The Best Data that Money Can't Buy Student Data for Partisan Political Advantages

Verity Vote

Summary

Political campaigns strive for the most accurate and up-to-date lists of voters and of potentially eligible but unregistered voters (EBU). The largest tranche of potentially eligible new voters supportive of Democrat candidates is young people, and the most comprehensive database of young people resides in the federally protected records of high schools and universities.

College and university administrators have, for more than a decade, authorized the disclosure of this sensitive and highly valuable private data of students to a Democratexclusive voter data company. Whether done knowingly or unwittingly, the practice raises significant concerns about violations of the Family Educational Rights and Privacy Act (FERPA), the federal statute that safeguards the privacy of student data and educational records. The National Student Clearinghouse (NSC), a relatively unknown non-profit, has positioned itself to obtain this protected student data from over 97% of all universities and over 70% of all high schools in the United States.

In response to an Obama administration call to action in 2012, Tuft's Institute for Democracy in Higher Education (IDHE) formed a partnership with the NSC "to measure the voting and registration rates" of students. The IDHE mission is to "focus explicitly on 'all things political' on college and university campuses."

Politically active non-profits funded by Democrat donors have been encouraging university officials to sign an agreement allowing National Student Clearinghouse to circumvent the FERPA protections and share students' private data with IDHE and an unnamed "third party vendor" in order to increase registration and election turnout of students. The third party vendor of choice from inception until recently has been Catalist, the Democrat's exclusive voter data provider. Tufts maintains a relationship with Catalist but also has an agreement with L2 Political for analysis of the NSC data.

Catalist ingested the data from the NSC, merged it with the existing records in Catalist and provided a report on the matched data and the "records uploaded by the client that did not match the existing Catalist database." The "did not match" records are some of the most valuable of all EBUs because they were previously invisible to political data aggregators.

Participation in the IDHE study, called The National Study of Learning, Voting, and Engagement (NSLVE), is imposed under plans set in motion by Civic Nation. Their conteststyle get-out-the-vote campaigns on college campuses include awards for effective action plans and achievement of particular voter participation rates. Action plans must include campus participation in the NSLVE.



The identity of the "third party vendor" used for the NSLVE is not disclosed to university officials on the NSLVE authorization form. Nor is the political mission of that vendor revealed when university officials are encouraged to authorize NSC to share the data under the "studies exception" of FERPA. University officials may have been duped into authorizing disclosure of highly sensitive private student data to a partisan private corporation that works exclusively with Democrats and progressives under the guise of a dubious "study exception" to FERPA's prohibitions against sharing of the data.

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Youth & Student Voting

Within the last decade, the youth vote has emerged as a significant determinant in elections. Youth turnout has been increasing¹ and their support for Democrats is also growing. In 2022, youth vote gave a +28% margin to Democrats.² There are many factors that contribute to the disparity, but records show that Democrats could be gaining a systemic advantage through access to the best student data that money can't buy.

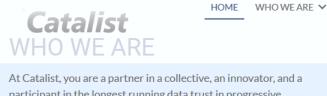
Value of Data for Campaigns

The Obama campaign apparatus was renowned for its sophisticated use of voter and potential voter data, analytics, and microtargeting. Obama's campaign manager, David Plouffe, said that the only way Democrats can win is by having superior lists of potential voters. "The perfect list is the aspiration of all political campaigns ... We must ...ensure that our lists are as close to perfect as possible ... **This is the only way we can win**."³

Plouffe's comments support the notion that elections are won by identifying the right people to target for registration efforts and the right people to target for get out the vote (GOTV) and ballot chasing efforts. Statistics show that nearly 80% of newly registered voters will vote in the election cycle during which they register. With up-to-date, highly reliable lists of voters and potential voters, campaigns and organizations need not waste time or money on voters who have a low likelihood of supporting their candidates or a low likelihood of turning out to vote. This enhanced method of targeting leads to more efficient and cost effective registration and GOTV programs.

Catalist – Democrat and Progressive Asset

Microtargeting is only as good as the voter data files that inform it. A complete, accurate and timely file that is "as close to perfect as possible" can be the most valuable asset for a candidate or political party. George Soros likely knew that value when he founded Catalist LLC in 2005. Catalist is the longest running political data aggregator and their resources are made available only to Democrats and progressive organizations.



At Catalist, you are a partner in a collective, an innovator, and a participant in the longest running data trust in progressive politics.

Our commitment is to strengthen the progressive community year after year by growing and maturing this community asset and related technology and services. We do this by providing our data only to Democrats and progressives, and only for civic engagement purposes, not for commercial for-profit uses. And, we are able to do so without threat of this data asset being bought, sold, or traded for commercial or for-profit purposes.

GROWING THE PROGRESSIVE DATA ECOSYSTEM Our Data team works with all of our partners in the progressive ecosystem to identify and evaluate new sources of data and IDENTIFY NEEDS &

SET GOALS

Fig. 1: Catalist advertises that they are building an asset to strengthen the progressive community and they only provide data to Democrats and Progressives.⁴

information that will be the foundation of robust and

effective programs.

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From the Catalist website: "Our data and models are continually improved with data returned to Catalist by our partners and clients. This virtuous circle ensures the national file is more accurate and more powerful for our clients."

Catalist works with "partners in the progressive ecosystem to identify and **evaluate new sources of data**..." In building Catalist as the best, most perfect "enhanced national voting-age person database" that money could buy, one limitation became apparent. While all states make lists of registered voters publicly available, an accurate list of unregistered persons proved to be elusive, as that enormously valuable data is not commercially available and cannot be bought.

Elusive Data of Young People

Unregistered voters are somewhat invisible to commercial data aggregators and some portions of the eligible but unregistered population are particularly difficult to capture. In fact, the most desirable of the unregistered demographics, young people, are largely absent from commercial data files and are much more likely to be invisible. This portion of the population tends to be more transient, and many young people have no credit history and have no utilities in their name — which are two primary sources of commercial data. However, this coveted list of potentially eligible but unregistered voters <u>does</u> exist in databases that are protected by federal privacy laws.

Most Comprehensive Database of Young People

The most comprehensive list of young people that exists in any database is collected by the National Student Clearinghouse. This relatively unknown 501c4, nongovernmental organization receives highly sensitive personal data on every student enrolled in participating institutions. NSC is the largest provider of education verification and transcript ordering services in the country. The NSC describes the rationale for the collection of this extraordinary volume of federally protected personal information, "the Clearinghouse uses this data for enrollment reporting of Title IV schools to the National Student Loan Data System ("NSLDS"), enrollment reporting to private lenders, verification of student enrollment and credentials earned, transcript services, course exchange, and research."⁵

The NSC website boasts that their database includes data on 97% of all college students and 70% of all high school students. The educational institutions transfer 109 unique fields of personal data for each student to NSC. This data includes name, date of birth, social security number, email, phone number, and financial aid information. (See Appendix A for complete list of student data fields.) As an NGO, there is very little transparency or accountability with the National Student Clearinghouse.

Student Clearinghouse Partnership to Measure Student Voting

In response to a 2012 Obama administration call to action, Tuft's University formed a partnership with the National Student Clearinghouse "to measure voting and registration rates" of students. That national call to action was published in a report entitled <u>A</u> <u>Crucible Moment: College Learning and Democracy's Future</u>. "Higher education has a

distinctive role to play in the renewal of U.S. democracy...this report argues that colleges and universities are among the nation's most valuable laboratories for civic learning and **democratic engagement**...with this report we call on the higher education community...to embrace civic learning and **democratic engagement as an undisputed educational priority**." Democratic engagement is often used interchangeably with the term Get Out the Vote.

This partnership between Tufts and NSC provides a mechanism to measure the effectiveness of initiatives to increase student turnout. Voter registration and student voting are measured by Tufts' Institute for Democracy and Higher Education's (IDHE) National Study of Learning, Voting and Engagement (NSLVE). "NSLVE is the first and only study to objectively examine student and institution-level data on student voting."

Federal Privacy Law Protects Student Data

The Family Educational Rights and Privacy Act (FERPA) is the federal law that protects the privacy of student data and education records including those records collected by the National Student Clearinghouse. FERPA was enacted to safeguard the privacy of students' records and promote transparency and accountability in educational institutions, ensuring that students and their families have control over their personal information. This federal privacy law regulates the collection, storage, and disclosure of educational records, requiring schools to obtain written consent from parents or eligible students before disclosing personally identifiable information.

FERPA differentiates student data as Directory or Non-Directory. Non-directory data includes social security numbers, student identification numbers, parent name and address, race, gender, GPA, and financial aid information. Non-directory student data cannot be released without prior written consent from the student. Directory information, which also contains sensitive private data such as name, DOB, and phone number can be released under certain circumstances.⁶

Progressive organizations and left of center non-profits have been encouraging university officials to sign an agreement allowing the National Student Clearinghouse to circumvent FERPA protections and share the non-directory and directory data with "third party vendors."⁷

Democrat Funded Organizations Encourage FERPA Workaround

One such organization, Civic Nation, is led by former members of the Obama administration. One of their "initiatives that create a more inclusive and equitable America" is the All In Campus Democracy Challenge. In 2022, they recruited over 1000 colleges and universities from all 50 states, which included nearly 10 million students. The Challenge is a contest-style get-out-the-vote campaign which includes awards for effective action plans and achievement of particular voter participation rates.⁸



As part of the All In Action Plans, university administrators are lobbied to measure the level of student voter registration and voter participation through the NSLVE. Civic Nation describes NSLVE as "a service to colleges and universities interested in learning about their students' voting habits." Civic Nation Action Plans **must** include campus participation in the NSLVE.

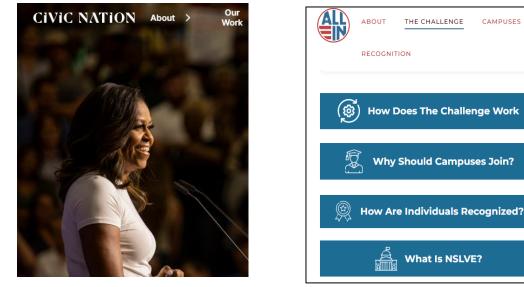


Figure 2 Civic Nation seeks to "shift culture, systems and policy." Their All In Campus Challenge requires participation in NSLVE to measure student turnout.^{8,9}

Participation in the NSLVE requires university officials to sign an authorization form allowing the National Student Clearinghouse to share protected student data. The agreement says that IDHE "will use this dataset to study student registration and voting rates, along with comparisons with appropriate reference groups. Any such data elements provided by the Institution to the Clearinghouse that are non-directory shall be provided pursuant to the Studies Exception to the Family Educational Rights and Privacy Act ("FERPA"), 34 C.F.R. §99.31(a) (6)"

Exception Cited Does Not Include Voter Registration or GOTV

The FERPA exception cited includes the following description:

§99.31(a) An educational agency or institution may disclose personally identifiable information from an education record of a student without the consent required by §99.30 if the disclosure meets one or more of the following conditions:

(6) (i) The disclosure is to organizations conducting **studies** for, or on behalf of, educational agencies or institutions to:

(A) Develop, validate, or administer predictive tests;

(B) Administer student aid programs; or

(C) Improve instruction.¹⁰

Measuring the success of voter registration or GOTV activities does not logically fit into any of the study categories from §99.31(a)(6) of FERPA. Voter registration is not a

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requirement for student aid, it does not improve academic instruction and it does not assist with predictive tests.

Tufts' description of the study clearly shows that it is measuring voter registration and voting rates only. They do not collect any data regarding instruction and the reports produced do not include any measure or analysis of instruction. Study results include only student voting rate information which appears to fall short of the exception's requirements.

Dear Colleagues:

We are pleased to send this tailored report containing your students' voting rates for 2020. This report contains three years of relevant topline data: 2016, 2018, and 2020. As always, we disaggregate the data so you can better identify and address gaps in participation.

Figure 3 Introduction to the NSVLE Report for each university. The report contains student voting rate statistics, but no information related to instruction.

Tufts Describes the Transfer of the FERPA Protected Student Data

The NSLVE service provided to colleges and universities is a measurement of voting and registration rates. Tufts reportedly uses "the Institution's de-identified enrollment data for publishing aggregate reports regarding student civic learning and engagement in democracy which do not identify Institution."

The "third party" vendor described in the NSLVE agreement has been Catalist. Tufts IDHE has more recently also partnered with L2 Political for voter data matching to enable a more robust geographical matching process. The reports produced for the university are deidentified and Tufts reports that the FERPA protected data from the National Student Clearinghouse is only used by the third party. IDHE explained the rationale for a data vendor in the Creating and Maintaining the National Study of Learning, Voting, and Engagement Database Report:¹¹

"Catalist updates their registration records several times a year from each jurisdiction, which improves the accuracy of the data. Catalist contracts with and collects information from credit card companies, consumer surveys, and government sources to improve its matching capability. Catalist also deduplicates records by linking records of the same person listed in a state's voter file more than once and runs all records through the Post Office's National Change of Address Registry to identify movers. This information is helpful for understanding, for instance, whether college students register to vote after they have moved to a college campus or whether they remain registered at their home address."¹¹

Clearinghouse Data Uploaded to Catalist Database

In order to evaluate the registration status and voter history of 10 million students from participating universities, the National Student Clearinghouse uploaded their records to



Catalist. Catalist, the Democrat's exclusive voter data aggregator, ingested the millions of student records to match them with their comprehensive database of state voter files.

Once the two sets of records were merged, Catalist reported on the matched data, including a "confidence score indicating the level of confidence that student in Clearinghouse database was correctly matched to voting records in Catalist database" and "**records uploaded by the client that did not match the existing Catalist database**."¹¹ The "did not match" records are some of the most valuable of all EBUs because they were previously invisible to political data aggregators.

The sharing of directory and non-directory data shared with the third party vendor has no legally authorized purpose and appears to violate FERPA. Despite the assurance that the third party vendor will delete data that it did not already have, there is no FERPA exemption for temporarily receiving and manipulating the data. There is also no mechanism to verify deletion of the NSC data from the vendor's database.



Figure 4 Slide from IDHE NSLVE Presentation¹²

Tufts Relationships with Voter Data Aggregators

In the Fall 2020 Methodology Update, Tufts announced that they were utilizing L2 Political as their voter data aggregator.¹³ L2 does not have the same restrictions related to customer ideology and it sells data to both Republican and Democrat campaigns and organizations engaged in political campaign activities. However, Tufts maintains its relationship with Catalist for analysis and reports produced by their Center for Information and Research on Civic Learning and Engagement (CIRCLE). The data sources listed include the "voter data file aggregated by Catalist."¹⁴

Database of Over 50 Million College Students

Tufts boasts that their database includes information on over 50 million college students and former college students. Each year of the NSLVE, Tufts adds approximately 10 million individual students to their database. Tufts reports that the student files are de-identified by removing names, identification numbers and month and day of birth. However, this is superficial de-identification, the collection of attributes retained in the data can be used to identify individuals just as the cookies on your browser can be used to identify you.

Deidentified Data Risks

In the 2020 NSLVE methodology update, Tufts makes claims about "prioritizing student confidentiality." First, it asserts that sensitive student data is not "retained by the matching algorithm service." In this case, L2 Political voter data reportedly deletes the student files that were uploaded by NSC. Second, Tufts reports that the "matched files are deidentified by Clearinghouse" before transmitted for NSLVE reporting.

An Office of the Director of National Intelligence report, declassified in June 2023, reveals how de-identified data can easily be re-identified with minimal attributes.¹⁵ For example, a University of Virginia student, female, freshman, Hispanic, Economics major, born in 2006 are just some of the de-identified data fields Tufts retains from NSC data. Using just those limited attributes, it would be possible to identify the student by name. As the DNI warns, there is significant risk associated with the disclosure of "de-identified" data because it is unlikely to fool a well-trained statistical model.

Lack of Disclosure to University Officials

The identity of the third party vendor was not and is not disclosed to university officials in the NSLVE FERPA authorization document. Perhaps if Tufts had provided complete transparency to officials regarding the disclosure to the Democrat's exclusive campaign data aggregator, the officials would have been reluctant to turn over the sensitive data of their students. A letter from the US House Judiciary Committee rebuked the use of an "explicitly partisan Democratic data company, Catalist"¹⁵ by a government agency that is supposed to be impartial. The letter also pointed out that it is difficult for the public to "have faith in neutrality and impartiality" and using Catalist would create the "stench of partisan electoral politics."¹⁶

University officials have a right to transparency to make an informed decision regarding authorization to bypass federal privacy laws to enrich a political data company. The value of the student data to campaigns is immeasurable. Fair-minded, non-partisan officials should be afforded full disclosure prior to sharing the social security numbers, DoB, name, address, phone, email, parent information or financial aid data with third party organizations that use data for partisan political advantage.^{17,18}

Conclusion

The data that students and parents share with universities is deeply personal and highly sensitive and is incredibly valuable to political actors. It is imperative that students, parents, and university officials take a closer look at state and federal privacy laws as there are legal and ethical questions that should be addressed. Some have suggested that NSC could technically be designated a consumer reporting agency subject to the Fair Credit Reporting Act.¹⁹ Students should have the right to consent or withhold consent before their private information is shared with a politically active third party corporation that uses data to help campaigns make "detailed person-by-person" determinations about **which young people** should be targeted for registration and GOTV.²⁰



Endnotes

1. <u>https://www.michigan.gov/sos/resources/news/2023/04/17/report-michigans-youth-turnout-in-the-2022-election-was-best-in-the-nation</u>

2. <u>https://circle.tufts.edu/2022-election-center#youth-prefer-democrats-by-28-point-margin</u>

- 3. Plouffe, David. A citizen's guide to beating Donald Trump New York: Viking, 2020.
- 4. <u>https://web.archive.org/web/20210204141502/https://catalist.us/</u>
- 5. <u>https://www.studentclearinghouse.org/about/</u>
- 6. <u>https://studentprivacy.ed.gov/ferpa</u>
- 7. https://archive.org/details/2023-2033-nslve-reauthorization-long-form
- 8. https://civicnation.org/about/
- 9. <u>https://slsvcoalition.org/slsv-checklist/</u>
- 10. <u>https://studentprivacy.ed.gov/node/548/</u>
- 11. https://archive.org/details/idhe-nslve-data-report-2017
- 12. <u>https://www.youtube.com/watch?v=gyLDt9GSuml</u>

13. <u>https://web.archive.org/web/20211206054743/https://tufts.app.box.com/v/idhe-fall-2020-methodology</u>

14. https://www.tufts.edu/; https://circle.tufts.edu/explore-our-data/youth-voting-andcivic-engagement-america#data-sources

1<u>5.https://web.archive.org/web/20230614202829/https://s3.documentcloud.org/documents/23843212/odni-declassified-report-on-cai-january2022.pdf</u>

1<u>6.https://web.archive.org/web/20170614031142/http://judiciary.house.gov/_files/news</u>/pdfs/Smith%20to%20Holder%207%205%2012.pdf

17. <u>https://news.gallup.com/poll/508352/americans-confidence-higher-education-down-sharply.aspx</u>

A Gallup Poll conducted in June 2023 shows that Americans' faith in universities continues to wane and reveals that only 36% of American's have confidence in higher education. Although confidence fell across all demographics, Republicans' trust dropped 20 points since 2018 to just 19%.



18. <u>https://alert.studentclearinghouse.org/</u>

Also not disclosed to academic administrators was the fact that MOVEit software used by NSC to transfer data, had a security vulnerability. The vulnerability was exploited in 2023 and resulted in a massive breach of student records housed at the Clearinghouse. University officials should be cautious of every subsystem, software, connection, and user account that has any possible access to the student data they are charged with protecting. NSC provided updates related to the security incident on their website.

19. <u>https://casetext.com/case/robinson-v-natl-student-clearinghouse</u>

In Robinson v. National Student Clearinghouse, the plaintiff filed a class action lawsuit against the National Student Clearinghouse alleging that NSC was a Consumer Reporting Agency and had violated the Fair Credit Reporting Act (FCRA). Before the NSC had submitted a single brief, the parties asked the judge to stay proceedings while they negotiated a settlement agreement. Through mediation, the parties reached an agreement that created a \$1.9 million settlement fund. One of the class members objected to the settlement agreement and appealed to the US Court of Appeals. In the court's unanimous decision, they wrote: "Robinson's class action complaint raised an issue of first impression about whether an entity like NSC is a CRA regulated by the FCRA. The parties also disputed whether NSC's self-verification reports qualify as "consumer reports" under the FCRA. No court had yet ruled on whether an entity like NSC is subject to regulation under the FCRA." (First Circuit No. 20-1783)

20. Plouffe, David. A citizen's guide to beating Donald Trump New York : Viking, 2020.

"So not too long ago, certainly through the 1990s, GOTV consisted of sending mail, telephoning, and knocking on the door of everyone in a high-performing Democratic precinct – a college community, say, or an urban center –and encouraging each and every one of them to vote. Of course we knew that even the strongest Democratic precinct is, say, 85 percent or even 90 percent loyal, still leaving a chunk of vote for the Republican regardless of who calls them or shows up at the front door...Think about the inefficiency...Such were the limitations of the data and technology back then. Today we have the ability to take into account consumer and behavioral data and make detailed person-by-person and house-by-house distinctions to find the needle who may behave electorally different from the haystack."

End of Report

Submitted July 13, 2023

Revised July 20, 2023



Header Record Layout

For fixed width format: Total header record length is 1250 bytes.

For Excel/Text Tab Delimited format: Total Header record length is 8 columns.

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	
A	Record Type	2	01	02	R	AN	Value is "A3" for enrollment data files, i.e., Early Registration, First of Term, Subsequent, Grads Only, and Summer, Value is "P3" for advanced registration data (used by schools active with Myhub or Student Self-	
							Service)	
В	School Code	6	03	08	R	N	Dept. of Education "FICE" code (OPE ID)	
С	Branch Code	2	09	10	R	N	School branch code suffix or 00, if none	
D	Academic Term	15	11	25	R	AN	Institutionally defined name of academic term for the reported data (e.g., Fall 2006, 1st Quarter 2006, 1st Semester 2006)	
E	Standard Report Flag	1	26	26	R	A	Y= Standard Report, no special handling N= Non-standard report (e.g., early registration, summer terms, graduates only, or advanced registration)	
F	Certification Date	8	27	34	R	N	Date enrollment data was certified by school (YYYYMMDD)	
G	Reporting Level	1	35	35	R	Α	Value for full reporting is "F" Value is "A" for add records (advanced registration only)	
Н	Filler	1215	36	1250	R	AN	Space fill	

The type codes in this document are "A" alpha, "N" numeric, and "AN" alpha numeric.

The "Req'd" column in the layouts displays the required codes in this document, which are "R" required, "C" conditional, and "O" optional. Conditional means that in certain circumstances, the field is required. The file layout or indicated exhibits provide additional information.

For assistance, contact implementation@studentclearinghouse.org.

Enrollment Reporting Programming and Testing Guide 02/21/2023

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Detail Record Layout

For fixed width format: Each detail record must be 1250 bytes in length. For Excel/Text Tab Delimited format: Total Detail Record length is 109 columns.

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
A	Record Type	2	1	2	R	AN	Value for each detail record is "D1"	
В	Student SSN	9	3	11	R	N	Numbers only, no hyphens. If no SSN is available, fill with "NO SSN" followed by trailing spaces.	
С	First Name	20	12	31	R	AN	Student's first name	
D	Middle Initial	1	32	32	0	AN	Student's middle initial	
E	Last Name	20	33	52	R	AN	Student's last name	
F	Name Suffix	5	53	57	0	AN	e.g., III, JR, SR, etc. Space fill, if not applicable.	
G	Previous SSN	9	58	66	0	N	If SSN changed, enter student's previous SSN	
Н	Previous Last Name	20	67	86	0	AN	Student's previous last name. Space fill, if not applicable.	
	Enrollment Status	1	87	87	R	A	Code for student's enrollment status • F = Full Time • Q = Three Quarter Time • H = Half Time • L = Less Than Half Time • W = Withdrawn • G = Graduated • A = Approved Leave of Absence • D = Deceased Advanced Registration, valid values are "F," "Q," "H," or "L" only. (see Exhibit III)	Q added 2014
J	Status Start Date	8	88	95	С	N	See Exhibit III	
К	Street Line 1	30	96	125	R	AN	Student's permanent street address *if address is unknown, populate with UK.	
L	Street Line 2	30	126	155	0	AN	Continuation of address (e.g., Apt B)	
M	City	20	156	175	R	A	Permanent city of student's residence *if address is unknown, populate with UK.	
N	State	2	176	177	R	A	Permanent state (enter "FO" if foreign country) *if address is unknown, populate with UK.	

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
0	Zip	9	178	186	С	AN	Permanent zip code (space fill foreign addresses and zip extensions, if not available)	
Ρ	Country	15	187	201	R	AN	Country of residence; (See Exhibit III for accepted two-character country codes) If State is domestic or UK and country is blank, US will automatically be populated.	required
Q	Anticipated Graduation Date	8	202	209	С	N	Date student is scheduled to graduate. Required only for enrollment data and students with F, Q, H, L or A statuses; otherwise, space fill.	
R	Date of Birth	8	210	217	R	N	Date student was born entered as YYYYMMDD. If unknown, space fill.	
S	Term Begin Date	8	218	225	R	N	Start date of current academic term (1st day of classes) for program in which student is enrolled	
Т	Term End Date	8	226	233	R	N	End date of current academic term (last day of exams) for program in which student is enrolled	
U	Filler	1	234	234	R	AN	Space fill	
V	Directory Block Indicator	1	235	235	R	A	 Y = Student requested a block on the release of his/her name and/or attendance dates. N = Student did not request a block. 	1999
W	NCES CIP Code for Major 1	6	236	241	0	N	Appropriate NCES CIP code for major, if available. Do not enter decimal points ("."). Space fill, if not applicable. (See also Exhibit III.)	2007
Х	NCES CIP Code for Major 2	6	242	247	0	N	Appropriate NCES CIP code for major, if available. Do not enter decimal points ("."). Space fill, if not applicable.	2007
Y	Major Course of Study 1	80	248	327	0	AN	e.g., History. Fill with "NOT APPLICABLE," if appropriate. (See also Exhibit III.)	2007
Z	Major Course of Study 2	80	328	407	0	AN	e.g., Political Science. Space fill, if not applicable.	2007
AA	Class/ Credential	1	408	408	С	A	STUDENT LEVEL Class or Credential <u>Class</u> • F = Freshman • S = Sophomore	2007

for Excel	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
Format							 J = Junior R = Senior Credential C = Certificate A = Associate's B = Bachelor's N = Unspecified T = Post Baccalaureate certificate M = Master's D = Doctoral P = Post doctorate L = Professional G = Unspecified 	
AB	First Time Full Time	1	409	409	0	A	 First-time, full-time degree/certificate-seeking undergraduate flag. (See Exhibit III.) Y = First-time undergraduate student enrolled full-time who is seeking a degree/certificate N = Student attended full-time before is enrolled only part-time, or is not seeking a degree/certificate If no value, space fill. 	2007
AC	Degree Seeking	1	410	410	0	A	 Y = Student is seeking a degree N = Student is not seeking a degree If no value, space fill. 	2007
AD	High School Code	6	411	416	0	N	CEEB/ACT Code, 000001 thru 999999; otherwise, space fill. (See Exhibit III.)	2007
AE	Gender	1	417	417	0	A	 M = Male F = Female If no value, space fill. (see Exhibit III) 	2007
AF	Race/ Ethnicity	2	418	419	0	A	See Exhibit III. If no value, space fill.	2007

Column	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year
for Excel Format								Added
AG	College Student ID	20	420	439	0	AN	Institutionally supplied student ID number. If no value, space fill. Do not include special characters in this field (e.g., @, #, *, etc.).	2007
АН	State Student ID	30	440	469	0	AN	State-supplied student ID number. If no value, space fill.	2007
AI	Email	128	470	597	0	AN	Student's email address. If no value, space fill.	2007
AJ	Good Student	1	598	598	0	A	Good Student Discount eligibility flag (see Exhibit III). • Y = Eligible • N = Not eligible If no value, space fill. (see Exhibit III)	2007
AK	Middle Name	35	599	633	0	AN	Student's middle name. If no value, space fill.	2007
AL	Veteran's Status Indicator	1	634	634	0	A	 V=Veteran receiving benefits N=Veteran does not receive benefits D=Dependent receiving benefits If no value, space fill. (see Exhibit III) 	2014
AM	Filler	12	635	646	0	AN	Space Fill	
AN	Pell Grant Recipient Flag	1	647	647	0	A	Is student receiving a Pell Grant? (see Exhibit III) • Y = Yes • N = No If no value, space fill. (see Exhibit III)	2014
AO	Remedial Flag	1	648	648	0	A	Is student in at least one remedial course? (see Exhibit III) • Y = Yes • N = No If no value, space fill. (see Exhibit III)	2014
AP	Citizenship Flag	1	649	649	0	A	Is student a US Citizen? Y = Yes N = No If no value, space fill. (see Exhibit III) 	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
AQ	Student Phone Type	1	650	650	0	A	Type of phone number reported: • C = Cell • H = Home • O = Other • W = Work If no value, space fill.	2014
AR	Preferred Phone Number Flag	1	651	651	0	A	Is this the student's preferred phone number: • Y = Yes • N = No Space defaults to Y	2014
AS	Student Phone Country Code	3	652	654	0	N	Country code for student phone number If no value, space fill.	2014
AT	Student Phone Number	11	655	665	0	N	Student's phone number If no value, space fill.	2014
AU	Move To OPE I D	8	666	673	0	N	Eight-digit school code for location to which student enrollment is being moved. If no value, space fill.	2014
AV	Program Indicator	1	674	674	R	A	Is student enrolled in at least one program • Y = Yes • N = No	2014
AW	Program 1 CIP Code	6	675	680	С	N	Six-digit Classification of Instructional Program code identifying a program's academic content. Do not enter decimal points ("."). Space fill if Program Indicator is "N".	2014
AX	CIP Year	4	681	684	С	N	Year in which the CIP used by NSLDS was published. The CIP Year for the codes currently used by NSLDS is 2020. Format CCYY Space fill if Program Indicator is "N". *If CCYY value other than 2020 is present, Clearinghouse edit will automatically default to 2020.	2014
AY	Program 1 Credential Level	2	685	686	С	N	 The credential level of the PROGRAM. (see Exhibit III) Values are: 01 = Undergraduate Certificate or Diploma Program 02 = Associate Degree 03 = Bachelor's Degree 04 = Post Baccalaureate Certificate 	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
							 05 = Master's Degree 06 = Doctoral Degree 07 = First Professional Degree 08 = Graduate / Professional Certificate 99 = Non-Credential Program (Preparatory Coursework / Teacher Certification) Space fill if Program Indicator is "N". 	
AZ	Published Program 1 Length	6	687	692	С	N	Length of the instructional program in years, months, or weeks as published by the school. Format "nnnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – ten (10) • 100000 – one hundred (100) Space fill if Program Indicator is "N".	2014
BA	Published Program 1 Length Measurement	1	693	693	С	A	 Y = Year M = Month W = Week Space fill if Program Indicator is "N". 	2014
BB	Weeks Program 1 Title IV Academic Year	6	694	699	C		Total number of weeks of instruction in the program's academic year. Only report when Published Program Length Measurement is W or M. Format "nnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – one (1) • 100000 – ten (10) • 100000 – one hundred (100) Space fill if Program Indicator is "N" or Published Program 1 Length Measurement is "Y".	2014
BC	Program 1 Begin Date	8	700	707	С	N	Date on which student began attending the program. Format CCYYMMDD Space fill if Program Indicator is "N".	2014
BD	Special Program Indicator	1	708	708	C	A	 Flag to indicate that the program belongs to one of the following groups: A = Special Admission Associate Degree Program B = Bachelor's Degree Completion Program N = Not applicable P = Preparatory Coursework Graduate/Professional 	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
							 T = Non-Credential Teacher Certification U = Preparatory Coursework Undergraduate Space fill if Program Indicator is "N". 	
BE	Program 1 Enrollment Status	1	709	709	C	A	Code for student's enrollment status in this program: • F = Full Time • Q = Three Quarter Time • H = Half Time • L = Less than Half Time • A = Leave of Absence • G = Graduated • W = Withdrawn • D = Deceased • X = Never enrolled Space fill if Program Indicator is "N".	2016 X Status to be added Fall 2016
BF	Program 1 Enrollment Status Effective Date	8	710	717	С	N	Effective date for the program enrollment status currently being reported. Format CCYYMMDD Space fill if Program Indicator is "N". *If X status is used, date should be equal to the Program Begin Date	2014
BG	Program 2 CIP Code	6	718	723	0	N	Six-digit Classification of Instructional Program code identifying a program's academic content. Do not enter decimal points ("."). Space fill if not applicable.	2014
BH	CIP Year	4	724	727	С		Year in which the CIP used by NSLDS was published. The CIP Year for the codes currently used by NSLDS is 2020. Format CCYY Required if Program 2 CIP Code is populated, otherwise space fill. *If CCYY value other than 2020 is present, Clearinghouse edit will automatically default to 2020.	2014
BI	Program 2 Credential Level	2	728	729	С	Ν	 The credential level of the program. (see Exhibit III) Values are: 01 = Undergraduate Certificate or Diploma Program 02 = Associate Degree 03 = Bachelor's Degree 04 = Post Baccalaureate Certificate 05 = Master's Degree 06 = Doctoral Degree 	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
							 07 = First Professional Degree 08 = Graduate / Professional Certificate 99 = Non-Credential Program (Preparatory Coursework / Teacher Certification Required if Program 2 CIP Code is populated, otherwise space fill. 	
BJ	Published Program 2 Length	6	730	735	C	N	Length of the instructional program in years, months, or weeks as published by the school. Format "nnnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – ten (10) • 100000 – one hundred (100) Required if Program 2 CIP Code is populated, otherwise space fill.	2014
ВК	Published Program 2 Length Measurement	1	736	736	С	A	 Y = Year M = Month W = Week Required if Program 2 CIP Code is populated, otherwise space fill. 	2014
BL	Weeks Program 2 Title IV Academic Year	6	737	742	C		Total number of weeks of instruction in the program's academic year. Only report when Published Program Length Measurement is W or M. Format "nnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – ten (10) • 100000 – ten (10) • 100000 – one hundred (100) Required if Program 2 CIP Code is populated. If not applicable or Program Length Measurement is Y, space fill.	2014
BM	Program 2 Begin Date	8	743	750	С	N	Date on which student began attending the program. Format CCYYMMDD Required if Program 2 CIP Code is populated, otherwise space fill.	2014
BN	Special Program Indicator	1	751	751	C	A	 Flag to indicate that the program belongs to one of the following groups: A = Special Admission Associate Degree Program B = Bachelor's Degree Completion Program N = Not applicable 	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
							 P = Preparatory Coursework Graduate/Professional T = Non-Credential Teacher Certification U = Preparatory Coursework Undergraduate Required if Program 2 CIP Code is populated, otherwise space fill. 	
BO	Program 2 Enrollment Status	1	752	752	С	A	Code for student's enrollment status in this program: • F = Full Time • Q = Three Quarter Time • H = Half Time • L = Less than Half Time • A = Leave of Absence • G = Graduated • W = Withdrawn • D = Deceased • X = Never Enrolled Required if Program 2 CIP Code is populated, otherwise space fill.	2016 X Status to be added Fall 2016
BP	Program 2 Enrollment Status Effective Date	8	753	760	С	Ν	Effective date for the program enrollment status currently being reported. Format CCYYMMDD Required if Program 2 CIP Code is populated, otherwise space fill. *If X status is used, date should be equal to the Program Begin Date	2014
BQ	Program 3 CIP Code	6	761	766	0	N	Six-digit Classification of Instructional Program code identifying a program's academic content. Do not enter decimal points ("."). Space fill, if not applicable.	2014
BR	CIP Year	4	767	770	C	N	Year in which the CIP used by NSLDS was published. The CIP Year for the codes currently used by NSLDS is 2020. Format CCYY Required if Program 3 CIP Code is populated, otherwise space fill. *If CCYY value other than 2020 is present, Clearinghouse edit will automatically default to 2020.	2014
BS	Program 3 Credential Level	2	771	772	С	N	 The credential level of the program. (see Exhibit III) Values are: 01 = Undergraduate Certificate or Diploma Program 02 = Associate Degree 03 = Bachelor's Degree 	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
							 04 = Post Baccalaureate Certificate 05 = Master's Degree 06 = Doctoral Degree 07 = First Professional Degree 08 = Graduate / Professional Certificate 99 = Non-Credential Program (Preparatory Coursework / Teacher Certification Required if Program 3 CIP Code is populated, otherwise space fill. 	
ВТ	Published Program 3 Length	6	773	778	C	N	Length of the instructional program in years, months, or weeks as published by the school. Format "nnnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – ten (10) • 100000 – one hundred (100) Required if Program 3 CIP Code is populated, otherwise space fill.	2014
BU	Published Program 3 Length Measurement	1	779	779	С	A	 Y = Year M = Month W = Week Required if Program 3 CIP Code is populated. If not applicable or Program Length Measurement is Y, space fill. 	2014
BV	Weeks Program 3 Title IV Academic Year	6	780	785	С	N	Total number of weeks of instruction in the program's academic year. Only report when Published Program Length Measurement is W or M. Format "nnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – one (1) • 100000 – ten (10) • 100000 – one hundred (100) Required if Program 3 CIP Code is populated, otherwise space fill.	2014
BW	Program 3 Begin Date	8	786	793	С	N	Date on which student began attending the program. Format CCYYMMDD Required if Program 3 CIP Code is populated, otherwise space fill.	2014
BX	Special Program Indicator	1	794	794	С	A	 Flag to indicate that the program belongs to one of the following groups: A = Special Admission Associate Degree Program 	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
							 B = Bachelor's Degree Completion Program N = Not applicable P = Preparatory Coursework Graduate/Professional T = Non-Credential Teacher Certification U = Preparatory Coursework Undergraduate Required if Program 3 CIP Code is populated, otherwise space fill. 	
ВҮ	Program 3 Enrollment Status	1	795	795	C	A	Code for student's enrollment status in this program: • F = Full Time • Q = Three Quarter Time • H = Half Time • L = Less than Half Time • A = Leave of Absence • G = Graduated • W = Withdrawn • D = Deceased • X = Never Enrolled Required if Program 3 CIP Code is populated, otherwise space fill.	2016 X Status to be added Fall 2016
BZ	Program 3 Enrollment Status Effective Date	8	796	803	C	N	Effective date for the program enrollment status currently being reported. Format CCYYMMDD Required if Program 3 CIP Code is populated, otherwise space fill. *If X status is used, date should be equal to the Program Begin Date	2014
CA	Program 4 CIP Code	6	804	809	0	N	Six-digit Classification of Instructional Program code identifying a program's academic content. Do not enter decimal points ("."). Space fill if not applicable.	2014
СВ	CIP Year	4	810	813	С		Year in which the CIP used by NSLDS was published. The CIP Year for the codes currently used by NSLDS is 2020. Format CCYY Required if Program 4 CIP Code is populated, otherwise space fill. *If CCYY value other than 2010 is present, Clearinghouse edit will automatically default to 2020.	2014
СС	Program 4 Credential Level	2	814	815	С	N	The credential level of the program. (see Exhibit III) Values are:	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
							 01 = Undergraduate Certificate or Diploma Program 02 = Associate Degree 03 = Bachelor's Degree 04 = Post Baccalaureate Certificate 05 = Master's Degree 06 = Doctoral Degree 07 = First Professional Degree 08 = Graduate / Professional Certificate 99 = Non-Credential Program (Preparatory Coursework / Teacher Certification) Required if Program 4 CIP Code is populated, otherwise space fill. 	
CD	Published Program 4 Length	6	816	821	С	N	Length of the instructional program in years, months, or weeks as published by the school. Format "nnnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – ten (10) • 100000 – one hundred (100) Required if Program 4 CIP Code is populated, otherwise space fill.	2014
CE	Published Program 4 Length Measurement	1	822	822	С	A	 Y = Year M = Month W = Week Required if Program 4 CIP Code is populated. If not applicable or Program Length Measurement is Y, space fill. 	2014
CF	Weeks Program 4 Title IV Academic Year	6	823	828	C	N	Total number of weeks of instruction in the program's academic year. Only report when Published Program Length Measurement is W or M. Format "nnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – one (1) • 100000 – ten (10) • 100000 – one hundred (100) Required if Program 4 CIP Code is populated, otherwise space fill.	2014
CG	Program 4 Begin Date	8	829	836	С	N	Date on which student began attending the program. Format CCYYMMDD Required if Program 4 CIP Code is populated, otherwise space fill.	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
СН	Special Program Indicator	1	837	837	С	A	 Flag to indicate that the program belongs to one of the following groups: A = Special Admission Associate Degree Program B = Bachelor's Degree Completion Program N = Not applicable P = Preparatory Coursework Graduate/Professional T = Non-Credential Teacher Certification U = Preparatory Coursework Undergraduate Required if Program 4 CIP Code is populated, otherwise space fill. 	2014
СІ	Program 4 Enrollment Status	1	838	838	C	A	Code for student's enrollment status in this program: • F = Full Time • Q = Three Quarter Time • H = Half Time • L = Less than Half Time • A = Leave of Absence • G = Graduated • W = Withdrawn • D = Deceased • X = Never Enrolled Required if Program 4 CIP Code is populated, otherwise space fill.	2016 X Status to be added Fall 2016
Cl	Program 4 Enrollment Status Effective Date	8	839	846	С	N	Effective date for the program enrollment status currently being reported. Format CCYYMMDD Required if Program 4 CIP Code is populated, otherwise space fill. *If X status is used, date should be equal to the Program Begin Date	2014
СК	Program 5 CIP Code	6	847	852	0	N	Six-digit Classification of Instructional Program code identifying a program's academic content. Do not enter decimal points ("."). Space fill, if not applicable.	2014
CL	CIP Year	4	853	856	С	N	Year in which the CIP used by NSLDS was published. The CIP Year for the codes currently used by NSLDS is 2020. Format CCYY Required if Program 5 CIP Code is populated, otherwise space fill. *If CCYY value other than 2020 is present, Clearinghouse edit will automatically default to 2020.	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
СМ	Program 5 Credential Level	2	857	858	C	Ν	 The credential level of the program. (see Exhibit III) Values are: 01 = Undergraduate Certificate or Diploma Program 02 = Associate Degree 03 = Bachelor's Degree 04 = Post Baccalaureate Certificate 05 = Master's Degree 06 = Doctoral Degree 07 = First Professional Degree 08 = Graduate / Professional Certificate 99 = Non-Credential Program (Preparatory Coursework / Teacher Certification Required if Program 5 CIP Code is populated, otherwise space fill. 	2014
CN	Published Program 5 Length	6	859	864	С	N	Length of the instructional program in years, months, or weeks as published by the school. Format "nnnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – ten (10) • 100000 – one hundred (100) Required if Program 5 CIP Code is populated, otherwise space fill.	2014
СО	Published Program 5 Length Measurement	1	865	865	С	A	 Y = Year M = Month W = Week Required if Program 5 CIP Code is populated. If not applicable or Program Length Measurement is Y, space fill. 	2014
СР	Weeks Program 5 Title IV Academic Year	6	866	871	С	Ν	Total number of weeks of instruction in the program's academic year. Only report when Published Program Length Measurement is W or M. Format "nnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – one (1) • 100000 – ten (10) • 100000 – one hundred (100) Required if Program 5 CIP Code is populated, otherwise space fill.	2014
CQ	Program 5 Begin Date	8	872	879	С	N	Date on which student began attending the program.	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
							Format CCYYMMDD Required if Program 5 CIP Code is populated, otherwise space fill.	
CR	Special Program Indicator	1	880	880	С	A	 Flag to indicate that the program belongs to one of the following groups: A = Special Admission Associate Degree Program B = Bachelor's Degree Completion Program N = Not applicable P = Preparatory Coursework Graduate/Professional T = Non-Credential Teacher Certification U = Preparatory Coursework Undergraduate Required if Program 5 CIP Code is populated, otherwise space fill. 	2014
CS	Program 5 Enrollment Status	1	881	881	С	A	Code for student's enrollment status in this program: • F = Full Time • Q = Three Quarter Time • H = Half Time • L = Less than Half Time • A = Leave of Absence • G = Graduated • W = Withdrawn • D = Deceased • X = Never Enrolled Required if Program 5 CIP Code is populated, otherwise space fill.	2016 X Status to be added Fall 2016
СТ	Program 5 Enrollment Status Effective Date	8	882	889	C	N	Effective date for the program enrollment status currently being reported. Format CCYYMMDD Required if Program 5 CIP Code is populated, otherwise space fill. *If X status is used, date should be equal to the Program Begin Date	2014
CU	Program 6 CIP Code	6	890	895	0	N	Six-digit Classification of Instructional Program code identifying a program's academic content. Do not enter decimal points ("."). Space fill, if not applicable.	2014
CV	CIP Year	4	896	899	С	N	Year in which the CIP used by NSLDS was published. The CIP Year for the codes currently used by NSLDS is 2020. Format CCYY Required if Program 6 CIP Code is populated, otherwise space fill.	2014

Column for Excel Format	Field Name	Length	Start	Stop	Req'd	Туре	Comments	Year Added
							*If CCYY value other than 2020 is present, Clearinghouse edit will automatically default to 2020.	
cw	Program 6 Credential Level	2	900	901	C	Ν	 The credential level of the program. (see Exhibit III) Values are: 01 = Undergraduate Certificate or Diploma Program 02 = Associate Degree 03 = Bachelor's Degree 04 = Post Baccalaureate Certificate 05 = Master's Degree 06 = Doctoral Degree 07 = First Professional Degree 08 = Graduate / Professional Certificate 99 = Non-Credential Program (Preparatory Coursework / Teacher Certification Required if Program 6 CIP Code is populated, otherwise space fill. 	2014
сх	Published Program 6 Length	6	902	907	C	Ν	Length of the instructional program in years, months, or weeks as published by the school. Format "nnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – ten (10) • 100000 – one hundred (100) Required if Program 6 CIP Code is populated, otherwise space fill.	2014
CY	Published Program 6 Length Measurement	1	908	908	С	A	 Y = Year M = Month W = Week Required if Program 6 CIP Code is populated. If not applicable or Program Length Measurement is Y, space fill. 	2014
CZ	Weeks Program 6 Title IV Academic Year	6	909	914	C	N	Total number of weeks of instruction in the program's academic year. Only report when Published Program Length Measurement is W or M. Format "nnnnn," with implied decimal b/n third and fourth digits. • 000100 – one tenth (1/10) • 001000 – one (1) • 010000 – ten (10) • 100000- one hundred (100)	2014