

Impact of Directory Information Blocks on StudentTrackerSM Results

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Contents

Introduction.....	2
About FERPA (Family Educational Rights and Privacy Act)	2
Commitment to Privacy.....	2
Implications for Research	3
Methodological Notes	3
Determining Which Students Have Directory Information Blocks.....	3
Institution-Level Blocks	3
Definitions	4
Results Summary	4
By Institutional Characteristics.....	5
By Student Characteristics.....	6
Conclusion	7

Introduction

About FERPA

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all institutions that receive funds under an applicable program of the U.S. Department of Education.

Generally, institutions must have written permission from the parent or eligible student in order to release any information from a student's education record. However, FERPA allows institutions to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.31):

- Institution officials with legitimate educational interest;
- Other institutions to which a student is transferring;
- Specified officials for audit or evaluation purposes;
- Appropriate parties in connection with financial aid to a student;
- Organizations conducting certain studies for or on behalf of the institution;
- Accrediting organizations;
- To comply with a judicial order or lawfully issued subpoena;
- Appropriate officials in cases of health and safety emergencies; and
- State and local authorities, within a juvenile justice system, pursuant to specific State law

Institutions may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, institutions must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the institution not disclose directory information about them (ed.gov).

Commitment to Privacy

The Clearinghouse has maintained the confidentiality and privacy of the student records in our care since our inception in 1993. We are scrupulous in our concern for student privacy and compliance with the Family Educational Rights and Privacy Act (FERPA), which protects students' privacy rights in their education records.

In 2015, the Clearinghouse further pledged to safeguard student privacy by signing the Student Privacy Pledge sponsored by the Software & Information Industry Association (SIIA) and The Future of Privacy Forum. This pledge establishes a set of commitments regarding the collection, maintenance, and use of student personal information.

We require all verification requestors to certify that the student or alumnus has applied for employment or for a product or service dependent on student or alumni status. Requestors also agree not to re-release degree data to third parties (unless the requestor is a background screening firm releasing data to their employer client).

The Clearinghouse only releases directory information that confirms an individual's degrees and academic credentials. We do not confirm addresses or the accuracy of Social Security numbers provided by requestors. To

further ensure security and privacy, we maintain an audit trail of requestors' identities, including Internet Protocol Addresses (IP address), credit card numbers, and telephone numbers.

Implications for Research

The StudentTracker service produces three response files for each request: a control report, an aggregate report, and a detail report. The control report provides metadata pertaining to the request, the aggregate report includes summary totals for the entire cohort of students in the request, and the detail report provides student-level enrollment and degree records. The counts displayed in the aggregate report are not affected by directory information blocks because no student-level data is provided in this report. However, since the detail report *does* contain student-level data, directory information is blocked in this report if that is the preference of the student or institution. It is important for a researcher to understand how frequently directory information is blocked, and whether it is blocked consistently across geographical regions, institutional sectors, and student demographics.

Methodological Notes

Determining Which Students Have Directory Information Blocks

A student may invoke a directory information block at any institution attended, at any time, by notifying institution officials in writing. The institution will then update the directory block indicator for the student in its next scheduled data submission to the Clearinghouse. As a result, blocks are both institution-specific and time-sensitive. In order to determine a student's current preference regarding the display of directory information, the Clearinghouse must identify the most recently submitted value of the directory block indicator for any student/institution combination. It is the most recently submitted value that determines whether StudentTracker will display directory information for a given student/institution combination. It is important to note that both enrollment and degree submissions contain a directory block indicator, so both types of records must be searched to identify the most recently submitted indicator.

Institution-level Blocks

In addition to student-level blocks, directory information may also be blocked at the institution-level (i.e. for all of an institution's students). Institution-level blocks are rare, affecting less than 1 percent of all student/institution combinations over the last three years. However, they can be an important factor if a research project is focused on a very specific cohort that is heavily dependent on a single postsecondary institution. The state-level analysis provided in the appendices includes information on the largest institutions, by state, invoking these kinds of blocks.

The various types of institution-level blocks are listed below. In this analysis, the first two types of blocks listed below are not taken into account, because they only block a single data element.

- Blocking of the enrollment status field
- Blocking of the address field
- Blocking to educational organizations requestors
- Blocking to other institution requestors
- Blocking also occurs if the institution is unable to accurately report student-requested blocks

Definitions

In this analysis, the following definitions are used:

- **Institution:** Uniquely distinguished by the 8-digit OPE-ID submitted with the block flag. An institution's branch, if reporting data to the Clearinghouse separately, is considered a separate institution in this analysis. Each institution has its own profile in the Clearinghouse system, and this profile was used to determine its level, control, and sector. The profiles for a few institutions did not contain a control indicator. These institutions were not included in the breakdowns by control or sector, but were included in other breakdowns. Lastly, private institutions without a known profit type were categorized as "Private - other".
- **Directory Block Indicator:** A student was considered blocked at a particular institution if his/her *most recent* block indicator is "Y" or "H". If the student's most recent block indicator is "N" or blank, the student was considered unblocked.
- **Academic Year:** The student was counted in a given academic year if they were enrolled in any term having at least one date falling between July 1 and June 30 of a given academic year. Three recent academic years were evaluated: 2012-13, 2014-15, and 2016-17.
- **Race/Ethnicity:** The student's race/ethnicity as provided by participating institutions. Although this element is currently optional and only partially populated (about 56 percent of 2016-17 enrollments have the field populated), its distribution was similar to that of the national postsecondary population (when compared to figures obtained from the IPEDS Data Center).

Results

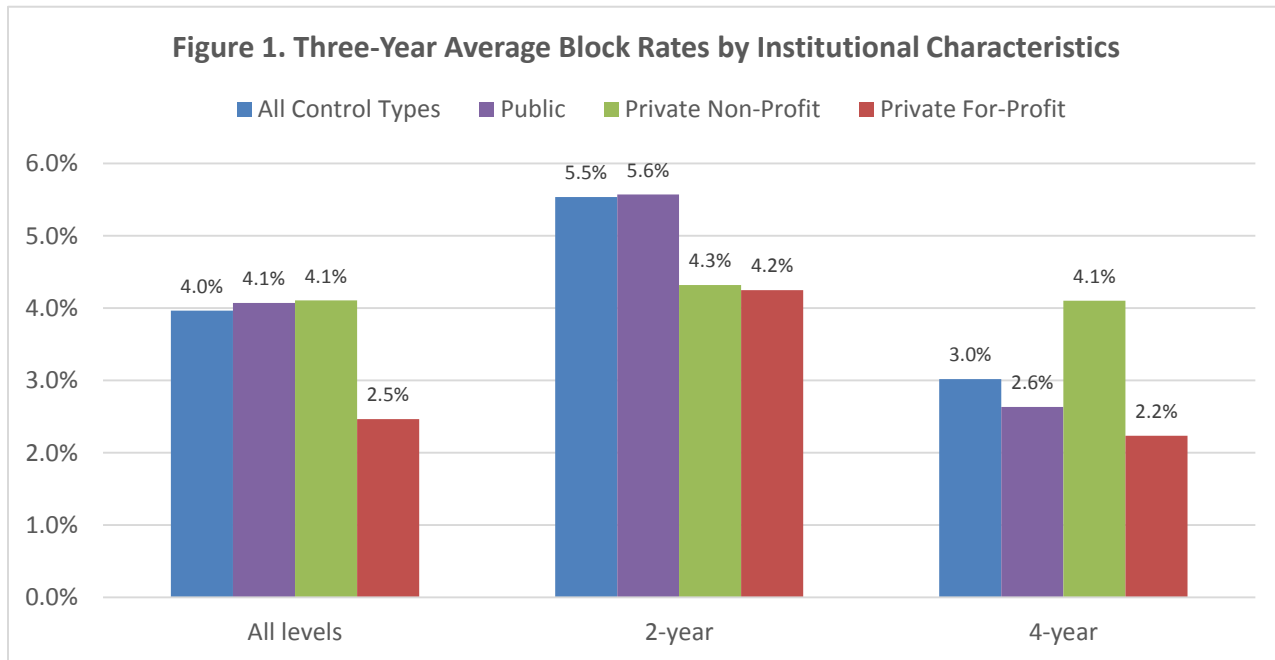
The National Student Clearinghouse's postsecondary data comprise current and historical enrollment and degree records for students who enrolled at one or more participating institutions. Because directory information blocks are institution-specific, we may count a student multiple times, once for each institution attended. This analysis focused on three recent academic years: 2012-13 (27,863,519 student/institution combinations), 2014-15 (27,693,209 student/institution combinations), and 2016-17 (27,130,807 student/institution combinations). **The average block rate for all three academic years was 3.96 percent of the population** — 4.10 percent for 2012-13, 4.07 percent for 2014-15, and 3.72 percent for 2016-17.

The block rates varied greatly across states. Six states had three-year average block rates over five percent: California (11 percent), Puerto Rico (9 percent), Wyoming (9 percent), Texas (8 percent), Arizona (8 percent), and Delaware (6 percent). On the other hand, eleven states and District of Columbia were determined to have three-year average block rates lower than one percent: Connecticut, District of Columbia, Hawaii, Idaho, Michigan, Nebraska, New Jersey, Oregon, Pennsylvania, South Carolina, South Dakota, and Virginia.

Note: Detailed state-level results tables are provided in Appendix B of this document.

Institutional Characteristics

Figure 1 shows the national breakdown of directory information blocks by institutional characteristics. The percentages in the chart represent averages for the three years studied.

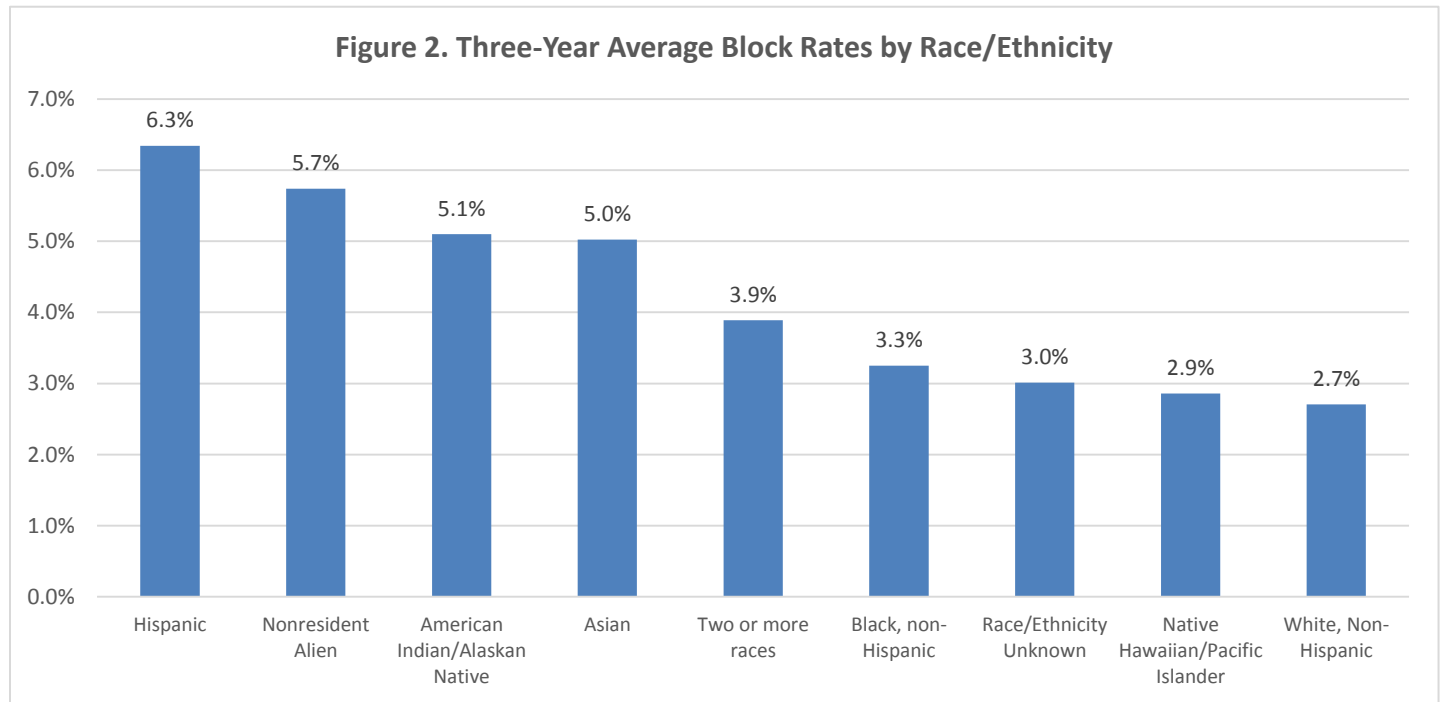


Nationally, students are blocked more often at two-year institutions than at four-year institutions. This pattern was seen in many states, but not all. In some extreme cases, such as Arizona, Delaware, and California, students at two-year institutions were blocked at three-year average rates (22 percent, 18 percent, and 13 percent, respectively) that were three to four times the national rate for two-year institutions.

When evaluating by institution control, blocks were more prevalent in Public and Private Non-Profit institutions than in For-Profit institutions. Nationally, students enrolled at For-Profit institutions were blocked at rates that were 1-2 percentage points lower than at other institutions. But once again, there were exceptions in particular states. In Kentucky, for example, students at Public institutions were blocked at a much lower three-year average rate (0.3 percent) than students at Private For-Profit institutions (24 percent).

Student Characteristics

Figure 2 shows the rate of directory information blocks based on the student's race/ethnicity as reported by participating institutions. The percentages in the chart represent averages for the three years studied.



Note: In Figure 2, the "race/ethnicity unknown" category represents individuals who were reported in the unknown category by institutions. Individuals attending institutions that do not report race/ethnicity to the Clearinghouse are excluded from the figure.

The breakdowns by race/ethnicity revealed some differences in block rates among the various groups. The group with the highest block rate (Hispanic) was found to be blocked at a rate approximately double that of the two groups with the lowest block rates (Native Hawaiian/Pacific Islander and White, non-Hispanic).

State-level / Institution-level Data

Although the national directory information block rate is only 3.96 percent (average for three selected years), there is a great deal of variation among states and across institutional sectors. Frequently, research studies focus on particular cohorts or outcomes, such as students enrolling in four-year public institutions in the state of Virginia. Researchers working with student-level data returned in the StudentTracker detail report should take into account the block rates for the segments of the student population being studied.

An accompanying Excel workbook includes three tabs. The first tab lists all institutions with a block rate of at least 10 percent and cumulative enrollments of at least 1,000 for the three years studied. The second and third tabs provide detailed results tables summarizing directory information block rates nationally, and for each of the 50 states, District of Columbia, Puerto Rico, Guam, and Virgin Islands. Breakdowns by race/ethnicity are included at a national level only, but breakdowns by institutional characteristics are included for every state. This attachment may be downloaded from the [NSC Research Center website](#).

References

U.S. Department of Education. Family Educational Rights and Privacy Act (FERPA). Retrieved on 11/16/2017 from <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

National Center for Education Statistics. Integrated Postsecondary Education Data System (IPEDS) Data Center. Retrieved on 11/16/2017 from <http://nces.ed.gov/ipeds/datacenter/>