

**Attention: Information No Longer Current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

Alert #26 – Update 2

Student Unit Record Reporting Proposed for IPEDS

Prepared: April 2005

Type: Information

Note: If the proposed student unit-record system is implemented, it would have broad implications for all higher-education institutions. The AIR Higher Education Data Policy Committee encourages you and others at your institution who are responsible for admissions, student records, financial aid, student financial records, athletics, general counsel, government relations, information technology, and any other area that is responsible for reporting financial aid and IPEDS student data to read and carefully review the almost 200-page final report from the feasibility study for a proposed Integrated Postsecondary Education Data System (IPEDS) student unit record database, referenced below.

Summary

The National Center for Education Statistics (NCES) sent to Congress the final report from a feasibility study for a proposed Integrated Postsecondary Education Data System (IPEDS) student unit record database: <http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2005160>

See [AIR Alert 26 and Update 1](#) for information about the feasibility study.

The proposed system, which would require institutions to provide data for student-related IPEDS surveys in student unit record format (i.e., in individually identifiable student records) instead of the current institutional summary-level format, would be implemented by NCES only if:

- Congress passes legislation authorizing NCES to do so.
- Congress provides the necessary funds to the Department of Education (ED) in appropriations legislation, and
- Congress makes needed amendments to the Family Educational Privacy Act (FERPA).

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Assuming authorizing legislation were enacted in the summer of 2005, the proposal calls for a pilot study in 2006-07 involving 1,200-1,500 institutions, and full implementation of the new system in 2007-08. Submission of other IPEDS surveys (the three faculty/employee surveys, Finance, and Institutional Characteristics) would continue in the traditional institutional summary-level format.

The feasibility study was conducted in response to interest in Congress and in parts of the higher education community for information that is not provided by the current IPEDS. Information regarding net price, financial aid, transfer rates, time-to-degree, and graduation rates (e.g., graduation rate data for aided versus non-aided students, for part-time students, for students by academic program, and for periods longer than 150 percent of normal time) are among the issues of continuing and growing interest.

The proposed student unit record system is intended to provide the federal government with the ability to do more detailed and consistent analyses on these issues and others that may arise in the future. For example, the student unit record system would allow the computation of new derived variables, including institutional accountability measures (of interest to some in Congress), and information for prospective students and their parents. Because data in the student unit record system could be used to create new analyses and aggregate summary reports about an institution in response to new information demands, it could lessen the need for new aggregate reporting by institutions.

The challenges to the implementation of a student unit record system, including privacy and confidentiality of individual student data, institutional burden, coordination among institutions' offices, technical issues, and timing of the submissions also are addressed in the final feasibility report.

The feasibility report concluded, "At the technical level, a UR system could be done at most institutions given time for implementation, and the problems associated with development of such a system are manageable."

If the student unit record system were to be implemented, the proposed reporting system would have major implications for postsecondary education institutions. AIR plans to conduct an online survey in the next two months to solicit reactions from institutions to the student unit record proposal and feedback about concerns they may have about implementation at their institutions - after the AIR members have had the opportunity to read and digest the almost 200-page report.

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If the proposed IPEDS student unit record system is not authorized and funded by Congress, and if Congress mandates the collection of accountability measures relating to enrollment, completions, price and financial aid, and graduation rates (e.g., graduation rate data for aided versus non-aided students, for part-time students, and for periods longer than 150 percent of normal time) NCES may have to expand current aggregate reporting requirements.

Current Status (Note: information below will probably change because of deliberation by future Technical Review Panels)

What Institutions May be Required to Do

If the proposed system is authorized and funded by Congress, final decisions about the design of the system would be informed by a series of Technical Review Panels (TRPs). The feasibility study provides only a preliminary design and its language should not be construed as a final NCES decision about the future. The current proposal calls for the annual submission of at least three term enrollment student unit record files (records for each student enrolled at any time during the term, to be submitted at the end of each term), at least one completions file (in September), and at least one price and student financial aid file (October 1). Forty variables have been identified that would be collected for each student, including Social Security number (SSN), name, address, demographics, program-related information, enrollment status and dates, price and financial aid data, and completions-related variables (see <http://www.airweb.org/images/alert26update2chart.ppt> for details). Failure to submit IPEDS data carries with it a fine of up to \$27,500.

In the first year, institutions would be required to submit comprehensive "header records" for all students, and historical files for graduation-rate cohorts going back six years for four-year institutions and three years for two-year institutions. The other student IPEDS reports would require enrollment data for current students and completions and financial aid data for the prior-year students.

Because of requirements from the Office of Management and Budget (OMB), all unit record data, including the current files and historical Graduation Rate Survey (GRS) files, must use the two-question format for race/ethnicity reporting mandated by the OMB in 1997 for federal agencies when they collect information from individuals (see [AIR Alert # 6](#), New Federal Standards for Racial and Ethnic Data Collection and Reporting [April 1998]). This format allows individuals to identify themselves as belonging to more than one racial category (White, Black or African American, Asian, American Indian or Alaska Native, and Native Hawaiian or other Pacific Islander) in addition to indicating Hispanic/Latino ethnicity. The new OMB standards also redefine certain categories.

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Institutions selected for the pilot in Fall 2006 would be required to submit student data using student unit record files in addition to the traditional institutional summary-level IPEDS Fall Enrollment, Completions, Student Financial Aid, and Graduation Rate Surveys, and price of attendance. If the new race/ethnic format has not been implemented for aggregate IPEDS reporting, they would be required to submit race/ethnic data in the current (one-question) format for institutional summary-level reports and in the new two-question format for student unit record files. If selected, institutions must participate in the pilot. (The completion of all IPEDS surveys is mandatory for all institutions that participate in or are applicants for participation in Title IV Higher Education Act (HEA) student financial aid programs.)

The tentative design suggests there might be variations across institutions in the number and timing of data submissions, but calls for locking enrollment data three months after the end of each term. Completions data would be locked by the end of November, and student financial aid and price data would be locked by the end of December. The NCES report suggests that future discussions will need to resolve how to deal with mid-term changes in student status (e.g., change from full-time to part-time enrollment, and how to determine enrollment information for the aggregate Fall Enrollment data).

Edit Checks

Keyholders would be required to resolve a series of edit checks both at the student unit record level and at the aggregate level. Edit checks look for internal inconsistencies/errors, potential record-matching problems (e.g., missing prior record), and data-inconsistency edits identified by matching newly submitted records with records on the master student unit record database (both from same and different institutions), differences between current summary reports and prior-year summary reports from the Peer Analysis System (PAS), state coordinator edits (if relevant), National Student Loan Data System (NSLDS) verification inconsistencies, PAS quality control, and full-year transaction edits. The NCES will provide the SQL code prior to data collection so that institutions may run their own edit checks before submitting their data to NCES.

Examples of errors that would need to be resolved by the institutional keyholder include a financial aid or completions record without a corresponding enrollment record, a change in a name or demographic, or the discovery by NCES that a student an institution classified as "first-time" had a prior enrollment record at another postsecondary education institution. Resolution of edit checks requires resubmitting the student unit record file. The NCES estimates 4%-6% of file merges result in mismatches (i.e., around 50 mismatches per 1,000 records, and there could be multiple records per student), and mismatches are only one of the many types of edits that will need to be resolved.

IPEDS Year

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All IPEDS student data would be based on a July 1 to June 30 year, which has several implications. Students in summer terms before July 1 would not be counted in the same IPEDS year (or enrollment file) as those beginning on or after July 1. The TRPs would have to develop guidelines for dealing with students enrolled in courses that span July 1.

The census date for graduation rate calculations also would be changed. Currently, the IPEDS GRS follows students in each cohort through August 31 of the sixth year for four-year institutions, and the third year for two-year institutions. So, late summer graduates are counted as completers in calculating the institution's graduation rate (and because the report isn't due until April of the following year, it in effect allows institutions to include any degrees that are "retroactively posted" into the spring). But, with a cohort year of July 1 to June 30, degrees awarded to students after June 30 in the final year for the cohort, or "retroactively posted," would not be counted in the institution's graduation rate. The degree to which graduation rates would be lowered is expected to vary across institutions.

Privacy, Confidentiality, and Security Issues

The NCES report cites the confidentiality and security provisions under which NCES operates that would provide protection for the student data. However, concerns have been raised about intrusions into student privacy and the possibility that future Congressional actions could allow access to the data by other federal agencies. Other concerns that have been raised include the possibility that, in the future, student unit record data in the NCES system might be used to sanction students. The FERPA would have to be amended to allow for redisclosures of the data, including sending data back to the keyholder to resolve errors and mismatches, using the data for enrollment verification by NSLDS for loan repayment deferrals, and sending a file to institutions and state coordinators with subsequent enrollment and completions data for students who left the prior year (available to the keyholders for a predefined period). It is proposed that students would be given the opportunity to opt-out of the redisclosure to institutions, but not out of the student unit record database, enrollment verification for the NSLDS, or redisclosures permitted under the PATRIOT Act.

Implications for Institutions

- Institutions could have more complete information about subsequent enrollments and completions of their former students.
- Mission-specific data could be developed for dissemination in the PAS.

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- The following is a list of tasks that an institution would need to address in implementing the student unit record system:
 - Consult with IPEDS coordinator, if relevant;
 - Coordinate among relevant institutional offices;
 - Develop (or have vendors develop) computer systems that generate the student unit record files and that do preliminary checking routines (if the institution opts to check before submitting rather than relying on ability to resolve edit checks generated by NCES in the three-month window for submission and locking);
 - Collect race/ethnic data using the two-question format; develop a cross-walk to change codes in old format to new format for students on old GRS files and for current students who don't provide updated data; (This change eventually will be required by the OMB, regardless of whether UR is implemented);
 - Start collecting SSNs if they do not already do so; generate SSNs for historical GRS cohort files;
 - If necessary, modify process for posting degrees so that it is complete by the end of September;

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- Develop a mechanism to notify students of submissions of data to the new federal database, to allow students to opt out of redisclosures to your institution of subsequent enrollment at other institutions, and to create FERPA-required documentation of the transmission of student data to NCES;
- Develop a mechanism to upload files and resolve all edit checks within a three-month period of time;
- Train staff and hire new staff, if needed; and
- Find funds for the added costs of the student unit record system.

Institutions selected for the pilot would have to complete these steps by Fall 2006 (or according to any calendar that is mandated by Congress). Other institutions would have more time to prepare. All institutions would need to monitor the outcomes of the TRPs to be held beginning in Fall 2005.

All institutions would face some incremental costs, both initial and ongoing; the amount would depend on factors such as how much effort is required to change databases and how well integrated they currently are, technical abilities of current staff, e.g., whether they currently submit student unit record data elsewhere, and to support eventual requirement to submit XML files (the office of Federal Student Aid (FSA) will require that all FSA data be transmitted using XML tags beginning in 2005-06).

Opportunity costs would occur from the projects that would not be done because of start-up tasks and ongoing edit checks, and the fact that one student enrollment submission is being replaced by three or more. The IPEDS Institutional Characteristics, the three faculty/staff surveys, and Finance surveys would continue to be collected in institutional summary report format. The current Web-based system would continue to be used, including the coordination structures.

Certain state agencies that currently provide IPEDS student data for institutions may choose to no longer do so, rather than substantially change their data systems. Other states may choose to start coordinating IPEDS data to gain access to the data in the student unit record system.

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In some states, institutions may have to submit student unit record data to a state agency in a different format than required in IPEDS.

Because institutions will not have access to the federal student database, some of the "official" aggregate data produced by NCES may differ from the data produced by the institution (e.g., if the graduation rate cohort were adjusted to remove students who are discovered to have been enrolled elsewhere before attending your institution, or because NCES data had been perturbed). Institutions would have the opportunity to review their current IPEDS summary data, including new derived variables before they are posted to the PAS.

Institutions that have significant numbers of students who complete degrees between June 30 and August 30 would see their graduation rates decline, if the proposed change to the IPEDS year is adopted.

The dissemination of net price data by NCES (on the IPEDS College Opportunities On-Line (COOL) Web site) could lead students to raise questions if the aid they were offered did not match what they expected based on COOL. Currently, NCES collects and posts price and financial aid data for the fall and spring terms for first-time full-time students reported on IPEDS Fall Enrollment the prior year (for term-based institutions). If student unit record data were collected for the entire year, including for students enrolled in summer terms (who typically receive less financial aid), the resulting net price might not reflect what students could expect for fall or spring terms.

Other new derived variables may not accurately reflect the institution because of idiosyncrasies in institutional policies or databases (e.g., those who use number of courses rather than credit hours to determine full-time status, or variations in the enrollment status of study-abroad students).

Timeline

October - November 2004 - Three Technical Review Panels (TRPs) were held in late October and early November 2004 to provide input into the Feasibility Study.

January 2005 - Comments were requested from the TRP participants on a draft report for the Feasibility Study.

March 21, 2005 - The final report of the Feasibility Study was released and sent to Congress.

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AIR will conduct an online survey in the **next two months** to solicit reactions from institutions to the student unit record proposal and feedback about any concerns they might have about implementation at their institutions.

May 31, 2005 - The NCES will provide information about the proposed IPEDS student unit record system during the 2005 AIR Forum in San Diego on May 31, Tuesday, from 3:30 to 5 pm. (See http://www.airweb3.org/air_forum/session.asp?GoSession=534)

Fall 2005 - If the IPEDS student unit record system were to be authorized and funded by Summer 2005, TRPs would be held beginning in fall 2005 to work out details of the new system, and schools would be notified that they would be required to participate in a pilot study in 2006-07.

2006-2007 - The pilot study would be 2006-2007.

2007-2008 - Full implementation would be in 2007-2008 (although the possibility of a phased approach was mentioned in the report).

Additional Resources

[AIR Alert # 26](#) and [AIR Alert # 26 Update 1](#) provided information about the feasibility study.

The final report of the feasibility study is available at <http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2005160>

A list of the 40 variables that have been proposed for student unit record submissions is available at <http://www.airweb.org/images/alert26update2chart.ppt>

Complete information about IPEDS, including the PAS and the COOL Web site is available at <http://nces.ed.gov/ipeds>. (Note: Readers responsible for submitting IPEDS student data should use information available on the IPEDS Web site about the current IPEDS reporting requirements and not rely on the summary information provided in the feasibility study report.)

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

Information about the FERPA is available at: <http://www.ed.gov/policy/gen/guid/fpco/index.html>

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Authors: AIR Higher Education Data Policy Committee

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