



## United States Department of Education

Office of the Secretary

FOIA Service Center

December 27, 2024

Jeremy Singer-Vine  
The Data Liberation Project  
jsvine@gmail.com

RE: FOIA Request No. 22-03723-F

Dear Jeremy Singer-Vine:

This letter is a final response to your request for information pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, dated September 23, 2022, and received in the U.S. Department of Education's (Department) FOIA Service Center (FSC) on September 26, 2022.

You requested the following:

“ 1) All records documenting the National Student Loan Data System (NSLDS), Enterprise Data Management and Analytics Platform Services (EDMAPS), Common Origination and Disbursement (COD), Common Services for Borrowers (CSB) database systems. Federal Student Aid, an office of the Department of Education, recently published in the Federal Register notices relating to the following four systems of records:

- National Student Loan Data System (NSLDS),
- Common Origination and Disbursement (COD) System,
- Common Services for Borrowers (CSB),
- Enterprise Data Management and Analytics Platform Services (EDMAPS).

I request all records that document these systems, including (but not limited to) record layouts, database schemas, entity relationship diagrams, database diagrams, data dictionaries, glossaries, and user guides. ...

I request all such records produced or in use between January 1, 2000, and the date that the search for such records is conducted.”

On October 6, 2022, you updated your request to the following:

"I would like the department to proceed by providing all relevant records, whether related to the legacy or Next Gen NSLDS, as I think it's important to understand both systems. To the extent that any of the expected Next Gen NSLDS documents have not yet been created (my interpretation of the phrase "there will be new documents") I would prefer to file a follow-up request for those documents rather than wait for the creation."

Your request was forwarded to Office of the Chief Information Officer, Institute of Education Sciences and Federal Student Aid (FSA).

The Department has identified 2,327 pages, responsive to Items 1 and 2 of your request, that are being released to you in part. Portions not released are being withheld pursuant to the Freedom of Information Act, 5 U.S.C. § 552(b). The applicable Exemption is as follows:

(b)(4)

An additional enclosure with this letter explains these exemptions in more detail.

FSA also provide the following as response to your request:

1. **National Student Loan Data System (NSLDS) -**

[NSLDS User Resources | Library | Knowledge Center](#)

<https://www.federalregister.gov/documents/2023/06/28/2023-13697/privacy-act-of-1974-system-of-records>

2. **Common Origination and Disbursement (COD) System** – The COD Technical Reference and system documentation is posted in the Knowledge Center of our FSA site: Partner Connect. This site was designed for individuals involved in the administration of the Title IV financial aid for postsecondary education.

<https://www.federalregister.gov/documents/2023/06/28/2023-13698/privacy-act-of-1974-system-of-records>

[COD System | Knowledge Center](#)

[2022–2023 COD Technical Reference \(Final\) \(June 2022 Update\) | Knowledge Center](#)  
[COD XML Schema | Library | Knowledge Center](#)

3. **Common Services for Borrowers (CSB) - Common Services for Borrowers (CSB)** SORN covers DMCS and multiple Federal Loan Servicers (including Not-For-Profit (NFP)) and Private Collection Agencies (PCAs). The SORN is publicly available at

<https://www.federalregister.gov/documents/2022/09/13/2022-19887/privacy-act-of-1974-system-of-records>

4. **Enterprise Data Management and Analytics Platform Services (EDMAPS) – Enterprise Architecture Program - Enterprise Logical Data Model (ed.gov)**

<https://www.federalregister.gov/documents/2022/09/13/2022-19886/privacy-act-of-1974-system-of-records>

The Department has thoroughly considered whether disclosure of the record(s) (or portions thereof) is prohibited by law and, if not, whether the exempt material would, in fact, pose a foreseeable harm to an interest protected by an exemption from disclosure under the FOIA if released. After conducting a foreseeable harm analysis, the Department has concluded that the material, if released, would harm an interest protected by the exemption(s) identified in the Applicable Exemption list.

The pages are available for download via the Public Access Link (PAL). You can access your PAL account, or register for a PAL account, at this link:

<https://foiexpress.pal.ed.gov/app/PalLogin.aspx>

### Fees

There are no fees associated with processing this request. Therefore, any fee waiver request submitted for this FOIA request is not applicable.

### Additional Assistance

You have the right to seek assistance and/or dispute resolution services from the Department's FOIA Public Liaison or the Office of Government Information Services (OGIS). The FOIA Public Liaison is responsible, among other duties, for assisting in the resolution of FOIA disputes. OGIS, which is outside the Department, offers ombuds services, including dispute resolution, to assist FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Please note, OGIS's assistance does not replace the administrative appeal process described below. You may contact the FOIA Public Liaison or OGIS at:

FOIA Public Liaison  
Office of the Secretary  
U.S. Department of Education  
400 Maryland Ave., SW, LBJ 7W104  
Washington, DC 20202-4500  
Email: [robert.wehausen@ed.gov](mailto:robert.wehausen@ed.gov)  
Phone: 202-205-0733  
Fax: 202-401-0920

Office of Government Information Services  
National Archives and Records Administration  
8601 Adelphi Road, OGIS  
College Park, MD 20740-6001  
Email: [OGIS@nara.gov](mailto:OGIS@nara.gov)  
Phone: 202-741-5770 or 1-877-684-6448

You have the right to appeal this decision, as well as decisions in any previous interim

releases, with the Department by submitting an appeal to the address below, no later than 90 calendar days from the date of this letter. Using the FOIA Public Liaison or OGIS services described above does not affect your right or the deadline to file an appeal. Your appeal must be in writing and must include a detailed statement of all legal and factual bases for the appeal. It should be accompanied by this letter, a copy of your initial letter of request, and any documentation that supports the argument you wish the Department to consider in making an administrative determination on your appeal. You may submit your appeal by:

Mail: Appeals Office  
Office of the Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW, LBJ 7W104  
Washington, DC 20202-4536

Online Form: [www.ed.gov/policy/gen/leg/foia/foia-appeal-form.pdf](http://www.ed.gov/policy/gen/leg/foia/foia-appeal-form.pdf)

Email: [EDFOIAappeals@ed.gov](mailto:EDFOIAappeals@ed.gov)

Fax: 202-401-0920

Sincerely,

*Sandra Lewandowski*  
Government Information Specialist  
Office of the Secretary

SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552

**Exemption (b)(1):** Records or portions of records that contain information that is properly classified for national security purposes.

**Exemption (b)(2):** Records or portions of records that are related solely to an agency's internal personnel rules and/or practices.

**Exemption (b)(3):** Records or portions of records that are specifically exempted from disclosure by statute.

**Exemption (b)(4):** Records or portions of records that contain trade secrets and commercial or financial information obtained from a person that is privileged or confidential.

**Exemption (b)(5):** Records or portions of records that contain inter- or intra-agency records that are normally privileged in the civil discovery context.

**Exemption (b)(6):** Records or portions of records relating to personnel and medical files and similar files when disclosure would constitute a clearly unwarranted invasion of personal privacy.

**Exemption (b)(7)(A):** Records or portions of records compiled for law enforcement purposes, where the release of those records could reasonably be expected to interfere with enforcement proceedings.

**Exemption (b)(7)(B):** Records or portions of records compiled for law enforcement purposes, where the release of those records would deprive a person of the right to a fair trial or an impartial adjudication.

**Exemption (b)(7)(C):** Records or portions of records compiled for a law enforcement purpose where the release of those records could reasonably be expected to constitute an unwarranted invasion of personal privacy.

**Exemption (b)(7)(D):** Records or portions of records compiled for a law enforcement purpose where the release of those records could reasonably be expected to disclose the identity of a confidential source or information furnished by such source.

**Exemption (b)(7)(E):** Records or portions of records compiled for law enforcement purposes, where the release of those records would disclose techniques and procedures for law enforcement investigations or prosecutions, or guidelines for investigations or prosecutions if disclosure could reasonably be expected to risk circumvention of the law.

**Exemption (b)(7)(F):** Records or portions of records compiled for law enforcement purposes, where the release of those records could reasonably be expected to endanger the life or personal safety of an individual.

**Exemption (b)(8):** Records or portions of records that are contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions.

**Exemption (b)(9):** Records or portions of records that are related to geological and geophysical information and data, including maps, concerning wells.