Implementing a Federal Student-Level Data Network:

ADVICE FROM EXPERTS

Erin Dunlop Velez and Josh Pretlow, RTI International
Amanda Janice Roberson, IHEP

RTI INTERNATIONAL

IHEP

INTRODUCTION

Important questions about the U.S. system of higher education cannot be answered with existing data. To many stakeholders, the current federal postsecondary data collections, though comprised of high-quality data, do not provide a full picture of all students and all outcomes, because they are collected at varied levels of granularity and for different purposes. Without complete representation of all students' access, progress, completion, costs, and outcomes, stakeholders—including prospective students, institution leaders, and state and federal policymakers—are unable to make fully informed postsecondary choices and policy decisions.

Congress has shown renewed interest in reshaping the country's postsecondary data collections to increase data availability and utility and has introduced legislation in both the U.S. House of Representatives (e.g., College Affordability Act [CAA], College Transparency Act [CTA]) and in the U.S. Senate (e.g., companion CTA bill). These bills share language that mandates the creation of a student-level data network (SLDN) to provide important, aggregate information on all postsecondary students and their outcomes for stakeholders. If Congress passes and the President signs either of these bills into law, the National Center for Education Statistics (NCES) will be responsible for constructing and implementing the data system. The legislation defers to NCES to design the precise structure, governance, technology, and data definitions, which would be determined in the implementation and regulatory processes.

To inform the development of a potential federal SLDN, RTI International,[1] an independent nonprofit institute with extensive experience with federal postsecondary data collection, partnered with the Institute for Higher Education Policy (IHEP)—leader of the Postsecondary Data Collaborative—to engage a diverse array of stakeholders in conversation. Should Congress pass legislation to create the SLDN, these expert insights will help inform its implementation.

Without complete representation of all students' access, progress, completion, costs, and outcomes, stakeholders—including prospective students, institution leaders, and state and federal policymakers—are unable to make fully informed postsecondary choices and policy decisions.

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1   RTI International conducts several postsecondary education data collections on behalf of NCES, including Integrated Postsecondary Education Data System (IPEDS), National Postsecondary Student Aid Study (NPSAS), Baccalaureate and Beyond Longitudinal Study (B&B), and Beginning Postsecondary Students Longitudinal Study (BPS). For this effort, however, RTI is acting independently, not on behalf of NCES.

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PROCESS
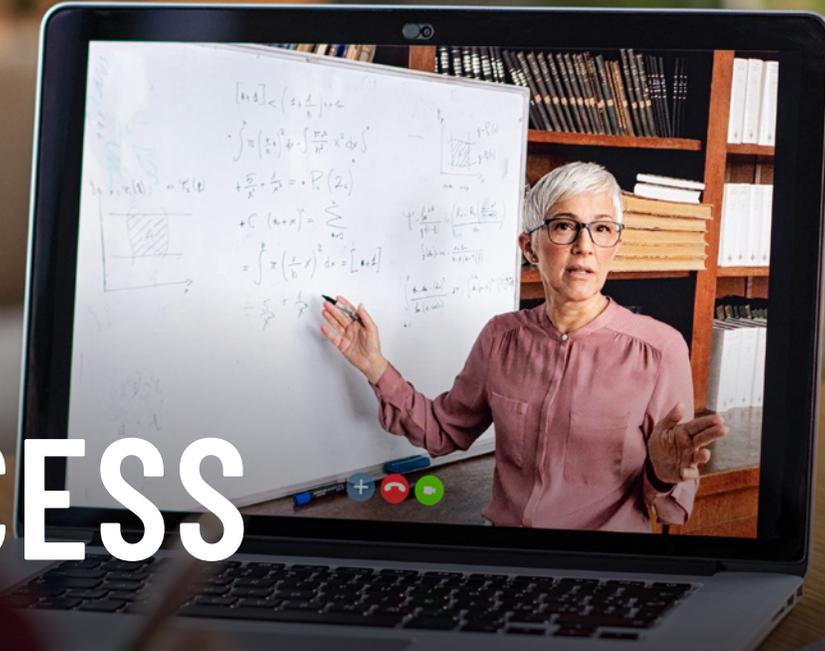
IN JUNE 2020, RTI and IHEP convened a virtual forum of 15 representatives from institutions, state systems of higher education, advocacy groups, and higher education associations (see Appendix A). To prepare for the forum, we reviewed the legislation to identify the data elements and metrics necessary to implement the SLDN. Although the legislation mentions certain measures specifically, it also requires that the SLDN collect all elements currently captured by the student-related surveys in the Integrated Postsecondary Education Data System (IPEDS), which we also reviewed. Current legislation does not mandate precise definitions for most data elements, so we generated definitional options to meet the CAA requirements, maximize the quality and utility of the data, and minimize the burden on institutions (see Appendix B).

All forum participants have extensive experience in postsecondary data and policy, including designing, populating, and maintaining large student-level data systems. We asked participants to review the required data elements to prepare for the 3-hour forum. During the forum, panelists discussed the availability of the information, opportunities presented by the SLDN, obstacles and solutions to reporting student-level information, foreseeable data quality issues and mitigation strategies, and institution resources necessary to collect student-level data. Rather than make specific recommendations, this report highlights our findings from the forum that warrant further investigation, provides a variety of stakeholder perspectives on how the SLDN could collect and define data, and identifies potential definitional challenges to proactively address during implementation.

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FINDINGS

IN EACH SECTION, we enumerate the data elements required in the CAA and discuss participant feedback on those elements. We present more detailed information in Appendix B, such as the specific legislative language requiring the element, whether the element is currently included in IPEDS, and the source of the information.

Enrollment and Completion

To meet the proposed legislative requirements, the SLDN needs to collect the data elements shown in Figure 1, most of which IPEDS also requires. The one exception is a measure of **participation in remedial coursework**.

Overall, panelists expressed few concerns about the availability of data and institution resources required for measures of enrollment and completion. Some participants saw the establishment of an SLDN as an opportunity to reevaluate current IPEDS definitions, as detailed by the following examples:

■ Panelists raised concerns about operationalizing the current IPEDS definition of **distance education**[2] in the student-level context, wondering if the definition could be expanded to capture programs that were conducted partially online, or courses that were conducted primarily—but not exclusively—online. Panelists argued that NCES should reconsider this definition especially because modalities of instruction are currently in flux due to the COVID-19 pandemic.

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2   IPEDS defines a "distance education course" as "a course in which the instructional content is delivered exclusively via distance education." In the fall enrollment IPEDS survey, institutions must report whether students are enrolled exclusively in distance education courses, enrolled in at least one but not all distance education courses, or not enrolled in any distance education courses.

- IPEDS requires that institutions report student **transfer**[3] status (e.g., "transfer-in" and "transfer-out" students). Student pathways through postsecondary education are increasingly nonlinear and varied, however. The SLDN will reveal nuanced and detailed measures of student pathways across institutions (e.g., co-enrollment, swirl between institutions) because it will capture the full and concurrent enrollment of students.

- Because participation in **remedial education**[4] is not currently collected in IPEDS, panelists agreed that NCES should carefully consider its definition, especially given that many institutions are transitioning to co-requisite or self-placement models.

Panelists provided examples of how the SLDN could collect different information and simultaneously reduce institution burden and increase data quality by calculating measures within the SLDN, as opposed to having each institution calculate its own measures. NCES could conduct standardized calculations if the SLDN collects the following information:

- Credits attempted (to measure **attendance intensity**);

- High school graduation date[5] (to determine whether the student **graduated from high school within the past 12 months**); and

- Program length (to be used in combination with enrollment and completion information already collected to measure whether students **completed within 100%, 150%, or 200% of normal time**).

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3   IPEDS defines a "transfer-in student" as "a student entering the reporting institution for the first time but known to have previously attended a postsecondary institution at the same level (e.g., under-graduate, graduate)" and a "transfer-out student" as "a student that leaves the reporting institution and enrolls at another institution." IPEDS advises that, for systems of coordinated institutions (i.e., multicampus systems), students should be identified as transfer-out students when they leave an institution to enroll into another institution within the same coordinated system.

4   Although remedial education is not included in current IPEDS student-related data collection, IPEDS defines "remedial courses" as "instructional courses designed for students deficient in the general competencies necessary for a regular postsecondary curriculum and educational setting."

5   The bills prohibit inclusion of secondary school data and it is unclear if high school graduation date would conflict with this prohibition.

Financial Aid

The new legislation proposes supplementing the financial aid measures collected in IPEDS with other key data elements, including **military or veteran benefit status, cumulative student debt, loan repayment status**, and **repayment plan**. Figure 2 presents the measures of financial aid required by the legislation.

Stakeholders weighed the benefits of collecting additional financial aid data beyond the level of detail presently captured by IPEDS and the potential associated burden on institutions. For example, the proposed SLDN legislation does not require institutions to report whether student aid (e.g., **institution and private grant aid**) is based on need. Participants expressed that this is an important, policy-relevant distinction. However, they also commented that some institutions do not record this level of detail consistently, particularly for private grants, since IPEDS does not require it. The panelists also raised questions such as the following:

- Should the SLDN collect information on awarded as well as disbursed aid?

- Should **state and local grants** be separated into distinct categories?

- Should **nonfederal loans** be disaggregated to distinguish private loans from institution, state, and other third-party loans?

> **FIGURE 2**
>
> **Data Elements Required by Current SLDN Legislation: Financial Aid**
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> ---
>
> ☐ Pell Grant
> ☐ State/local grants
> ☐ Institution grants
> ☐ Grants from third parties (private)
> ☐ Federal loans
> ☐ Nonfederal loans
> ☐ In-state/out-of-state tuition flag
> ☐ Title IV flag
> ☐ Post 9-11 GI Bill
> ☐ Department of Defense (DOD) Tuition Assistance Program (TA) aid
> ☐ Military or veteran benefit status*
> ☐ Cumulative student debt*
> ☐ Loan repayment status*
> ☐ Repayment plan*
>
> *Indicates elements not currently collected in IPEDS.*

Participants noted that as postsecondary education financing changes (e.g., the introduction of community college promise programs), the SLDN will need to be flexible so it accommodates new and relevant concepts. To support its flexibility and modernization, the legislation requires the Postsecondary Student Data System Advisory Committee to reevaluate the system and data elements every 3 years.

Participants observed that the SLDN could reduce institution burden through data sharing because information on federal grants and loans is contained in the Department of Education's National Student Loan Data System (NSLDS). They noted, however, that NSLDS was designed as a transactional database; therefore, the Office of Federal Student Aid may need to overcome challenges to provide the level of detail for information required by a SLDN. Similarly, the Veterans Benefits Administration (VBA) and DOD could provide data on veterans' and military members' education benefits to the SLDN to reduce institution burden and improve data consistency across institutions.

Financial aid is a complicated and time-dependent process. Participants shared various perspectives on definitions, timing of data submissions to the SLDN relative to when institutions reconcile their own records, and reconciliation of these data considering their values may change over the course of a school year. The discussion highlighted the need to engage financial aid administrators in more detailed implementation discussions.

Demographics

In addition to the demographic information collected in IPEDS, the new legislation requires that institutions report on **first-generation college student status, economic status, veteran status, and military status**. Figure 3 presents all required demographic measures.

The panel noted that students may report their **gender, race,** and **ethnicity** differently over time and considered how such differences could be addressed. A change in a demographic choice also may be considered sensitive information, both by the student and the institution. Consequently, panelists stridently agreed that student privacy should remain a core tenet of the legislation.

Participants also considered expanding data collection to include more students than the subset of students captured in IPEDS, especially when data exist at other federal agencies or at the institution level. For example, IPEDS collects **household income** and **living arrangement** data only for full-time, first-time degree-/certificate-seeking undergraduate students who receive Title IV federal student aid. Panelists discussed whether these elements should be collected for all filers of the Free Application for Federal Student Aid (FAFSA), or perhaps for all students.

Many demographic elements are collected currently via the FAFSA, which could be a data source for the SLDN. Certain data elements, however, such as **first-generation college student status** and **household income**, are not collected in any federal or institution system for non-FAFSA filers. The panelists questioned how to collect these data for all students.

Panelists also expressed the need for NCES to carefully consider how to define elements not currently in IPEDS. For

Participants observed that the SLDN could reduce institution burden through data sharing because information on federal grants and loans is contained in the Department of Education's National Student Loan Data System (NSLDS).

FIGURE 3

Data Elements Required by Current SLDN Legislation: Demographics

- ☐ Age
- ☐ Gender
- ☐ Race
- ☐ Ethnicity
- ☐ First-generation college student status*
- ☐ Economic status*
- ☐ Veteran status*
- ☐ Military status*
- ☐ Household income
- ☐ Living arrangement

Indicates elements not currently collected in IPEDS.

example, **first-generation college status** is a concept operationalized in different ways in the research literature and by individual institutions.

Panelists noted that the legislation does not—but should—include a measure of dependency status which impacts the types and amounts of financial aid for which a student is eligible.

Post-Completion Outcomes

CAA/CTA require that NCES collect measures of post-completion outcomes by obtaining data from other federal agencies, such as the U.S. Department of the Treasury and the U.S. Census Bureau. Figure 4 presents the outcome measures required by the proposed SLDN legislation.

Stakeholders have long advocated for the collection of college outcome information to help understand the return on investment of a postsecondary education. Post-completion outcomes currently are not collected in IPEDS; however, the U.S. Department of Education reports post-completion earnings for Title IV recipients on the College Scorecard using data from the U.S. Department of the Treasury. The proposed legislation would require cross-agency data matches to—in the case of **earnings**—produce aggregate program- and institution-level outcome data for all students, not only Title IV recipients.

Although the forum primarily focused on data provided by institutions, participants questioned one of the matches specified in the legislation. They noted that the U.S. Census Bureau has industry information in state unemployment insurance records, but panelists did not believe that the U.S. Census Bureau collects information on **occupation** for all Americans.[6] This raised a technical question about the bill's language that states, "The Commissioner shall ensure secure, periodic data matches ... with ... [the] Director of the Bureau of the Census, in order to assess the *occupational* and earnings outcomes [emphasis added]."

The outcomes listed in the legislation provoked panelist questions about disaggregation, treatment of subpopulations, and potential for data analysis, including the following:

- Would these administrative matches include and disaggregate completers and noncompleters?

- For reporting purposes, would transfer students be treated the same as native students?

- To which institution would transfer students' employment outcomes apply?

- Could NCES conduct these matches for students still enrolled in postsecondary education to understand how much students are working while enrolled?

FIGURE 4

Data Elements Required by Current SLDN Legislation: Post-Completion Outcomes

- ☐ Aggregate earnings, by institution and program*
- ☐ Employment*
- ☐ Occupation*
- ☐ Further education*

Indicates elements not currently collected in IPEDS.

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6   The U.S. Census Bureau collects occupation information through the American Community Survey, which represents a 1% sample of Americans.

The topic of federal data matches led to a discussion of what **student identifier** to use across data systems to enable matching. Participants indicated that a Social Security Number (SSN) or Taxpayer Identification Number (TIN) is required to match data across federal agencies, although these numbers can be matched securely to a random student ID within NCES to prevent the SSNs from being repeatedly sent between the institution and the SLDN.

Institution Characteristics

The CAA/CTA require that certain institution characteristics be included in the SLDN, all of which are collected in IPEDS and shown in Figure 5.

The panelists commented minimally on the topic of institution characteristics. Some asked whether student-level information is necessary, how to report **cost of attendance** that varies by program, and whether to collect only the full-time tuition rate or also the tuition rate by credit hour. Panelists also noted that collection of the institution-level surveys in IPEDS, such as Finance and Human Resources, would continue after an SLDN is created.

FIGURE 5

Data Elements Required by Current SLDN Legislation: Institution Characteristics

☐ Institution level
☐ Institution control
☐ Predominant degree awarded by institution
☐ Cost of attendance
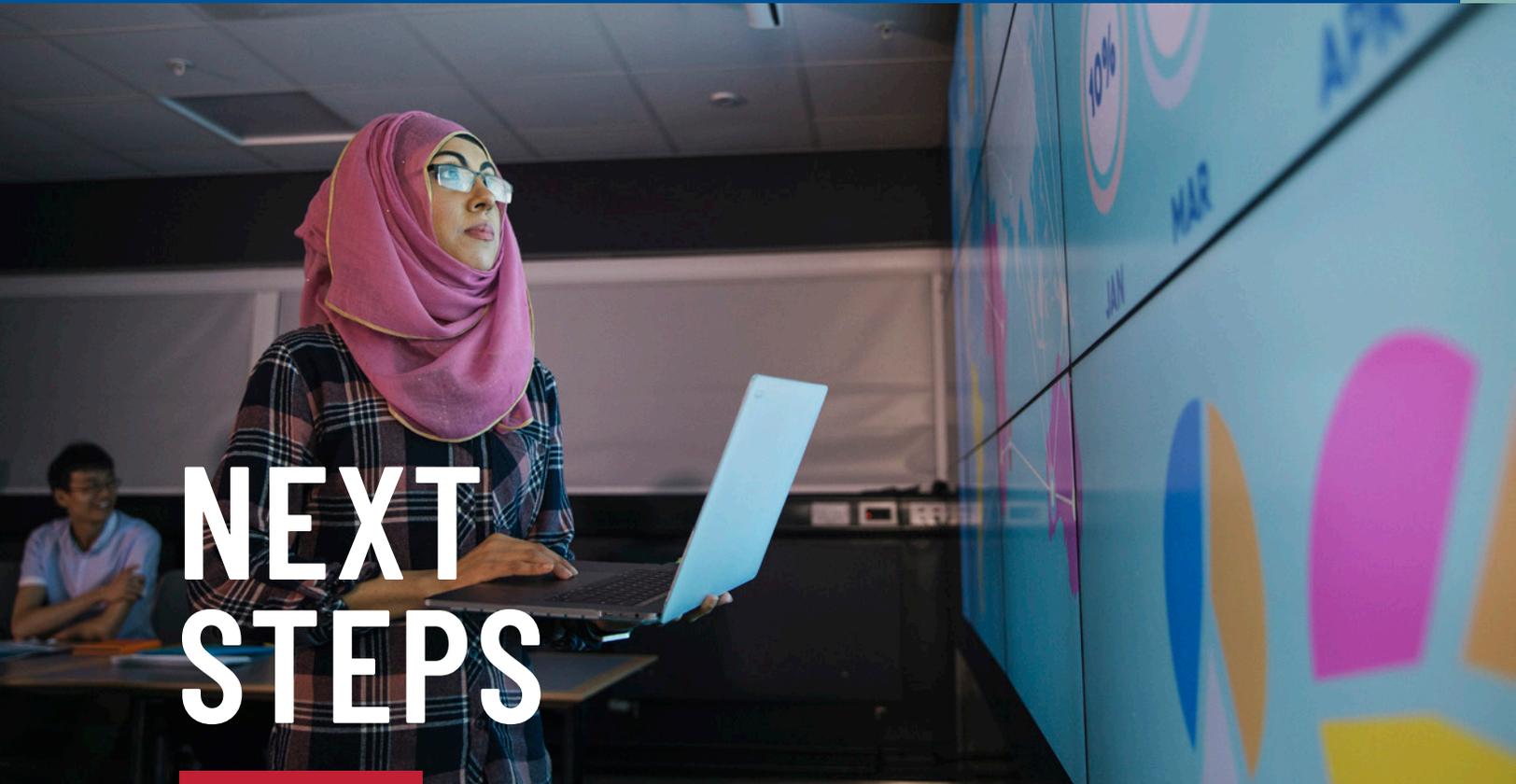
NEXT STEPS

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BUILDING THE PROPOSED SLDN will be a large but necessary undertaking for NCES and stakeholder communities if legislation is passed. To ensure a smooth implementation process, NCES and the Postsecondary Student Data System Advisory Committee must evaluate the required data elements and carefully consider the details of the concepts and specific definitions presented in the legislation. Given the importance of thoughtful and deliberate implementation of the SLDN to both maximize its utility and minimize its burden, it is critical to consider these details now to prepare for the passing of the bill.

Building on the learnings from this first forum, the following two topics warrant additional investigation:

- **EXPANDING THE CONVERSATION:** Views in this paper represent a diverse yet small number of perspectives. The implementation process will benefit from a wider range of perspectives from representatives of various types of institutions and from different offices within institutions.
- **REPORTING PROCESSES:** The panelists indicated a need to consider design questions, such as the frequency and timing of data collection, the frequency of measurement points of the data, and the process for revising data submitted by institutions.

We intend to continue these conversations to aid in the construction of the SLDN, with the complementary goals of reducing burden on institutions and generating data useful for improving postsecondary outcomes for all students nationwide.

> **Given the importance of thoughtful and deliberate implementation of the SLDN, it is critical to consider these details now to prepare for the passing of the bill.**

APPENDIX A:
LIST OF FORUM PANELISTS

Rachel Boon
STATE OF IOWA

Peace Bransberger
WESTERN INTERSTATE COMMISSION
FOR HIGHER EDUCATION

Jane Clark
DATA QUALITY CAMPAIGN

Bryan Cook
ASSOCIATION OF PUBLIC AND LAND-GRANT
UNIVERSITIES

Laurie Heacock
ACHIEVING THE DREAM

Gina Johnson
NATIONAL CENTER FOR HIGHER EDUCATION
MANAGEMENT SYSTEMS

Amy Laitinen
NEW AMERICA FOUNDATION

Susan Lounsbury
SOUTHERN REGIONAL EDUCATION BOARD

Tod Massa
STATE COUNCIL OF HIGHER EDUCATION
FOR VIRGINIA

Clare McCann
NEW AMERICA FOUNDATION

Bethany Miller
MACALESTER COLLEGE

Patrick Perry
CALIFORNIA STUDENT AID COMMISSION

Richard Reeves
UNIVERSITY OF DELAWARE

David Troutman
UNIVERSITY OF TEXAS SYSTEM

Christina Whitfield
STATE HIGHER EDUCATION EXECUTIVE
OFFICERS ASSOCIATION

APPENDIX B:
LIST OF REQUIRED DATA ELEMENTS

The College Affordability Act (CAA) and the College Transparency Act (CTA) use nearly identical language to outline required data elements for the student-level data network (SLDN) in two ways. First, both bills require the data elements necessary to calculate the information within all student-focused surveys in the Integrated Postsecondary Education Data System (IPEDS). Second, the bills mention specific data elements, some of which are not currently included in IPEDS. These data elements are discussed in conceptual terms (e.g., "participation in remedial education" or "economic status"), without the operational definitions needed to implement the legislation's requirements.

The following table presents all data elements required under the CAA or CTA in addition to the following information, per element:

- **MINIMUM TO MEET LEGISLATION:** The minimum information that could be collected to meet our interpretation of the legislation's requirement

- **BETTER OPTION TO MEET LEGISLATION:** Our suggestion of a better data element to collect to meet the legislative requirement given the desire to reduce burden on institutions while maximizing the quality and utility of the data

- **CURRENT IPEDS COMPONENT:** The IPEDS survey component(s) in which the information is currently collected. If blank, the element is not collected currently as part of the IPEDS student surveys. We abbreviate the IPEDS survey components as follows:
  - EF – Fall enrollment
  - E12 – 12-month enrollment
  - SFA – Student financial aid
  - OM – Outcome measures
  - GR – Graduation rates
  - GR200 – 200% graduation rates
  - C – Completions
  - IC – Institution characteristics

- **Reference in the CAA Legislation:** Page and line numbers where the element is specified in the CAA (https://www.congress.gov/116/bills/hr4674/BILLS-116hr4674ih.pdf)

- **Source:** Source that likely would provide the data element to the SLDN

- **Questions:** Issues raised while discussing these elements

Postsecondary Student-Level Data Network Elements Mandated by the College Affordability Act

Data Element	Options to Meet Legislation	Current IPEDS Component	Reference in the CAA Legislation	Data Source	Questions
ENROLLMENT					
Whether student was enrolled	**MINIMUM:** Binary indicator of enrollment in defined period (e.g., year, term) **BETTER:** Credits attempted in defined period (e.g., year, term), credits earned in defined period (e.g., year, term)	EF, E12, SFA, OM, GR/GR200	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	What is the periodicity of the data (both the increments of the data [e.g., every term] and how often institutions report data)? Should the new system collect noncredit enrollment?
Attendance intensity	**MINIMUM:** Full-/part-time, by term **BETTER:** Computed from credits attempted	EF, E12, SFA, OM, GR/GR200	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	
Program of study/major	**MINIMUM:** CIP for first and second major(s), once a year	C, EF	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	
Credential-seeking status	**MINIMUM:** For IPEDS: Y/N For legislation: Credential sought (i.e., certificate, AA, BA, graduate degree) in defined time period (e.g., year, term)	EF, E12, SFA, OM, C, GR/GR200	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	(Related to this item and others): Should institutions report some elements only when they change, or should they report the same data with each submission?
Student Level	**MINIMUM:** Undergraduate/ graduate/professional/ non-degree, by term	EF, E12, GR/ GR200, SFA, OM	p.48, line 20, to p.49, line 7	Institutions	
Permanent residence	**MINIMUM:** State/territory	EF	p.48, line 20, to p.49, line 7	Institutions	
Graduated high school within past 12 months	**MINIMUM:** Y/N **BETTER:** High school graduation date	EF	p.48, line 20, to p.49, line 7	Institutions	Would high school graduation date be prohibited as 'secondary education data'?

Data Element	Options to Meet Legislation	Current IPEDS Component	Reference in the CAA Legislation	Data Source	Questions
Enrolled in distance education	**MINIMUM:** Distance education (i.e., all/none/some across all courses), yearly **BETTER:** Distance education credits attempted, in defined period (e.g., year, term)	C, EF	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	Should distance education credits earned be collected? Should the SLDN capture distance education that is not 100%? How will this evolve as a result of COVID-19?
Retention/persistence	**MINIMUM:** Derived; no collection needed	EF	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	
Transfer	**MINIMUM:** Derived; no collection needed	EF, GR/GR200, OM	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	
Enrollment status (first-time, recent transfer, other non-first-time)	**MINIMUM:** Derived; no collection needed	EF, GR/GR200, OM, SFA	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	
First time at this institution	**MINIMUM:** Derived; no collection needed	EF, GR/GR200, OM, SFA	p.48, line 20, to p.49, line 7	Institutions	
Participation in remedial coursework	**MINIMUM:** Y/N **BETTER:** Remedial credits attempted in defined period (e.g., year, term)		p.51, line 15, to p.52, line 3	Institutions	Should remedial credits earned be collected? How is remedial course defined?
COMPLETION					
Credential conferred	**MINIMUM:** Credential conferred (e.g., certificate, AA, BA, MA)	C, GR/GR200, OM	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	
Completed within 100% of normal time	**MINIMUM:** Y/N **BETTER:** Length of program for award conferred	GR/GR200	p.48, line 20, to p.49, line 7	Institutions	Should time in program be calculated in addition to time in institution?
Completed within 150% of normal time	**MINIMUM:** Y/N **BETTER:** Length of program for award conferred	GR/GR200	p.48, line 20, to p.49, line 7	Institutions	
Completed within 200% of normal time	**MINIMUM:** Y/N **BETTER:** Length of program for award conferred	GR/GR200	p.48, line 20, to p.49, line 7	Institutions	

Data Element	Options to Meet Legislation	Current IPEDS Component	Reference in the CAA Legislation	Data Source	Questions
When award was conferred	**MINIMUM:** Year conferred **BETTER:** Month and year conferred	C, GR/GR200, OM	p.48, line 20, to p.49, line 7	Institutions	
CIP of awarded major(s)	**MINIMUM:** CIP for awarded major(s)	C	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	Should CIP for minors be collected (many education programs [e.g., math education] are technically "math major, education minor")?
FINANCIAL AID					
Pell Grant	**MINIMUM:** Amount awarded yearly **BETTER:** Additionally, amount disbursed yearly	GR, OM, SFA	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	NSLDS	
State/local grants	**MINIMUM:** Amount awarded yearly **BETTER:** Additionally, amount disbursed yearly	SFA	p.48, line 20, to p.49, line 7	Institutions	Should state and local sources be reported separately? Should whether the aid is need-based be collected? Should disbursed grant amounts be reported more frequently than once a year?
Institution grants	**MINIMUM:** Amount awarded yearly **BETTER:** Additionally, amount disbursed yearly	SFA	p.48, line 20, to p.49, line 7	Institutions	Should whether the aid is need-based be collected? Should disbursed grant amounts be reported more frequently than once a year?
Grants from third parties (private)	**MINIMUM:** Amount awarded yearly **BETTER:** Additionally, amount disbursed yearly	SFA	p.48, line 20, to p.49, line 7	Institutions	Should data on whether the aid is need-based be collected? Should disbursed grant amounts be reported more frequently than once a year?

Data Element	Options to Meet Legislation	Current IPEDS Component	Reference in the CAA Legislation	Data Source	Questions
Federal loans	**MINIMUM:** Amount disbursed yearly **BETTER:** Amount disbursed yearly, by loan type (e.g., Subsidized/Unsubsidized Stafford, Perkins, Grad PLUS)	GR, OM, SFA	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	NSLDS	Should Parent PLUS loans be reported?
Nonfederal loans	**MINIMUM:** Amount disbursed yearly	SFA	p.48, line 20, to p.49, line 7	Institutions	**NOTE:** This is in CAA, not CTA. What nonfederal loan data do institutions currently have? How comprehensive and reliable is institution data?
In-state/out-of-state tuition flag	**MINIMUM:** In-district/in-state/out-of-state	SFA	p.48, line 20, to p.49, line 7	Institutions	
Title IV flag	**MINIMUM:** Title IV Y/N	SFA	p.48, line 20. to p.49, line 7	Institutions	Should work-study amount awarded be collected?
Post 9-11 GI Bill	**MINIMUM:** Amount disbursed yearly	SFA	p.48, line 20, to p.49, line 7	VBA/Institutions	Should awarded amounts be collected? Should this be collected from institutions or federal matching?
DOD TA aid	**MINIMUM:** Amount disbursed yearly	SFA	p.48, line 20, to p.49, line 7	DOD/Institutions	Should awarded amounts be collected? Should this be collected from institutions or federal matching?
Military or veteran benefit status	**MINIMUM:** Y/N		p.49, line 8, to p.50, line 22	DOD/VBA	How is status defined? What benefits are included? Are children/spouses using others' benefits included? Should the amount of aid disbursed be collected?
Cumulative student debt	**MINIMUM:** Current outstanding federal and nonfederal balance (principle + interest)		pp.53–54	NSLDS	How is the nonfederal part of this collected? Should this element just be limited to federal borrowing, which can be captured in NSLDS?

Data Element	Options to Meet Legislation	Current IPEDS Component	Reference in the CAA Legislation	Data Source	Questions
Loan repayment status	**MINIMUM:** Loan repayment status (i.e., repayment, deferment, forbearance, default, paid off)		pp.53–54	NSLDS	What are the time intervals for collection? How should different statuses across loans be combined? Should percentage of principle repaid be collected?
Repayment plan	**MINIMUM:** Repayment plan (i.e., standard, graduated, income-based [e.g., PAYE, REPAYE], other)		pp.53–54	NSLDS	What are the time intervals for collection? How should different plans across loans be combined?
		DEMOGRAPHICS			
Age	**MINIMUM:** Categorical age range **BETTER:** DOB	C, EF	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	Would DOB be needed for matching? General demographic question: Should dependent/ independent status be collected for FAFSA filers (or everyone)?
Gender	**MINIMUM:** M/F	C, EF, E12, GR/ GR200, OM, SFA	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	CAA includes a pilot study for how to measure gender.
Race	**MINIMUM:** Race/ethnicity categories **BETTER:** Race with multiple additional detailed categories	C, EF, GR/ GR200, OM	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	**NOTE:** Must be reported per Education Services Reform Act (ESRA) Section 153.a.3.b., as required in CAA. Not included in CTA.
Ethnicity	**MINIMUM:** Race/ethnicity categories **BETTER:** Hispanic Y/N	C, EF, GR/ GR200, OM	p.48, line 20, to p.49, line 7; p.49, line 8, to p.50, line 22	Institutions	
First-generation college student status	**MINIMUM:** Y/N		p.51, line 15, to p.52, line 3	FAFSA	How should this be defined? How is this collected for non-FAFSA filers?
Economic status	**MINIMUM:** Derived; no collection needed (derived from Pell Grant status) **BETTER:** Household income amount for FAFSA filers		p.51, line 15, to p.52, line 3	FAFSA	How should economic status be defined and reported? Should this be collected for non-FAFSA filers?

Data Element	Options to Meet Legislation	Current IPEDS Component	Reference in the CAA Legislation	Data Source	Questions
Veteran status	**MINIMUM:** Y/N		pp.53–54	VA	What level of detail is wanted by stakeholders? Should dates of service or branch be collected?
Military status	**MINIMUM:** Y/N		pp.53–54	DOD	What level of detail is wanted by stakeholders? Should dates of service or branch be collected?
Household income	**MINIMUM:** Household income range for aided students **BETTER:** Household income amount for all students (or all FAFSA filers)	SFA	p.48, line 20, to p.49, line 7	FAFSA	How is this collected for non-FAFSA filers?
Living arrangement	**MINIMUM:** For aided students: on campus, off campus with family, off campus without family **BETTER:** For all students (or all FAFSA filers): on campus, off campus with family, off campus without family	SFA	p.48, line 20, to p.49, line 7	Institutions	
POST-COMPLETION OUTCOMES					
Aggregate earnings, by institution and program	**MINIMUM:** Aggregate earnings, by institution and program		pp.53–54	U.S. Census, IRS	What are the time intervals for collection?
Employment	**MINIMUM:** Y/N		pp.53–54	IRS	
Occupation			pp.53–54	U.S. Census	How would this be measured?
Further education	**MINIMUM:** Derived; no collection needed		pp.53–54	Institutions	
INSTITUTION CHARACTERISTICS					
Institution level	**MINIMUM:** Highest postsecondary credential awarded (e.g., 1-year certificate, AA, BA, doctorate)	IC	p.49, line 8, to p.50, line 22	Institutions	

Data Element	Options to Meet Legislation	Current IPEDS Component	Reference in the CAA Legislation	Data Source	Questions
Institution control	**MINIMUM:** Public, private not-for-profit, or private for-profit	IC	p.49, line 8, to p.50, line 22	Institutions	
Predominant degree awarded	**MINIMUM:** Most frequently awarded postsecondary credential (e.g. 1-year certificate, AA, BA, doctorate)	IC	p.49, line 8, to p.50, line 22	Institutions	
Cost of Attendance	**MINIMUM:** Published "Sticker price" of annual full-time enrollment including tuition, fees, room, board, and other expenses **BETTER:** Cost of attendance (tuition, fees, room, board, and other expenses) calculated for each student	SFA	p.48, line 20, to p.49, line 7	Institutions	Can institutions provide information on cost of attendance at the student level?
UNIQUE STUDENT IDENTIFIER					
Student ID	**MINIMUM:** Fuzzy match (using name, date of birth, etc.) **BETTER:** Student ID linked to SSN/TIN			Institutions	Do all schools have SSN/TIN? What information will be needed to create a federal identifier?

C = Completions

CIP = Classification of Instructional Programs

DOD = Department of Defense

EF = Fall enrollment

E12 = 12-month enrollment

ID = Identification number

FAFSA = Free Application for Federal Student Aid

GR = Graduation rates

GR200 = 200% graduation rates

IC = Institution characteristics

IPEDS = Integrated Postsecondary Education Data System

IRS = Internal Revenue Service

NSLDS = National Student Loan Data System

OM = Outcome measures

PAYE = Pay As You Earn

REPAYE = Revised Pay As You Earn

SFA = Student financial aid

SSN = Social Security Number

TA = Tuition Assistance Program

TIN = Taxpayer Identification Number

VBA = Veterans Benefits Administration