

**Attention: Information No Longer Current
(Alert archived November 2011)**

Alert #14 – Update 3

Title: Final U.S. Department of Education Guidance on Collecting, Maintaining and Reporting Data on Race and Ethnicity

Prepared: October 2007

Note: This topic will have broad implications for institutions. AIR's Higher Education Data Policy Committee recommends that you widely share copies of this Alert with executive level administrators and individuals at your institution who are responsible for information technology, admissions, student records, financial aid, human resources, affirmative action, institutional research, and any other area that may be affected.

Summary

The U.S. Department of Education (ED) has issued final guidelines for how institutions will collect and maintain race and ethnicity data for students and employees, and how those data will be aggregated for reporting to the Integrated Postsecondary Education Data System (IPEDS). (The final guidance was published on October 19, 2007, in a Federal Register notice available at <http://a257.g.akamaitech.net/7/257/2422/01jan2007/800/edocket.access.gpo.gov/2007/pdf/E7-20613.pdf>.)

Institutions will be **required** to 1) use a two-question format when collecting race/ethnic data, 2) allow students and employees to select one or more of five races, 3) maintain detailed information on student and employee responses for at least three years (or until completion of any legal action involving these records), 4) collect data from students and employees who enter the institution from fall 2010 and later using the two-question format, and 5) begin IPEDS reporting using the new race/ethnicity categories for Fall Enrollment and Human Resources in the 2010-2011 collection year and all relevant components in the 2011-2012 collection year.

Institutions are **encouraged** to allow current students and employees to re-identify their race/ethnicity using the new standards, and to begin IPEDS reporting using the new race/ethnicity categories for all relevant components in the 2008-2009 collection year.

Institutions must implement the requirements by the fall of 2010 to report data for the 2010-2011 school year. To comply with the final guidelines, institutions may have to revise their admissions, employment and registration forms, change data storage and retrieval software, and modify reports and analyses.

Current Status

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The final guidance includes requirements for how institutions will collect and maintain race, and ethnicity data and how institutions will report aggregate data to IPEDS, and actions that institutions are "encouraged" to take.

Collection of Data: By the fall of 2010, institutions will be required to collect data from students and employees using a two-question format.

The **first question** asks whether the respondent is Hispanic or Latino or is Not Hispanic or Latino. The term "Spanish origin" may be used in addition to "Hispanic or Latino." The term Hispanic or Latino is defined as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race. The **second question** asks the respondent to select **one or more races** from the following five racial groups:

- American Indian or Alaska Native: A person having origins in any of the original peoples of North and South America (including Central America), and who maintains a tribal affiliation or community attachment.
- Asian: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American: A person having origins in any of the black racial groups of Africa.
- Native Hawaiian or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- White: A person having origins in any of the original peoples of Europe, the Middle East or North Africa.

Note: Institutions may collect additional information regarding sub-categories within these categories, such as specific Asian groups, tribal affiliation, or Latino origin, as long as they may be summed into the approved federal classification categories. Institutions must not use a multi-race category in collecting the data from individuals.

The notice states that institutions should include instructions that encourage individuals to answer both the ethnicity question and the race question. Institutions should ensure that a respondent who does not provide race/ethnicity information is refusing to self-identify rather than simply overlooking the questions. According to the final guidance, if the institution has provided adequate opportunity for the respondent to self-identify, and he or she still leaves the items blank or refuses to complete them, observer identification is **not required** by postsecondary education institutions.

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In a subsequent document, the ED will provide instructions that institutions may include on their data collection forms. These instructions will be designed to eliminate confusion and to encourage individuals to answer both questions.

The notice states that institutions are encouraged, **but not required**, to resurvey students and employees who identified their race/ethnicity using the earlier standards. The ED "expects" that most institutions will provide the opportunity for individuals to re-identify themselves under the new standards. Institutions are encouraged to inform individuals about how the aggregate data are reported in IPEDS.

Retention of Data: Institutions are required to keep the detailed information on student and employee responses for at least three years (or, if needed for litigation, a claim or an audit, until the completion of the action), including racial identification for individuals choosing Hispanic/Latino and multiple race responses. This information may be requested for an Office for Civil Rights (OCR) investigation or compliance review or other legal action.

IPEDS Reporting: Beginning in the 2010-2011 collection year, institutions must report IPEDS Fall Enrollment and Human Resources aggregate race and ethnicity data using nine categories:

1. Hispanics of any race

For Non-Hispanic/Latino Individuals only:

2. American Indian or Alaska Native
3. Asian
4. Black or African American
5. Native Hawaiian or Other Pacific Islander
6. White
7. Two or more races

Plus

8. Race and ethnicity unknown
9. Non-Resident Alien (of any race or ethnicity)

Beginning in the 2011-2012 collection year, institutions will be required to use the new IPEDS racial/ethnic categories for all relevant components (Fall Enrollment, Human Resources, Completions, 12-Month Enrollment, and Graduation Rates).

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The notice states that institutions that are already collecting data in the manner specified in the final guidance are encouraged, **but not required**, to "immediately" begin reporting aggregate data to ED in accordance with the guidance. The new racial/ethnic reporting standards will be available for **optional** IPEDS reporting for all relevant components beginning in the 2008-2009 collection year. (See http://nces.ed.gov/IPEDS/news_room/ana_Changes_to_10_25_2007_169.asp for more information on how the NCES will phase in the new IPEDS reporting requirements.)

Bridging Data to Prior Years' Data: The notice discusses alternative bridging methods for linking the new data to data collected under prior requirements. It indicates that further guidance on bridging the data collected before and after these changes take effect can be found in the OMB's December 15, 2000, Provisional Guidance on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity, available at http://www.whitehouse.gov/omb/inforeg/re_app-ctables.pdf. Additional guidance can be found in the OMB's March 9, 2000, Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement available at <http://www.whitehouse.gov/omb/bulletins/b00-02.html>.

Implications for Institutions

The new OMB standards may require institutions to make considerable investments of both time and money. Coordination among a number of offices (e.g., Information Technology, Admissions, Registrar, Financial Aid, Human Resources, Affirmative Action or EEO, and Institutional Research) will be necessary. Institutions that rely on vendor-developed computer systems should begin discussions with their vendors right away. Those who report through a state system need to coordinate their processes and timing with their states. The ED is enforcing full compliance with IPEDS reporting requirements.

Admissions, registration and employment forms (both hardcopy and on-line) may have to be changed to conform to the new standards.

Adopting the new standards will result in new data, and possibly in a different **structure** for institutional databases to support multiple race/ethnic categories for each individual. Such a structure may require considerable programming changes in campus-based systems and state-level systems.

Institutions should keep the "old" field for race/ethnicity, especially for the IPEDS Graduation Rate Survey (GRS) cohorts. The IPEDS GRS presents a particular challenge in implementing the new standards because it tracks entering cohorts of students during a period of up to six years (or

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up to 7.5 years for five-year programs) and is based on the initial fall enrollment racial/ethnic data for each cohort. Students who graduated or withdrew since the initial data were collected cannot be resurveyed.

The computer programs used to generate reports relating to race/ethnicity will need to be modified to accommodate new data structures and the new reporting formats.

The final guidance probably will lead to decreases in institutional IPEDS data in the counts for individual races as individuals are reclassified as Hispanic/Latino or as "two or more races."

The new federal rules for collecting data will increase what many institutions know about the diversity of their community by capturing information on the increasing number of people who identify with more than one race. However, the federal rules for reporting data reduce 64 possible combinations of race/ethnic responses to eight categories - Hispanic/Latino individuals of any race, two or more races, five single-race categories, and Unknown. (Non-resident alien represents the ninth reporting IPEDS category.) Institutions may wish to adopt a different method for internal reporting and for data exchanges.

Institutions may choose to use the "minimum/maximum" approach for some non-IPEDS reporting. For each category, this approach produces a minimal count - the number of individuals who select only one ethnic or racial category, and a maximum count - the number of individuals in a category regardless of other categories they may select. For example, a maximum count of Black/African American students would include those who identified themselves only as Black/African American plus those who identified themselves as Black/African American and also selected Hispanic/Latino and/or one or more other races. The total number resulting from this approach will be greater than the number of individuals in the population. Reports using such a strategy will need to be prepared and explained carefully.

EEO Reporting

The new Department of Education guidelines for reporting race/ethnicity apply to students, faculty and staff. The EEOC collects workforce data by race/ethnicity from universities with hospital employees. Universities that have to complete EEOC reports may need to also consider the EEOC approach to reporting race/ethnicity, especially if information on all faculty/staff is maintained in a shared system. The EEO-1 report, known as the Employer Information Report, was modified in 2007. The report due September 30, 2007, used the revised EEOC race/ethnic categories. The EEOC plans to update their other reports to use the same race and ethnic categories as the new EEO-1 but before doing so, will give respondents a full reporting cycle to change their recordkeeping. For additional information see the Q&A on revised EEO

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race/ethnicity categories (<http://www.eeoc.gov/eeo1/qanda-implementation.html>) and the EEO-1 survey (<http://www.eeoc.gov/employers/surveys.html>).

Timeline

October 30, 1997 - The OMB published final Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity

December 15, 2000 - The OMB issued Provisional Guidelines on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity:

http://www.whitehouse.gov/omb/inforeg/re_guidance2000update.pdf

January 1, 2003 - Original date for new federal data collection and reporting. Not enforced because reporting guidelines were not available.

August 7, 2006 - *Federal Register* notice of Department of Education's Proposed Guidance on Maintaining, Collecting and Reporting Data on Race and Ethnicity

September 21, 2006 - Deadline for submitting to ED comments on proposed guidance

October 19, 2007 - *Federal Register* notice of Department of Education's Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data to the U.S. Department of Education

Fall 2010 - Required implementation of final guidance for 2010-2011 school year

Additional Resources

For further information about the final guidance, contact Patrick J. Sherrill, U.S. Department of Education, 400 Maryland Avenue, SW, Room 6C103, Washington, DC 20202-0600, 202-708-8196, or Edith K. McArthur, U.S. Department of Education, National Center for Education Statistics, 1990 K Street, NW, Room 9115, Washington, DC 20006, 202-502-7393.

Complete information about IPEDS is available at <http://nces.ed.gov/ipeds>. Information about the IPEDS implementation of the final guidance is available at http://nces.ed.gov/IPEDS/news_room/ana_Changes_to_10_25_2007_169.asp.

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The OMB's Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity (*Federal Register*, October 30, 1997, pp. 58781-58790) is available at <http://www.whitehouse.gov/omb/fedreg/1997standards.html>.

Related AIR Alerts

[Alert #6](#), New Federal Standards for Racial and Ethnic Data Collection and Reporting (April 1998).

[Alert #6, Update #1](#), Executive Summary of Proceedings for the Policy Panel on Racial/Ethnic Data Collection, March 17-18, 1998 (April 1998).

[Alert #14](#), Update on Federal Race and Ethnicity Reporting Changes (July 2002).

[Alert #14, Update 1](#), Follow up to Alert #14, Update on Federal Race and Ethnicity Reporting Changes (August 2002).

[Alert #24](#), OMB Reporting Standards for IPEDS Student and Employee Racial and Ethnic Data Will Not Be Implemented in 2004-2005 (August 2004).

[Alert #14, Update 2](#), U.S. Department of Education Issues Proposed Guidance on Collecting, Maintaining, and Reporting Data on Race and Ethnicity (August 2006).

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Coordinated by the Higher Education Data Policy Committee. All opinions expressed herein do not necessarily reflect the official position of the Association for Institutional Research.