

**Attention: Information No Longer Current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

Alert #36

Title: New Disclosure and IPEDS Reporting Requirements in the Higher Education Opportunity Act

Prepared: August 2008

Type: Informational - Immediate Changes Required

Summary

This Alert contains information about selected provisions in the Higher Education Opportunity Act (H.R. 4137) that was signed into law on August 14, 2008. Provisions of particular relevance to institutional researchers include new Integrated Postsecondary Education Data System (IPEDS) reporting; new data that must be disclosed by each institution to current and prospective students; and federal studies to be conducted on employment of postsecondary education graduates, IPEDS, and measures of degree completion.

Note: This Alert is not intended to be a comprehensive summary of the Higher Education Opportunity Act (HEOA) requirements. Other aspects of the bill may also affect some institutional research offices. See the Additional Resources section below for sources of additional information on the bill.

Introduction

On July 28, 2008, the National Center for Education Statistics (NCES) announced changes to the Integrated Postsecondary Education Data System (IPEDS) for the 2008-09 collection year that included:

- (1) Implementation of new race and ethnicity reporting;
 - (2) Changes to Finance collection forms;
 - (3) Elimination of the first-professional degree classification; and
 - (4) Changes to the Student Financial Aid survey.
- (For more information see the notice at http://nces.ed.gov/IPEDS/news_room/twk_Changes_and_7_28_2008_187.asp).

Additional changes to the 2008-09 IPEDS collection will be required for compliance with amendments to the Higher Education Act (HEA) in the Higher Education Opportunity Act (for

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more information see the notice at http://nces.ed.gov/IPEDS/news_room/ana_Changes_to_8_22_2008_188.asp).

Within one year of enactment, the U.S. Department of Education (ED) must publish a list of "Consumer Information" items on the College Navigator website (HEA, Sec. 132(i)). The list includes several items that currently are not collected in the Integrated Postsecondary Education Data System (IPEDS). *This means that new data will need to be collected in the upcoming collection year, in addition to the items previously announced by NCES. The new data required by the HEA will not have an optional reporting year.*

The legislation also adds new requirements to the list of information items that institutions must make available to current and prospective students (HEA, Sec. 485(a)). Specifications for these new disclosure requirements will be determined as part of the rulemaking process that will occur over the next several months (See <http://www.ed.gov/policy/highered/leg/hea08/introduction.html> for more information about the rulemaking process).

Additionally, ED is required to provide an annual Compliance Calendar to assist institutions in complying with all the disclosure and reporting requirements in the HEA (Sec. 482(e)).

Current Status

Additional New IPEDS Reporting Requirements. Many, but not all, of the items on the Consumer Information list currently are collected in IPEDS.

The items on the Consumer Information list not currently reported to IPEDS, nor among the changes previously announced for 2008-09, include:

- (1) The percentage of undergraduate students who are formally registered with the institution's office of disability services;
- (2) The percentage of first-time, full-time, degree- or certificate-seeking undergraduate students who obtain a degree or certificate within--
 - (a) the normal time for completion or graduation,
 - (b) 200 percent of normal time for completion or graduation;
- (3) The student-faculty ratio;
- (4) A link to the institution's website that provides, in an easily accessible manner, the following information--

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- (a) Student activities offered by the institution,
- (b) Services offered by the institution for individuals with disabilities,
- (c) Career and placement services offered by the institution to students during and after enrollment,
- (d) Policies of the institution related to transfer of credit from other institutions;
- (5) The availability of alternative tuition plans (may include guaranteed tuition plans); and
- (6) The total annual grant aid awarded to undergraduate students enrolled at the institution, from the Federal government, a State, the institution, and other sources known by the institution.

New student financial aid items, previously announced as optional in 2008-09 and mandatory in 2009-10, will be mandatory in 2008-09 instead.

Two of the items on the Consumer Information list that are not currently collected in IPEDS will not be required until 2010 or later:

- (1) Average net price for students receiving Federal student financial aid, disaggregated by income categories, for the most recent academic year (for the period beginning 7/1/2010 and ending 6/30/2013);
- (2) Beginning 7/1/2013, the average net price for students receiving Federal student financial aid, disaggregated by income categories, for each of the three most recent academic years.

New Institutional Disclosures. The Higher Education Act includes several items of information that institutions are required to make available to current and prospective students. New disclosure requirements in the HEOA include:

- (1) Any plans by the institution for improving the academic program;
- (2) Student body diversity, including the percentage of full-time students who--
 - (a) are male,
 - (b) are female,
 - (c) receive a Federal Pell Grant,

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- (d) who are self-identified members of a major racial or ethnic group. (The gender and race/ethnic information currently is collected in the IPEDS Fall Enrollment Survey, but not required, under the HEA, to be disclosed);
- (3) Information on the placement in employment of, and types of employment obtained by, graduates of the institution's degree or certificate programs;
- (4) Information on the types of graduate and professional education in which graduates of the institution's four-year degree programs enrolled;
- (5) The retention rate of certificate- or degree-seeking, first-time, full-time, undergraduate students entering the institution (currently collected in IPEDS Fall Enrollment Survey, but not required, under the HEA, to be disclosed);
- (6) Data on completion and graduation rates for students who:
- (a) receive a Federal Pell Grant,
 - (b) receive subsidized Federal loans and do not receive Pell Grants,
 - (c) do not receive either a subsidized Federal loan or a Pell Grant. (This requirement does not apply to two-year, degree-granting institutions until academic year 2011-2012.)

Assistance to Institutions. ED will be required each year to provide institutions with a Compliance Calendar containing information about all of the HEA reporting and disclosure requirements. ED is also required to develop recommendations regarding the calculation and reporting of completion and graduation rates by two-year degree-granting institutions, including additional or alternative measures of student success for those institutions (Sec. 485(a)(7)).

Flexibility in Graduation Rate Reporting (Sec. 485(a)(4)). The bill allows all institutions to continue to exclude from graduation rate calculations those students who leave school to serve in the Armed Forces, on official church missions, or with a recognized Federal foreign aid service. An additional option will be available for institutions for which such students represent twenty percent or more of the certificate- or degree-seeking, full-time undergraduates at the institution. Those institutions may include the students who leave for such service, but not count the time the students were not enrolled due to their service, in their graduation rate calculations.

New Federal Studies. Three studies mandated by the bill are of particular relevance to institutional researchers:

- (1) Employment of Postsecondary Education Graduates (Sec. 1102). The U.S. Government

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Accountability Office (GAO) is required to conduct a study of the information that States currently have on employment of students who have completed postsecondary education programs, the feasibility of collecting this type of information, the evaluation systems used by other industries to identify successful programs, the best means of collecting this information, and the best means of displaying employment information.

(2) Study on IPEDS (Sec. 1103). The GAO is required to conduct a study on the time and cost burdens to institutions of higher education associated with responding to IPEDS, and present recommendations for reducing such burden. In addition, the GAO is to report on the feasibility of collecting additional data from institutions for use in IPEDS, including information on the percentage of enrolled undergraduate students who graduate within two years (in the case of two-year institutions), and four, five and six years (in the case of two- and four-year institutions), disaggregated by race and ethnic background, and by income categories.

(3) Developing Additional Measures of Degree Completion (1118). The Secretary is to consult with stakeholders to make recommendations to Congress about alternative ways for institutions to measure and report degree or program completion rates. The alternative measures are to take into consideration degrees awarded disaggregated by race, ethnicity, gender, and income; and degrees awarded in high-need fields such as science, technology, engineering, mathematics, education, and nursing.

Implications for Institutions

Institutions will need to prepare immediately to produce new data to meet the new IPEDS reporting requirements under the HEA. In some cases this will require collecting new information. Since ED is required to publish the data on the Consumer Information list within one year of enactment of the HEA amendments, ED will be required to collect new data from institutions during the 2008-09 collection year.

Specific requirements for the new institutional disclosures to current and prospective students will be established through the regulatory process over the next several months.

The additional requirements will require institutions to increase resources devoted to external reporting, work across offices, and implement new collection mechanisms and analytical reporting functions.

Many institutions may find the requirements for disclosure of information about the employment and graduate/professional school enrollment for their graduates particularly challenging. Sources for such employment and post-baccalaureate enrollment data can be costly, and may be limited in their availability, reliability, and utility.

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Timeline

August 14, 2008 -- The Higher Education Opportunity Act (H.R. 4137) signed into law.

August 14, 2009 — Deadline for U.S. Department of Education to post new Consumer Information items on College Navigator website (<http://nces.ed.gov/collegenavigator/>).

Additional Resources

Legislation

The Conference Report for H.R. 4137 is available on the website of the U.S. Senate Health, Education, Labor and Pensions Committee at http://help.senate.gov/Hearings/2008_07_29_E/KOS08400_xml.pdf.

For details on the cost transparency provisions in the bill, see the summary provided by the National Association of College and University Business Officers at <http://www.nacubo.org/x10703.xml>.

IPEDS

Complete information on IPEDS, including the College Navigator website, is available at <http://nces.ed.gov/ipeds>.

Information about the changes to the 2008-09 collection that were previously announced is available at http://nces.ed.gov/IPEDS/news_room/twk_Changes_and_7_28_2008_187.asp.

Information regarding changes to 2008-09 IPEDS due to passage of Higher Education Opportunity Act of 2008 is available at http://nces.ed.gov/IPEDS/news_room/ana_Changes_to_8_22_2008_188.asp.

Regulations

For information on the regulations covering the disclosure requirements in Sec. 485 of the HEA see <http://ecfr.gpoaccess.gov/>.

For information on the Department of Education's plans for implementation of the Higher Education Opportunity Act see <http://www.ed.gov/policy/highered/leg/hea08/index.html>.

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.