Native American Program, Veterans Workforce Investment Program, Youth Build Program, Registered Apprenticeship Program, Prisoner Reentry Initiative Grant Program, H-1B Technical Skills Training Grant Program, and the Community-Based and High-Growth Job Training Initiative Grant Program;
4. To allow the PACIA or other state agency to address performance and reporting requirements set forth in state statute for programs and activities identified in subparagraphs 1 through 3 of this paragraph C;
5. To obtain data for research and evaluation;
6. To allow the PACIAs to comply with requirements affecting expansion of the WRIS that is set forth in any of the following: (i) federal law; (ii) regulations promulgated by the Secretary of Labor; and, (iii) policy determinations issued by the Secretary of Labor;

7. As may be necessary to assist ETA with administering and managing the WRIS; and,
8. As may be necessary to assist the Operations Contractor with operating and troubleshooting the WRIS.¹⁸

Although the Data Sharing Agreement does not stipulate the use of WRIS data for Perkins purposes, in her Transmittal Letter of November 7, 2006, Emily DeRocco, Assistant Secretary for Employment and Training, U.S. Department of Labor, encouraged states to make use of the WRIS to help build an integrated workforce investment system. In particular, her transmittal letter noted:

“Educational agencies are a critical partner in this enterprise and require access to the same resources to report performance data as workforce agencies. I strongly urge you to consider designating your state agency as an additional PACIA covered by this data agreement.”¹⁹

The reference to educational agencies using the WRIS was added to the transmittal record in the hope that states would expand their use of WRIS data to more fully document the performance of their workforce investment system.

According to John R. Beverly, Administrator, Office of Performance and Accountability, U.S. Department of Labor, the question of whether states are authorized to access the WRIS to collect performance data identified in the Perkins Act is an unresolved issue. Since Perkins is not explicitly listed among programs identified in Section 3 of the Data Sharing Agreement (see above), ETA has not yet given formal permission for states to access the WRIS for Perkins reporting purposes. However, since no federal provision prohibits states from using WRIS data to assess Perkins or any other federal or state workforce program, so long as confidentiality provisions are maintained, the potential for states to use the WRIS for Perkins reporting still exists. According to Mr. Beverly, the U.S. Department of Labor is currently considering whether to open WRIS for Perkins reporting purposes, which will require proposing an amendment to the current data sharing agreement. Until formal approval is granted, he recommends that states not access the WRIS for Perkins accountability purposes.

It is worth underscoring that any state that belongs to the WRIS can propose an amendment to the Data Sharing Agreement for consideration by other states. As such, Arizona state administrators may wish to consider offering an amendment to the WRIS to allow PACIA to submit queries to the Clearinghouse for Perkins reporting requirements. This would likely require consultations with staff at the Arizona SUIA, as well as other state administrators.

Using WRIS Data for Perkins Reporting in Arizona

Assuming that ETA opens the WRIS for state Perkins reporting purposes, state staff should have little difficulty tracking the employment outcomes of secondary and postsecondary CTE concentrators who migrate to other participating states. The state would follow a similar process

¹⁸ These criteria are drawn from the WRIS Data Sharing Agreement with March 2007 Proposed Amendments, posted on the U.S. Department of Labor website. This document was accessed on 4/27/07 at www.doleta.gov/Performance/WRIS%20Data%20sharing%20Agreement%20with%20March-07_Amendments.pdf

¹⁹ <http://www.doleta.gov/Performance/WRIS%20Transmittal%20letter%20FINAL%2011-07-06.pdf> accessed on 4/27/07.

to access WRIS data, with the exception that SSNs for secondary CTE concentrators would be packaged into a data request file submitted by the Arizona UI wage record SUIA to the WRIS Clearinghouse. Once a response from other SUIAs were received, staff from the WRIS Clearinghouse would share aggregated wage record data with the Arizona UI wage record agency, which in turn, would forward this information to state administrators after stripping concentrators' SSNs from the file.

APPENDIX A:
Opt-Out Form for Directory Information

FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA) MODEL NOTICE FOR DIRECTORY INFORMATION

The *Family Educational Rights and Privacy Act* (FERPA), a federal law, requires that [School District], with certain exceptions, obtain your written consent prior to the disclosure of personally identifiable information from your child’s education records. However, [School District] may disclose appropriately designated “directory information” without written consent, unless you have advised the District to the contrary in accordance with District procedures. The primary purpose of directory information is to allow the [School District] to include this type of information from your child’s education records in certain school publications. Examples include:

- A playbill, showing your student’s role in a drama production;
- The annual yearbook;
- Honor roll or other recognition lists;
- Graduation programs; and
- Sports activity sheets, such as for wrestling, showing weight and height of team members.

Directory information, which is information that is generally not considered harmful or an invasion of privacy if released, can also be disclosed to outside organizations without a parent’s prior written consent. Outside organizations include, but are not limited to, companies that manufacture class rings or publish yearbooks. In addition, two federal laws require that local educational agencies (LEAs) receiving assistance under the *Elementary and Secondary Education Act of 1965* (ESEA) provide military recruiters, upon request, with three directory information categories—names, addresses, and telephone listings—unless parents have advised the LEA that they do not want their student’s information disclosed without their prior written consent.²⁰

If you do not want the [School District] to disclose directory information from your child’s education records without your prior written consent, you must notify the District in writing by [insert date]. The [School District] has designated the following information as directory information: **[Note: an LEA may, but does not have to, include all the information listed below.]**

- Student’s name
- Participation in officially recognized activities and sports
- Address
- Telephone listing
- Weight and height of members of athletic teams
- Electronic mail address
- Photograph
- Degrees, honors, and awards received
- Date and place of birth
- Major field of study
- Dates of attendance
- Grade level
- The most recent educational agency or institution attended

²⁰ These laws are: Section 9528 of the ESEA (20 U.S.C. 7908), as amended by the *No Child Left Behind Act of 2001* (P.L. 107-110), the education bill, and 10 U.S.C. 503, as amended by section 544, the *National Defense Authorization Act for Fiscal Year 2002* (P.L. 107-107), the legislation that provides funding for the Nation’s armed forces.

APPENDIX B:
Objection to Use Forms:
Georgia Refuse to Disclose
Oregon Opt-Out Form



**STATEMENT OF OBJECTION TO THE USE OF
 SOCIAL SECURITY NUMBER
 FOR**

STUDENT IDENTIFICATION

I do not wish to have the social security number of my child/children placed in the school records of the Cobb County School District.

The names of my children and the school they attend are as follows:

_____	_____
Name of first child	School

_____	_____
Name of second child, if appropriate	School

_____	_____
Name of third child, if appropriate	School

_____	_____
Name of fourth child, if appropriate	School

_____	_____
Name of fifth child, if appropriate	School

 Signature of Parent/Guardian

 Date

Sworn to and subscribed before me,

This _____ day of _____, 20_____.

 Notary Public

 Date of Expiration of Notary
 Public Appointment

APPENDIX C:
Virginia Guidance Memos

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF EDUCATION
P.O. BOX 2120
RICHMOND, VIRGINIA 23218-2120

SUPTS. MEMO NO. 92
May 30, 2003

INFORMATIONAL

TO: Division Superintendents

FROM: Jo Lynne DeMary
Superintendent of Public Instruction

SUBJECT: Use of Social Security Numbers for School
Enrollment

The purpose of this memorandum is to notify school divisions of a change in the requirement that parents provide school divisions with a social security number for each student at the time of enrollment in school. During the 2003 General Assembly, House Bill 1716 was passed amending § 22.1-260 of the Code of Virginia. This section of the Code, as amended, continues to require each student to present a federal social security number within 90 days of his or her enrollment and to require the Board of Education to promulgate guidelines for determining which students are eligible to obtain social security numbers. The following change was made, however, regarding students whose parents are unable or unwilling to provide a social security number for them:

In any case in which a student is ineligible, pursuant to these guidelines, to obtain a social security number or the parent is unwilling to present such number, the superintendent or his designee may assign another identifying number to the student or waive this requirement.

The Board of Education provided school divisions with the *Guidelines for Administering the Requirement for Public School Students to Obtain a Social Security Number* on June 15, 1988, via Supts. Memo No. 125 INFORMATIONAL (attached). These guidelines permit a division superintendent to waive the social security number requirement and assign a student an alternative number for

identification under certain circumstances including the following:

- a student, along with his parents, by reason of bona fide religious training or belief, is conscientiously opposed to having a federal social security number;
- the student's application for a social security number would require disclosure of his illegal immigration status to a federal agency; and
- the student is a member of a non-immigrant family that is legally temporarily living in the United States, such as families whose members are employed in embassies or in other international organizations.

The 2003 amendment to § 22.1-260 of the Code now provides that the requirement may be waived or another identifying number be assigned in instances where the student is ineligible to receive a social security number or the parent is unwilling to present a social security number for the student.

There are additional requirements that govern the requests for social security numbers for students from parents. No child may be excluded from school for failure to provide a social security number. Section 7 of the Privacy Act (found at 5 U.S.C. § 522a note) requires that no person be denied a right, benefit or privilege provided by law because of his refusal to disclose his social security number. This law also requires agencies that request social security numbers to inform the individual whether disclosure is mandatory or voluntary, by what statutory authority the number is requested, and what uses will be made of the number. Finally, section 2.2-3808 of the Code of Virginia makes it unlawful for any agency to require an individual to disclose or furnish his or her social security number "not previously disclosed or furnished, for any purpose in connection with any activity, or to refuse any service privilege or right to an individual wholly or partly because the individual does not disclose or furnish such number, unless the disclosure or furnishing of such number is specifically required by state or federal law."

If you have questions, please contact Cynthia A. Cave, director of policy, at (804) 371-0558 or at ccave@pen.k12.va.us.

JLD/MJP/cb

Attachment

<http://www.pen.k12.va.us/VDOE/suptsmemos/2003/inf092a.pdf>

APPENDIX D:
National Student Clearinghouse Information

APPENDIX E:
Arizona Colleges Not Reporting IPEDS Enrollment
or Not Recognized by the
Arizona Commission on Higher Education

Colleges without an IPEDS Number, but recognized by Arizona Commission on Higher Education

Advanced Computer Technology Training (ACTT)
American Indian College of the Assemblies of God
Arizona Heart Institute foundation
Arizona School of Health Science
Arizona School of Massage Therapy
Arizona School of Professional Psychology
Arizona Technical Institute
CRM Airline Training Center
Desert Institute of the Healing Arts
Desert Rose Christian College
Discovery Detective Academy
DRA Software Training
Education America
Fleur De Lis Institute of Landscape Design and Construction
Fuller Seminary Southwest
ICM TEC (Technical Education Center)
IKON Office Solutions - Education Services
Institute of Natural Therapeutics Inc.
Keller Graduate School of Management
Kino Institute
Knowledge Alliance
MindWorks Professional Education Group, Inc.
Mobile Dynamics
New Horizons Computer Learning Center
North-Aire, Inc.
Northcentral University
Park College
Phoenix Career College
Phoenix Therapeutic Massage College
Quantum Helicopters, Inc.
RainStar University
Sawyer Aviation
Southwest Flight Center
Southwestern Conservative Baptist Bible College+
Sun West Aviation
Sweetwater Bible College
Tech Skills
Tucson Aeroservice Center
University of Phoenix Adult Education
University of San Francisco
University of St. Francis
Wayland Baptist University
Western Bible Institute

Colleges Identified As Having an IPEDS Number but no Enrollment in Fall 2006

Academy of Radio & Television Broadcasting
Arizona Automotive Institute
Arizona College of Allied Health
Arizona School of Acupuncture and Oriental Medicine
Chaparral College
Cochise County - Cochise College - (District Headquarters: Douglas)
Everest College - Mesa
Garvin School of International Management
International Institute of the Americas
Long Technical College
Long Technical College-East Valley
Ottawa College
Pima Medical Institute
(Pima Medical Institute-Mesa)
Refrigeration School, Inc. & RSI Training International, Inc., The
Southwest College of Naturopathic Medicine and Health Science
Southwest Institute of Healing Arts
The Bryman School
(Bryman School East)
University of Phoenix-Online
University of Phoenix-Hohokam
University of Phoenix-Southern Arizona campus

Colleges with an IPEDS Number, but Not Recognized by Arizona Commission on Higher Education

American Indian College of the Assemblies of God Inc
American Institute of Technology
Argosy University-Phoenix Campus
Arizona Academy of Beauty Inc
Arizona Academy of Beauty-North
Arizona Board of Regents
Arizona State University at the Downtown Phoenix Campus
Arizona State University at the Polytechnic Campus
Artistic Beauty Colleges-Chandler
Artistic Beauty Colleges-Flagstaff
Artistic Beauty Colleges-Glendale
Artistic Beauty Colleges-Phoenix
Artistic Beauty Colleges-Phoenix North Central
Artistic Beauty Colleges-Prescott
Artistic Beauty Colleges-Scottsdale
Artistic Beauty Colleges-Tucson
Artistic Beauty Colleges-Tucson North
Carsten Institute
Charles of Italy Beauty College
College America
Cortiva Institute-Desert Institute of the Healing Arts
Cortiva Institute-School of Massage Therapy
DeVoe College of Beauty
Earls Academy of Beauty
East Valley Institute of Technology
Golf Academy of Arizona
Hair Academy of Safford
HDS Truck Driving Institute
High-Tech Institute-Phoenix
International Academy of Hair Design
International Baptist College
Lamson College
Maricopa Beauty College LLC
Maricopa Skill Center
Phoenix Institute of Herbal Medicine & Acupuncture
Remington College-Tempe Campus
Roberto-Venn School of Luthiery
Southwest Skill Center-Campus of Estrella Mountain Community College
Southwestern College
Tohono O'Odham Community College
Toni & Guy Hairdressing Academy
Tucson College
Tucson College of Beauty
Tucson Design College
Turning Point Beauty College
Universal Technical Institute of Arizona Inc
Universal Technical Institute-Motorcycle Mechanics

APPENDIX F:
Federal Employment Data Exchange System
Data Elements

Data Elements included in the FEDES Record Match

I. Office of Personnel Management

- Social Security Number
- Agency of employment
- Occupation code/name
- Pay plan
- Grade
- Adjusted basic pay
- Basic pay
- Total pay
- State of employment
- Work schedule code
- Begin date
- End date

II. United States Postal Service

- Social Security Number
- Location of Postal Employment (City, state, zip code, zip-4)
- Occupation title
- Pay grade
- Base rate of pay (annual salary, salary rate code)
- Date entered on duty

III. United States Department of Defense

- Social Security Number
- Flag identifying whether record is Active Duty or Civilian file or no match found

Active Duty:

- Last Name
- First Name
- Middle Name
- Suffix or Cadence
- Date of Birth
- Uniformed Service Pay Grade Code
- Taxable wages
- Primary DOD Occupation Code
- Primary Service Occupation Code
- Duty DOD Occupation Code
- Duty Service Occupation Code
- Secondary DOD Occupation Code
- Secondary Service Occupation Code
- Accession Training Service Code
- Service Branch Classification Code
- Duty Unit Location Country Code
- Duty Unit Location (State Code)
- Duty Unit Location (US ZIP Code)
- Active Federal Military Service Years
- Uniformed Service Initial Entry Date
- Enlisted Active Service Agreement
Begin Calendar Date
- Active Military Service Base Calendar Date
- Transaction Effective Calendar Date
- Enlisted Active Service Projected End
Calendar Date (ETS of Minimum Service)

Civilian:

- Service (Agency)
- Bureau
- Pay Plan
- Rank or GS rating
- Occupational Series
- Duty Location - Country
- Duty Location – State
- Separation Date