

## Better Data on the Horizon: An Analysis of Evolving Student-Level Data Legislation

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*This brief describes the growing interest in strengthening postsecondary data quality and provides an overview and detailed analysis of proposed legislation that would create a federal student-level data collection.*

As reauthorization of the Higher Education Act rapidly approaches, the House of Representatives and the Senate have crafted legislation that would improve and modernize the national postsecondary data infrastructure. This bicameral emphasis on data system enhancements reflects a growing recognition that the access and use of high-quality data by students, institutions, policymakers, and researchers can advance student success. But currently available data do not sufficiently demonstrate the experience and outcomes of today's college students. In fact, the current federal data infrastructure is insufficient to answer core, student-centric questions about colleges and universities, such as:

- How many low-income, adult, transfer, and part-time students earn a postsecondary certificate or degree from a particular institution?
- How much do students borrow, and can they repay their loans?
- How long does it take students to complete college, on average?
- How many non-completers from a particular college never reenroll, and how many transfer to finish their degree at another institution?
- Do students go on to succeed in the workforce?

One proposal for strengthening data systems to promote student success more effectively is a federal student-level data system. Despite a 2008 ban in the Higher Education Act reauthorization on the creation of this type of system, interest has re-emerged and grown in recent years. Five pieces of legislation—the Higher Education Affordability Act, three versions of the Student Right to Know Before You Go Act, and the College Transparency Act—call for student-level data collection in varying forms.

### The 2008 Ban and Ongoing Calls for Better Data

Section 134 of the Higher Education Opportunity Act of 2008 (HEOA) prohibits a federal student-level data collection.<sup>2</sup> The legislative language lists exemptions to this ban, including systems required for the operation of programs (e.g., the National Student Loan Data System (NSLDS) and Central Processing System), existing federal student-level data collections, and state longitudinal data systems (SLDS). In fact, Congress recognizes the critical role that these systems play to inform educational policy and practice and has made over \$600 million in grants to almost every state through the Statewide Longitudinal Data System Grant Program to develop a SLDS.<sup>3</sup>

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<sup>1</sup> This brief builds upon an earlier brief written by Colleen E. Campbell, a former Research Analyst at IHEP.

<sup>2</sup> Higher Education Opportunity Act, Public Law 110-315, 110<sup>th</sup> Congress, (2008). Retrieved from <https://www.gpo.gov/fdsys/pkg/PLAW-110publ315/pdf/PLAW-110publ315.pdf>; For a more detailed account of how the student unit record ban came to fruition, see New America's report, *College Blackout*.

<sup>3</sup> As of 2017, 47 states, the District of Columbia, Puerto Rico, and the Virgin Islands have received at least one SLDS grant, and 45 agencies in 39 states link or plan to link K-12 and postsecondary data in their systems. Source: National Center for Education

Access to higher quality postsecondary data on institutions, and in some cases programs, has become a priority for federal policymakers, who recognize the importance of data in answering key national policy questions that will help advance postsecondary opportunity and success for students. Leaders have lamented the gaps in federal postsecondary data, and, over the past five years, many co-sponsored legislation that would markedly improve available federal data for consumer information, policymaking, and improvement purposes. To further explore this issue, many have held hearings and issued white papers on this topic. In particular, Senator Alexander released a series of white papers in early 2015, one focusing on consumer information, and held a follow-up hearing.<sup>4</sup> Congresswoman Foxx introduced the Strengthening Transparency in Higher Education Act (H.R. 3178), which would create the College Dashboard for consumer information and include measures like disaggregated graduation rates, net price, and salaries by region from the Bureau of Labor Statistics.<sup>5</sup> The Subcommittee on Higher Education and Workforce Development held a hearing on May 24, 2017 entitled “Empowering Students and Families to Make Informed Decisions on Higher Education”, which focused on the importance of transparency and data in higher education and ways to improve data systems.<sup>6</sup>

### Crafting Federal Legislation on Student-Level Data Collection

The five bills proposing federal student-level data collection have evolved over time, beginning with an initial focus on linking SLDS, and later evolving into the most recent bipartisan strategy of developing a federal student-level data system, as proposed in both the Senate and the House.

2012: *Student Right to Know Before You Go 1.0*

House	Senate
Rep. Robert Andrews (D-NJ)	Sen. Marco Rubio (R-FL)
Rep. Duncan Hunter (R-CA)*	Sen. Ron Wyden (D-OR)

Note: “\*” denotes a current member of the Senate Health, Labor, Education & Pensions (HELP) Committee or the House Education and Workforce Committee

To address the lack of comprehensive data on postsecondary students, Senators Ron Wyden (D-OR) and Marco Rubio (R-FL) introduced the Student Right to Know Before You Go Act of 2012 (S. 2098; SRTKBYG 1.0), which capitalized on the development and strengthening of state longitudinal data systems. Rep. Duncan Hunter (R-CA) introduced a companion bill (H.R. 4061) in the House. Both pieces of legislation require institutions that receive Title IV funding to report

Statistics. Grantee States. Retrieved from <http://nces.ed.gov/Programs/SLDS/stateinfo.asp>; and State Higher Education Executive Officers Association and Complete College America. Retrieved from [http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/building\\_a\\_student-level\\_data\\_system.pdf](http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/building_a_student-level_data_system.pdf)

<sup>4</sup> Senator Alexander’s white papers and request for comments can be found here: <https://www.help.senate.gov/chair/newsroom/press/alexander-seeks-input-from-higher-ed-community-on-accreditation-risk-sharing-and-consumer-information>; The Senate HELP Committee has held 2 hearings that either focus on, or relate to data. The first was on May 6, 2015, entitled “Reauthorizing the Higher Education Act: The Role of Consumer Information in College Choice”. The second was held on August 5, 2015, entitled “Reauthorizing the Higher Education Act: Opportunities to Improve Student Success”. <https://www.help.senate.gov/chair/newsroom/press/alexander-seeks-input-from-higher-ed-community-on-accreditation-risk-sharing-and-consumer-information>;

<sup>5</sup> Strengthening Transparency in Higher Education Act, H.R. 3178, 114<sup>th</sup> Congress (2015). Retrieved from <https://www.congress.gov/bill/114th-congress/house-bill/3178>

<sup>6</sup> “Empowering Students and Families to Make Informed Decisions on Higher Education”, May 24, 2017. Retrieved from <https://edworkforce.house.gov/calendar/eventsingle.aspx?EventID=401652>

student-level data to the Integrated Postsecondary Education Data System (IPEDS) via a state longitudinal data system or “another administering entity.”<sup>7</sup> The legislation specifies that no personally identifiable information shall be disclosed in the system and requires all student components of the IPEDS data collection to be populated and calculated using individual-level data. It also mandates a data governance system that assesses the “data quality, validity, and reliability” of state systems, a component that also would be incorporated into future iterations of this bill. SRTKBYG 1.0 was referred to the Senate Committee on Health, Education, Labor, and Pensions (HELP) before the 112<sup>th</sup> Congress ended its session, but did not receive comment from the committee.

**2013: Student Right to Know Before You Go 2.0**

House	Senate
Rep. Robert Andrews (D-NJ)	Sen. Kirsten Gillibrand (D-NY)
Rep. Duncan Hunter (R-CA)*	Sen. Jeff Merkley (D-OR)
Rep. Thomas Petri (R-WI)	Sen. Marco Rubio (R-FL)
	Sen. Brian Schatz (D-HI)
	Sen. Mark Warner (D-VA)
	Sen. Ron Wyden (D-OR)

Note: “\*” denotes a current member of the Senate HELP Committee or the House Education and Workforce Committee

In 2013, Senators Wyden and Rubio, joined by Senator Mark Warner (D-VA), introduced the Student Right to Know Before You Go Act of 2013 (S. 915) and Rep. Duncan Hunter (R-CA) introduced a companion bill in the House (H.R. 1937). SRTKBYG 2.0 took another tack to improving postsecondary data. Instead of stitching together state data systems, it created an exception to the HEOA ban on new unit record systems and established a federal student-level data collection. This exception allows the student-level data to replace IPEDS reporting and establishes more robust progress and outcome measures, including remedial status, transfer rates, outcomes disaggregated by federal aid receipt, and loan debt.

Like the 2012 version of the Student Right to Know Before You Go Act, this legislation also allows the calculation and publication of metrics at the program and institution levels. The legislation streamlines reporting, allowing states to report student-level data on behalf of institutions, and specifies additional measures, such as rates of subsequent enrollment in postsecondary education, as well as earnings data populated from the Social Security Administration.<sup>8</sup> This legislation was referred to the Senate HELP Committee, but was not taken up by the committee.

<sup>7</sup> Student Right to Know Before You Go Act, S. 2098, 112<sup>th</sup> Congress (2012). Retrieved from <http://www.gpo.gov/fdsys/pkg/BILLS-112s2098is/pdf/BILLS-112s2098is.pdf>

<sup>8</sup> Senator Ron Wyden. “The Student Right to Know Before You Go Act of 2013.” Retrieved from <http://www.wyden.senate.gov/download/?id=2c03a032-15bc-48b4-8f80-db3729103a6b&download=1>

2014: *Higher Education Affordability Act*

Senate
Sen. Tom Harkin (D-IA)

The second draft of Senator Harkin’s Higher Education Affordability Act (HEAA), released in November 2014, also calls for the collection of student-level data at the federal level. This legislation does not strike the ban on a unit record system; rather, it creates an exception that requires federal student-level data to replace IPEDS surveys and data elements, and to populate additional, more robust, outcome measures. Senator Harkin’s bill borrows significant portions of SRTKBYG 2.0, in places providing more specificity. For example, instead of stating only “student components” of IPEDS be replaced with student-level data, HEAA specifically lists the surveys to be replaced by the new collection. It also specifies several new data measures to be calculated with the new student-level data, including outcome measures disaggregated by enrollment in remedial education, military/veteran status, and financial aid status.

2015: *Student Right to Know Before You Go 3.0*

House	Senate
Rep. John Carney Jr. (D-DE)	Sen. Tom Cotton (R-AR)
Rep. Susan Davis (D-CA)*	Sen. Marco Rubio (R-FL)
Rep. Trey Gowdy (R-SC)	Sen. Pat Toomey (R-PA)
Rep. Joseph Heck (R-NV)	Sen. Mark Warner (D-VA)
Rep. Duncan Hunter (R-CA)*	Sen. Ron Wyden (D-OR)
Rep. Doug LaMalfa (R-CA)	
Rep. Mia Love (R-UT)	
Rep. Scott Peters (D-CA)	
Rep. Jared Polis (D-CO)*	
Rep. Paul Ryan (R-WI)	
Rep. Steve Stivers (R-OH)	

Note: “\*” denotes a current member of the Senate HELP Committee or the House Education and Workforce Committee

Senators Wyden, Rubio, and Warner introduced the third iteration of the Student Right to Know Before You Go Act (S. 1195) in the Senate in May 2015 and were later joined by Senators Cotton and Toomey. A bipartisan group, including Representatives Hunter (R-CA), Carney Jr. (D-DE), Davis (D-CA), Gowdy (R-SC), Heck (R-NV), LaMalfa (R-CA), Love (R-UT), Peters (D-CA), Polis (D-CO), Ryan (R-WI), and Stivers (R-OH) co-sponsored a companion bill (H.R. 2518) in the House. This bill is very similar to its SRTKBYG 2.0 predecessor in replacing the student components of IPEDS with individual data collection and mandating specific disaggregates and additional measures, with a few notable differences. Compared with earlier versions, it includes more specific language about privacy, requiring the Secretary of Education to issue guidelines to institutions regarding the amendments for annual privacy notices required under the Family Educational Rights and Privacy Act (FERPA).

This legislation explicitly defines personally-identifiable information (PII),<sup>9</sup> lists allowable uses of student-level data, and increases the penalty for willful disclosure of PII. The bill describes how the data would be protected, prohibits the sale of data, and prohibits PII in the system from being used to take action against students. For researchers, the law would make available a non-PII dataset for studies or evaluations approved by the Institute of Education Sciences. SRTKBYG 3.0 was referred to the Senate HELP Committee before the 114<sup>th</sup> Congress ended its session, but did not receive comment from the committee.

2017: *The College Transparency Act*

House	Senate
Rep. Don Bacon (R-NE)	Sen. Bill Cassidy (R-LA)*
Rep. Neal Dunn (R-FL)	Sen. Orrin Hatch (R-UT)*
Rep. A. Drew Ferguson (R-GA)*	Sen. Elizabeth Warren (D-MA)*
Rep. Thomas Garrett (R-VA)*	Sen. Sheldon Whitehouse (D-RI)*
Rep. Raja Krishnamoorthi (D-IL)*	
Rep. Jason Lewis (R-MN)*	
Rep. Roger Marshall (R-KS)	
Rep. Paul Mitchell (R-MI)*	
Rep. Jimmy Panetta (D-CA)	
Rep. Jared Polis (D-CO)*	
Rep. Lloyd Smucker (R-PA)*	
Rep. Elise Stefanik (R-NY)*	
Rep. Steve Stivers (R-OH)	
Rep. Fred Upton (R-MI)	

Note: "\*" denotes a current member of the Senate HELP Committee or the House Education and Workforce Committee

Senators Hatch (R-UT), Warren (D-MA), Cassidy (R-LA) and Whitehouse (D-RI) introduced the College Transparency Act (CTA) (S. 1121) in May 2017. Representatives Mitchell (R-MI) and Polis (D-CO) introduced a companion bill in the House (H.R.2434) shortly thereafter, with co-sponsors, including Representatives Bacon (R-NE), Dunn (R-FL), Ferguson (R-GA), Garrett (R-VA), Krishnamoorthi (D-IL), Lewis (R-MN), Marshall (R-KS), Panetta (D-CA), Smucker (R-PA), Stefanik (R-NY), Stivers (R-OH), and Upton (R-MI). Importantly, this bill is sponsored by 4 members of the Senate HELP Committee and 8 members of the House Education and Workforce Committee, creating a foundation of committee support for the bill.

The legislation removes the ban on a federal student-level data collection, creating a secure, privacy-protected system that would be housed at the National Center for Education Statistics. The system would replace the student components of the IPEDS survey and create more complete

<sup>9</sup> Personally Identifiable Information is defined as: student name, name of student’s parents or other family members, address of student or family, personal identifier (Social Security number or biometric record), indirect identifiers (date of birth, place of birth, mother’s maiden name), “other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty”, or “information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates”. This language is consistent with the regulatory definition of PII under FERPA (34 CFR § 99.3).

measures of student outcomes. It also explicitly states that with this system, the Department of Education (ED) should coordinate and create secure data linkages between other federal agencies, like the Department of Treasury, the Department of Veterans Affairs (VA), the Social Security Administration (SSA), the Office of Federal Student Aid, and the Bureau of the Census, with the intention of streamlining data collection and reporting requirements to the federal government. CTA requires that ED develop, at minimum, a user-friendly consumer information website with aggregate data to help students and institutions inform their decision-making. Like SRTKBYG 3.0, CTA places a heavy emphasis on privacy and security, limiting data disclosures and policing permissible uses of the data, as well as prescribing data security measures.

## **Detailed Comparison of Student-Level Data Collection Legislation**

These five pieces of legislation represent an evolution of student-level data collection policies. To inform ongoing conversations about national student-level data collections, the descriptions below detail system purpose, Congressional support, governance and data privacy and security, data standards, data measures, and data disaggregates.

### *Purpose of Proposed Data Systems*

Each piece of legislation expresses the interest of policymakers to begin federal collection of student-level data to streamline collection and reporting to answer questions about higher education. All five bills propose using the data collected to fulfill some IPEDS reporting requirements and to provide robust information for consumers. The most recent four bills allow institutions access to the data at some level for improvement and evaluation purposes. Other proposed uses for the data collection include policy development and statistical reports and research studies. CTA limits ED's use of data by prohibiting a federal ranking system or a system that results in a summative federal rating of postsecondary institutions.

### *Congressional Support*

Since the introduction of SRTKBYG 2.0, bipartisan, bicameral support to strengthen the national postsecondary data infrastructure has grown. Federal student-level data collection is now at the forefront of policymaker conversations as a means to replace components of IPEDS and provide higher quality data. Notably, every draft of the SRTKBYG has had both Republican and Democratic support; co-sponsors not only represent both parties, but also many regions of the United States. CTA boasts bipartisan, bicameral co-sponsors, many of which are members of the Senate HELP and House Education and Workforce committees. It is clear that sound data policy is not, and should not be, a partisan issue. A crosswalk of bill sponsors is available in Appendix Table A1.

### *Governance and Data Privacy and Security*

The SRTKBYG legislation, CTA, and HEAA share similar governance structures. In particular, SRTKBYG 2.0, 3.0, CTA, and HEAA are very similar, even providing the same timeframe within which data components in the system must be reviewed and subsequently made available publicly. SRTKBYG 3.0 adds more specific provisions designed to protect students and their data and CTA requires that security protections be designed in accordance with the most recent federal standards, developed by the National Institute of Standards and Technology. CTA also prohibits the collection of especially sensitive data including disciplinary records, religion, citizenship or national origin, and health data.

Other common governance themes between the legislation include:

- FERPA Compliance
- Allowance for states to report institutional data
- Robust data governance and audit systems
- Prohibitions for use of data
- Penalty for data misuse
- Public access only to aggregate to data

For more information, see Appendix Table A2.

### *Data Standards*

Required data standards vary by approach to a federal unit record data collection (see Appendix Table A3 for a detailed crosswalk). SRTKBYG 1.0 requires the use of the Common Education Data Standards (CEDS), a voluntary initiative within ED that facilitates the exchange and comparison of data from various systems.<sup>10</sup> Mandating CEDS or another similar system would be necessary in a federated system, where multiple databases are being stitched together. However, the CEDS mandate was dropped in subsequent legislation, as federal student-level data collection standards would define data elements for all participating institutions.

To signal the importance of inclusive data components and community input, SRTKBYG 2.0, 3.0, HEAA, and CTA require ED to seek input from stakeholders in developing the system. Additionally, each piece of legislation requires coordination within ED and with other agencies, including the SSA, Departments of Defense and VA. SRTKBYG 1.0 also includes language on linkages with the Workforce Innovation and Opportunity Act (WIOA) and Perkins Career and Technical Education Act systems. Leveraging data already collected by the federal government can alleviate the burden on institutions and create data commonality across legislation and agencies.

### *Additional Data Measures Beyond Current IPEDS Collection*

In addition to those already collected in IPEDS, each piece of legislation outlines additional data measures that must be collected and published via the student-level data collection system. Many similarities exist between the SRTKBYG 2.0, 3.0, HEAA, and CTA and Appendix Table A4 outlines the metrics in detail. Metric categories are generally consistent across many of the bills, including:

Enrollment

Completion Rates

Transfer Rates

Financial Aid

Post-College Outcomes

### *Disaggregated Outcome Data*

The term “outcome data” in SRTKBYG 2.0, 3.0, HEAA, and CTA is broadly construed to mean any additional measures that are added to the IPEDS data collection by the student-level data legislation. While SRTKBYG 1.0 does not specify disaggregates, it allows the Secretary of Education to determine additional data elements necessary “to address alignment and adequate preparation for and success in postsecondary education.”<sup>11</sup>

<sup>10</sup> Common Education Data Standards. What is CEDS. Retrieved from <https://ceds.ed.gov/whatsCEDS.aspx>

<sup>11</sup> Student Right to Know Before You Go Act, S. 2098, 112<sup>th</sup> Congress (2012). Retrieved from <http://www.gpo.gov/fdsys/pkg/BILLS-112s2098is/pdf/BILLS-112s2098is.pdf>

Some disaggregates of interest across these four bills include:

- Enrollment status
- Attendance intensity
- Federal aid receipt (including Pell Grant receipt status)
- Veteran or military status

Additional details can be found in Appendix Table A5.

### **Next Steps**

The introduction of this series of bills calling for federal student-level data collection signals that policymakers on both sides of the aisle agree that existing data are insufficient to answer critical questions about the American postsecondary system. Lawmakers also have identified a pressing need to strengthen our data systems in ways that reduce institutional reporting burden and promote more effective data use to serve students. Additionally, established by bipartisan legislation, the Commission on Evidence-based Policymaking is currently developing a strategy for increasing the availability and use of existing federal administration data to build evidence and inform policymaking efforts.<sup>12</sup>

As part of ongoing advocacy efforts from the Postsecondary Data Collaborative, over 80 organizations signed on in support of CTA, representing a wide range of interests and stakeholders and demonstrating the groundswell of support outside of Congress.<sup>13</sup> With both sides of the aisle and both chambers introducing bills that promote better public information about our higher education system through student-level data collection, policymakers must continue engaging in robust conversation about how our national data infrastructure can be improved to best serve students.

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<sup>12</sup> For more information on the Commission on Evidence-based Policymaking, visit their website: <https://www.cep.gov/> <https://www.cep.gov/> <https://www.cep.gov/>

<sup>13</sup> Postsecondary Data Collaborative and Workforce Data Quality Campaign statement on the College Transparency Act. Retrieved from <http://www.ihep.org/press/opinions-and-statements/postsecondary-data-collaborative-and-workforce-data-quality-campaign>



Appendix:

<b>Table A1: Congressional Support</b>					
<b>Co-Sponsors</b>	<b>SRTKBYG 1.0 (S. 2098/ H.R. 4061)</b>	<b>SRTKBYG 2.0 (S. 915/ H.R. 1937)</b>	<b>HEAA</b>	<b>SRTKBYG 3.0 (S. 1195/ H.R. 2518)</b>	<b>CTA (S. 1121/ H.R. 2434)</b>
<b>Senate</b>					
Sen. Bill Cassidy (R-LA)*					X
Sen. Tom Cotton (R-AR)				X	
Sen. Kirsten Gillibrand (D-NY)		X			
Sen. Tom Harkin (D-IA)†			X		
Sen. Orrin Hatch (R-UT)*					X
Sen. Jeff Merkley (D-OR)		X			
Sen. Marco Rubio (R-FL)	X	X		X	
Sen. Brian Schatz (D-HI)		X			
Sen. Pat Toomey (R-PA)				X	
Sen. Mark Warner (D-VA)		X		X	
Sen. Elizabeth Warren (D-MA)*					X
Sen. Sheldon Whitehouse (D-RI)*					X
Sen. Ron Wyden (D-OR)	X	X		X	
<b>House of Representatives</b>					
Rep. Robert Andrews (D-NJ)†	X	X			
Rep. Don Bacon (R-NE)					X
Rep. John Carney Jr. (D-DE)†				X	
Rep. Susan Davis (D-CA)				X	
Rep. Neal Dunn (R-FL)					X
Rep. A. Drew Ferguson (R-GA)*					X
Rep. Thomas Garrett (R-VA)*					X
Rep. Trey Gowdy (R-SC)				X	
Rep. Joseph Heck (R-NV)				X	
Rep. Duncan Hunter (R-CA)*	X	X		X	
Rep. Raja Krishnamoorthi (D-IL)*					X
Rep. Doug LaMalfa (R-CA)				X	
Rep. Jason Lewis (R-MN)*					X
Rep. Mia Love (R-UT)				X	
Rep. Roger Marshall (R-KS)					X
Rep. Paul Mitchell (R-MI)*					X

Rep. Jimmy Panetta (D-CA)					X
Rep. Scott Peters (D-CA)				X	
Rep. Thomas Petri (R-WI)+		X			
Rep. Jared Polis (D-CO)				X	X
Rep. Paul Ryan (R-WI)				X	
Rep. Lloyd Smucker (R-PA)*					X
Rep. Elise Stefanik (R-NY)*					X
Rep. Steve Stivers (R-OH)				X	X
Rep. Fred Upton (R-MI)					X

Note: "\*" denotes a current member of the Senate HELP Committee or the House Education and Workforce Committee.

"+" denotes that the member is no longer serving in Congress.

<b>Table A2: Governance and Data Privacy and Security</b>					
	<b>SRTKBYG 1.0 (S. 2098/ H.R. 4061)</b>	<b>SRTKBYG 2.0 (S. 915/ H.R. 1937)</b>	<b>HEAA</b>	<b>SRTKBYG 3.0 (S. 1195/ H.R. 2518)</b>	<b>CTA (S. 1121/ H.R. 2434)</b>
<i>Privacy and Security</i>					
Defines personally identifiable information (PII)				X	
Protects PII by limiting access to the unit record system	X	X	X	X	X
Complies with FERPA	X	X	X	X	X
Privacy controls are reviewed periodically to ensure protection of data and limited access, use and disclosure				X	X
<i>Reporting</i>					
Allows states to report data for institutions	X	X	X	X	X
Provides public access to de-identified and/or aggregate data		X	X	X	X
Creates a public information website and hotline about the system			X		
<i>Data Governance</i>					
Establishes data audit and governance systems	X	X	X	X	X
Requires Secretary to review the categories of data collected every five years		X	X	X	X
Houses the system at NCES					X
<i>Prohibitions</i>					
Prohibits use of unit record data for action against students		X	X	X	X
Prohibits sale of student data to third parties to use for marketing			X	X	X
Specifies penalties for misuse of data		X	X	X	X
Prohibits the inclusion of health, disciplinary, K-12, citizenship, or religious data					X
Prohibits the use of data for a federal rankings system					X

<b>Table A3: Data Standards</b>					
	<b>SRTKBYG 1.0 (S. 2098/ H.R. 4061)</b>	<b>SRTKBYG 2.0 (S. 915/ H.R. 1937)</b>	<b>HEAA</b>	<b>SRTKBYG 3.0 (S. 1195/ H.R. 2518)</b>	<b>CTA (S. 1121/ H.R. 2434)</b>
Specifies that information may be collected from other federal education and job training programs, such as Job Corps	X	X			
Requires use of the Common Education Data Standards (CEDs)	X				
Involves stakeholders in developing calculation and reporting standards		X	X	X	X
Calculates information at the program and institution level		X	X	X	X
Reduces duplication in data collection	X	X	X	X	X
Requires interdepartmental and interagency coordination	X	X	X	X	X

**Table A4: Additional Data Measures Beyond Current IPEDS Collection**

	<b>SRTKBYG 1.0 (S. 2098/ H.R. 4061)</b>	<b>SRTKBYG 2.0 (S. 915/ H.R. 1937)</b>	<b>HEAA</b>	<b>SRTKBYG 3.0 (S. 1195/ H.R. 2518)</b>	<b>CTA (S. 1121/ H.R. 2434)</b>
<b>Degree/certificate-seeking status and level</b>		Degree-seeking or certificate-seeking		Degree-seeking or certificate-seeking	Credential-seeking status, by credential level
<b>Enrollment in remedial or developmental education</b>	Rates of remedial enrollment by high school completion status	Participation in remedial education at that institution		Participation in remedial education at that institution	Remedial status, may be included through regulation
<b>Financial aid information</b>		<ul style="list-style-type: none"> <li>Percent of students receiving federal grants and loans, state grants and loans, institutional grants and loans</li> <li>Average total federal debt of completers and non-completers</li> </ul>	<ul style="list-style-type: none"> <li>Dollar amount and number of students receiving federal, state, institutional, and private grants and loans</li> <li>Cumulative debt, disaggregated by undergraduate/graduate and completion status</li> </ul>	<ul style="list-style-type: none"> <li>Percent of students receiving federal grants and loans, state grants and loans, institutional grants and loans</li> <li>Average total federal debt of completers and non-completers</li> </ul>	<ul style="list-style-type: none"> <li>Typical grant amounts and loan amounts received by students reported separately from Federal, State, local, and institutional sources, by completion status and all other required disaggregates (see Table A5)</li> <li>Cumulative debt, by completion status and all other required disaggregates (see Table A5)</li> </ul>
<b>Credit accumulation/Progression</b>	Rates of credit accumulation by high school completion				Gateway course completion, may be included through regulation
<b>Persistence rates</b>			100%, 150%, 200% of normal time		
<b>Transfer rates</b>		Disaggregated by sector of receiving institution	100%, 150%, 200% of normal time; disaggregated by level of receiving institution	Disaggregated by sector of receiving institution	Disaggregated by federal grant recipient status, federal loan receipt status, and all other required disaggregates (see Table A5)

<b>Completion rates</b>	Disaggregated by high school completion status	Percentage of students who receive the degree level initially sought	<ul style="list-style-type: none"> <li>• 100%, 150%, 200% of normal time</li> <li>• Separate rates for master's, professional, and doctoral-level students</li> </ul>	Percentage of students who receive the degree level initially sought	Disaggregated by federal grant recipient status, federal loan receipt status, and all other required disaggregates (see Table A5)
<b>Subsequent enrollment</b>		Only in higher levels of education	Any level; disaggregated by undergraduate/graduate	Only in higher levels of education	Further education rate
<b>Earnings data (published at the program, institution, and state levels)</b>	Average annual; disaggregated by degree received and employment sector	Median annual; 2, 6, 15 years after completion; disaggregated by credential received	2, 5, 10 years after completion; disaggregated by completion status and undergraduate/graduate level	Median annual; 2, 6, 15 years after completion; disaggregated by credential received	Median earnings, immediately after leaving postsecondary education and at appropriate intervals
<b>Loan repayment rates</b>			Disaggregated by completion status and undergraduate/graduate level		<ul style="list-style-type: none"> <li>• Immediately after leaving postsecondary education and at appropriate intervals</li> <li>• Repayment plan</li> </ul>

*Note: Empty boxes in this table indicate that the measure was not explicitly outlined in the legislative language. In all five pieces of legislation, existing IPEDS elements would be populated with student-level data.*

**Table A5: Disaggregated Outcome Data**

	<b>SRTKBYG 1.0 (S. 2098/ H.R. 4061)</b>	<b>SRTKBYG 2.0 (S. 915/ H.R. 1937)</b>	<b>HEAA</b>	<b>SRTKBYG 3.0 (S. 1195/ H.R. 2518)</b>	<b>CTA (S. 1121/ H.R. 2434)</b>
<b>Disaggregates</b>		<ul style="list-style-type: none"> <li>• Enrollment status: First-time, full-time; first-time, part-time; non-first-time, full-time; non-first-time, part-time</li> <li>• Enrollment intensity: full-time only, part-time only, mixed enrollment</li> <li>• Financial aid status: Pell receipt, Stafford Loan but no Pell receipt, and no Stafford Loan or Pell receipt</li> <li>• Veteran status</li> </ul>	<ul style="list-style-type: none"> <li>• Enrollment status: First-time, full-time at entry; first-time, part-time at entry; transfer, full-time at entry; transfer, part-time at entry</li> <li>• Race and ethnicity</li> <li>• Gender</li> <li>• Degree/certificate-seeking status</li> <li>• Enrollment in remedial education</li> <li>• Disability status</li> <li>• Financial aid status: Pell receipt, Stafford Loan but no Pell receipt, and no Stafford Loan or Pell receipt</li> <li>• Age range</li> <li>• Veteran or military status</li> <li>• Undergraduate/graduate level</li> </ul>	<ul style="list-style-type: none"> <li>• Enrollment status: First-time, full-time; first-time, part-time; non-first-time, full-time; non-first-time, part-time</li> <li>• Enrollment intensity: full-time only, part-time only, mixed enrollment</li> <li>• Financial aid status: Pell receipt, federal loan under part B or D but no Pell receipt, and no federal loan under part B or D or Pell receipt</li> <li>• Veteran or military status</li> </ul>	<ul style="list-style-type: none"> <li>• Enrollment status as a first-time student</li> <li>• Attendance intensity, full-time or part-time</li> <li>• Credential-seeking status, by credential level</li> <li>• Race or ethnicity</li> <li>• Age intervals</li> <li>• Gender</li> <li>• Program of Study</li> <li>• Military or veteran status</li> <li>• Status as a postsecondary athlete</li> <li>• Federal Pell Grant receipt status</li> <li>• Federal loan receipt status (for some metrics)</li> <li>• Completion status (for some metrics)</li> <li>• First generation status*</li> <li>• Economic status*</li> </ul>

Note: "\*" denotes that the measure can be added through regulations.