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HIGHER EDUCATION

Institutions' Reported Data Collection Burden Is Higher Than Estimated but Can Be Reduced through Increased Coordination



GAO

Accountability * Integrity * Reliability



Highlights of [GAO-10-871](#), a report to congressional committees

Why GAO Did This Study

The Integrated Postsecondary Education Data System (IPEDS) is the federal government's core postsecondary data collection program. Approximately 6,800 postsecondary schools are required to complete annual IPEDS surveys on topics including enrollment, graduation rates, and finances. As policymakers have sought additional data to increase accountability in postsecondary education, the number and complexity of questions on the IPEDS surveys have increased. GAO was mandated to examine: (1) the time and cost burden for schools completing the IPEDS surveys, (2) options for reducing this burden, and (3) the potential benefits and challenges of collecting additional graduation rate data. To do this, GAO interviewed staff from 22 postsecondary schools, reviewed existing estimates of the IPEDS time and cost burden, interviewed officials at the Department of Education (Education) and Office of Management and Budget, and interviewed higher education associations and higher education software providers.

What GAO Recommends

GAO recommends that Education reevaluate official IPEDS burden estimates, communicate IPEDS training opportunities to a wider range of schools, and coordinate with education software providers to help improve the quality and reliability of IPEDS reporting features. Education agreed with GAO's recommendations and plans to address these issues.

[View GAO-10-871](#) or [key components](#). For more information, contact George A. Scott at (202) 512-7215 or scottg@gao.gov.

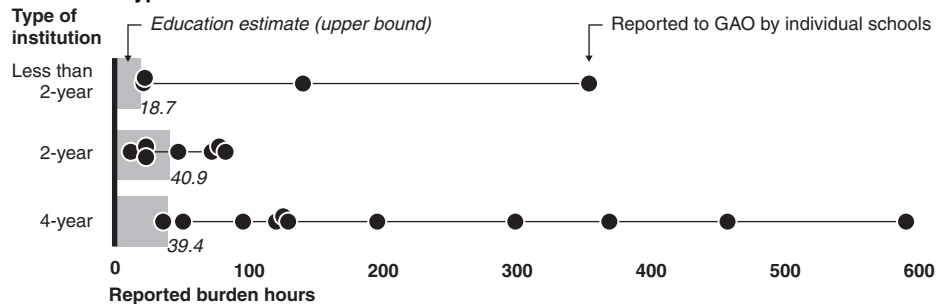
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What GAO Found

The IPEDS burden reported by schools to GAO varies widely but was greater than Education's estimates for 18 of the 22 schools interviewed. Over half of these institutions reported time burdens that were more than twice Education's estimates. Schools reported time burdens ranging from 12 to 590 hours, compared with the 19 to 41 hours Education estimated for this group of institutions (see fig.). Staff experience and school characteristics such as organizational structure appear to affect the burden. Education's official burden estimates may be lower than those reported to GAO because officials rely on potentially outdated baseline estimates and consult with few survey respondents (known as keyholders) about the impact of survey changes.

Time Burdens Reported by 22 Institutions Compared with Education's Official Estimates by Institution Type



Source: GAO analysis of Education documents and interviews.

Training, software, and administrative supports can reduce the IPEDS reporting burden and would be enhanced by increased coordination among institutions, Education, and software providers. Education is developing training modules targeting new keyholders, but some keyholders at career and technical schools are unaware of available training, which may be due to challenges Education faces in reaching these types of schools. Campus data systems may also reduce the burden through automated reporting features; however, few schools GAO interviewed use these features due to concerns that they do not always work correctly. One factor contributing to this is the lack of direct and timely coordination between software providers and Education to incorporate changes to the IPEDS surveys.

Collecting additional graduation rate data disaggregated by race, ethnicity, and income could be useful but would increase the IPEDS burden. Graduation rates could be used to study achievement gaps, but they are a limited measure because they only account for first-time, full-time students. All 4- and 2-year schools are already required to report some graduation rates disaggregated by race and ethnicity to IPEDS, and staff at all types of schools told GAO they could do so at a modest additional burden. Reporting graduation rates by income is more challenging because income data are available only for the 71 percent of full-time students that apply for federal student aid. Keyholders said calculating graduation rates by income for these students would add a considerable burden by potentially requiring institutions to merge separate student records and financial aid databases.

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Abbreviations

| | |
|-----------|--|
| Education | Department of Education |
| FAFSA | Free Application for Federal Student Aid |
| IPEDS | Integrated Postsecondary Education Data System |
| NCES | National Center for Education Statistics |

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United States Government Accountability Office
Washington, DC 20548

August 13, 2010

The Honorable Tom Harkin
Chairman
The Honorable Michael B. Enzi
Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate

The Honorable George Miller
Chairman
The Honorable John P. Kline
Ranking Member
Committee on Education and Labor
House of Representatives

The Integrated Postsecondary Education Data System (IPEDS) is the federal government's core postsecondary data collection program. Every college, university, and career and technical institution that participates in federal student financial aid programs is required to complete this group of annual surveys on a variety of topics including enrollments, graduation rates, staffing, finances, and financial aid.¹ The National Center for Education Statistics (NCES) at the Department of Education (Education) compiles these survey data from approximately 6,800 institutions and uses them to research trends in postsecondary education and inform policy decisions. The data are made publicly available to allow researchers and federal and state agencies to analyze higher education issues and help students and parents make informed choices about postsecondary educational opportunities.

Over the last several years, Education has increased the number and complexity of questions on the IPEDS surveys as policymakers have sought additional data in an effort to increase transparency and accountability in postsecondary education. For example, additional questions about institutions' graduation rates were added to the survey in

¹20 U.S.C. § 1094(a)(17). IPEDS was initiated in 1986 and replaced several surveys that collected similar information. IPEDS has been conducted through a Web-based system since 2000.

2009.² However, the expansion of the surveys has raised questions about the burden the surveys impose on participating institutions. As required under the Paperwork Reduction Act,³ Education estimates the time and cost burden associated with completing the surveys. For the 2009-2010 reporting cycle, Education estimated an average IPEDS time burden ranging from 15 to 41 hours, depending on the type of institution, and total estimated salaries and computer costs of over \$6 million. However, several postsecondary institutions and associations have noted that these projections substantially underestimate the actual survey burden. Moreover, certain types of institutions, such as community colleges and technical schools, are dealing with more data due to the jump in their enrollments as a result of current economic conditions. In this context, Congress mandated in the Higher Education Opportunity Act that GAO study the time and cost burdens on institutions of completing the IPEDS surveys.⁴ Accordingly, we examined the following questions:

- What is known about the time and cost burden of completing the IPEDS surveys for postsecondary institutions?
- What options exist for reducing this burden for these institutions?
- What are the potential benefits and challenges of collecting additional data on institutions' graduation rates?

To understand the time and cost burden of completing the IPEDS surveys, we interviewed institution staff from 22 postsecondary institutions who are responsible for entering data into the IPEDS surveys and are known as keyholders. This nonprobability sample of 22 institutions represented a mix of 4-year, 2-year, and less than 2-year institutions, as well as public, not-for-profit, and for-profit (proprietary) institutions in different geographic areas of the country. While limiting our sample to 22 schools precluded us from generalizing our findings to the entire population of about 6,800 postsecondary schools that complete IPEDS, our approach allowed us to conduct detailed, in-person interviews with keyholders and

²Institutions were required to collect graduation rate data under the Student Right-to-Know and Campus Security Act to increase information about institutions to students and parents. Pub. L. No. 101-542, § 103(a), 104 Stat. 2381, 2381-84. Education added the Graduation Rates Survey to IPEDS in 1997 to help institutions satisfy these requirements.

³44 U.S.C. § 3506(c)(1)(B)(iii)(III).

⁴Pub. L. No. 110-315, § 1103, 122 Stat. 3078, 3492-93.

relevant staff without substantially burdening the schools. We also reviewed existing estimates of the IPEDS time and cost burden and interviewed officials from Education and the Office of Management and Budget about the methodology and assumptions used to create Education's official burden estimates. To examine options for reducing the IPEDS reporting burden, we interviewed Education officials, higher education associations, higher education software providers, and keyholders. To assess the potential benefits and challenges of collecting additional data on graduation rates, we interviewed keyholders as well as researchers and Education officials.

We conducted this performance audit from August 2009 to August 2010, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. For more information on our objectives, scope, and methodology, see appendix I.

Background

Estimating the Burden of Federal Information Collections

To better manage the federal government's imposition on the public with information collections, the Paperwork Reduction Act requires federal agencies like Education to estimate the burden, or the amount of time, effort, and financial resources that the public expends to comply with an agency's information collection.⁵ The time burden is generally measured as the amount of time it takes respondents to review instructions, search data sources, complete and review their responses, and transmit or disclose information. Agencies inform the person receiving the collection of information of the estimated time burden of the collection, which helps respondents plan for how long the collection will take to complete.

The Office of Information and Regulatory Affairs, within the Office of Management and Budget, was created by the Paperwork Reduction Act to approve information collections subject to the Paperwork Reduction Act, which are generally all those collecting information from 10 or more

⁵44 U.S.C. § 3506(c)(1)(B)(iii)(III).

respondents.⁶ The Office of Information and Regulatory Affairs weighs the value to society of collecting the data against the burden imposed by collecting them to approve or deny information collection requests. Once a collection has been approved, the agency may carry out the information collection for 3 years or until there are substantial changes to the collection, at which time the Office of Information and Regulatory Affairs requests that agencies revise their estimates.

IPEDS

IPEDS is a set of surveys completed annually by institutions of higher education in the United States since 1986. It is the successor to the Higher Education General Information Survey, which collected information on postsecondary institutions from 1966 to 1985. About 6,800 institutions completed IPEDS surveys in academic year 2008-2009. Institutions are required to report IPEDS data or face a fine as high as \$27,500 per violation and lose their eligibility for federal student financial aid. IPEDS collects information on institutions and their students and is composed of nine surveys administered throughout the year.⁷ IPEDS collects information on institutional characteristics, degrees earned, finance, human resources, enrollment, graduation rates, and financial aid, as illustrated in table 1. Institutions report data on either the current or prior years depending on the survey.

⁶44 U.S.C. §§ 3503(a) and 3502(3), respectively.

⁷Some of the nine IPEDS surveys have more than one form associated with them to account for different school characteristics. For example, nonprofit, for-profit, and public schools all complete different Finance Survey forms, each with a different time burden estimate associated with them. Education estimates the time burden for each separate form. The total time Education estimates it takes institutions to complete IPEDS is equal to the sum of the time-burden estimates on all the survey forms applicable to an institution.

Table 1: IPEDS Survey Components and Collection Period

| Collection period | Survey | Description of survey content |
|----------------------------|---|---|
| Fall September-October | Institutional Characteristics | General information on the institution such as degrees offered, admission requirements, and tuition. |
| | Completions | Degrees conferred by field of study. |
| | 12-Month Enrollment | Unduplicated count of all enrolled students for the prior year by gender, and race/ethnicity. |
| Winter December-January | Human Resources | Institutional staff by full-time or part-time, assigned position, salary, gender, and race/ethnicity. |
| Spring December-April | Fall Enrollment | Fall student enrollment by level of study, part-time or full-time, gender, and race/ethnicity. |
| | Finance | Financial data on assets, liabilities, revenues, and expenses. |
| | Student Financial Aid | Average financial aid amounts and percentages of students receiving various types of assistance. |
| | Graduation Rates Graduation Rates 200 ^a | Percentages of first-time, full-time students who graduate within specific time periods. |

Source: Education.

^aIPEDS collects graduation rates through two separate surveys, the Graduation Rates and Graduation Rates 200 Surveys, which use different cohorts of students as the basis for the calculations.

Much of the information IPEDS collects from postsecondary institutions is required by federal laws. For example, reporting student racial and ethnic data is done in implementation of the Civil Rights Act of 1964,⁸ and the data on vocational program completions were added due to a requirement in the Carl D. Perkins Vocational Education Act.⁹ Due to new statutory requirements and design changes, the content and format of IPEDS has changed many times throughout its history.

IPEDS Data Collection Process

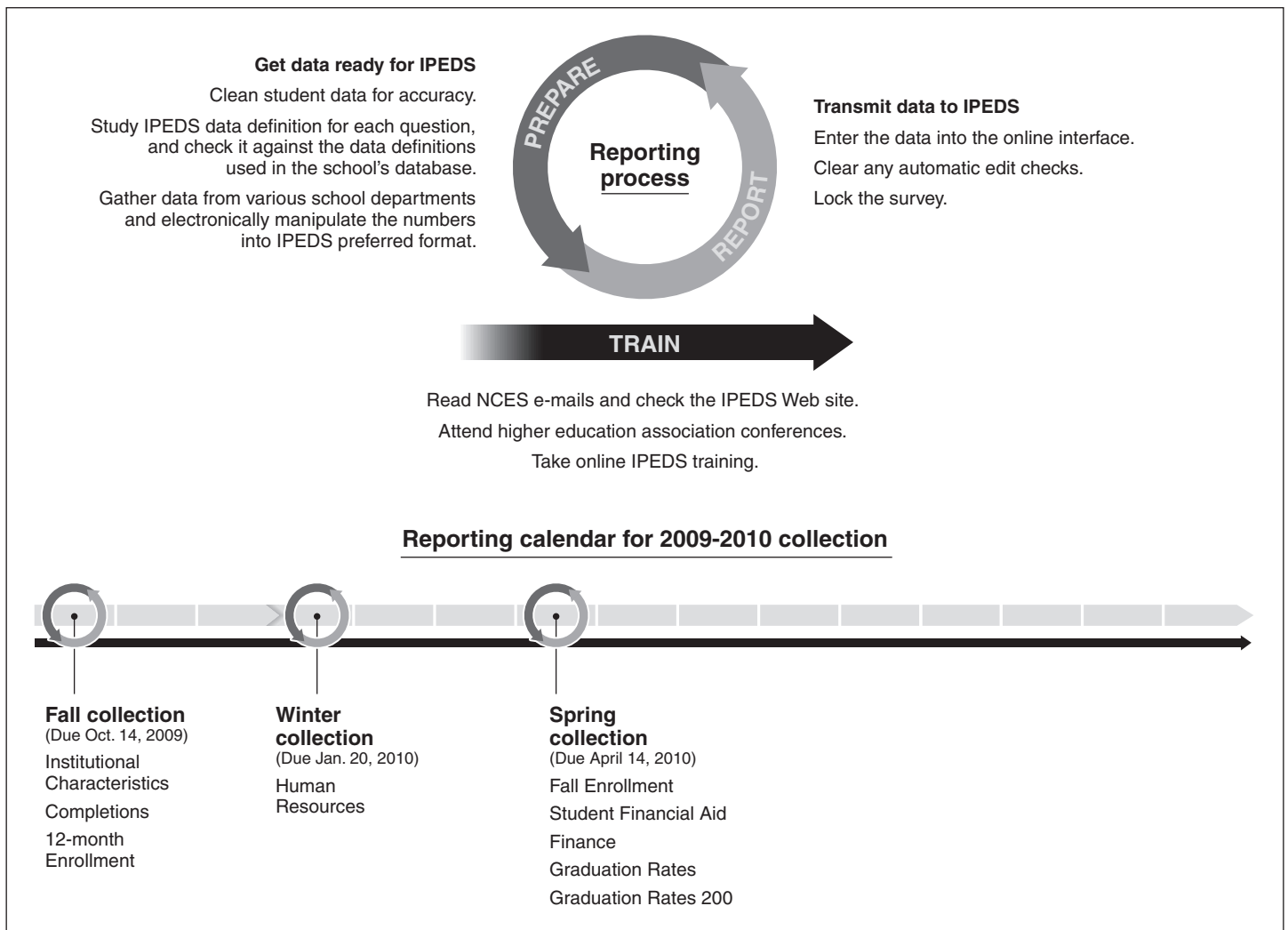
NCES contracts with RTI International, a nonprofit organization that provides research and technical expertise to governments and businesses, to administer the IPEDS surveys. RTI International uses an online survey

⁸Pub. L. No. 88-352, 78 Stat. 241.

⁹Pub. L. No. 98-524, § 421, 98 Stat. 2435, 2472-73.

instrument to collect and validate IPEDS data from institutions. At the institutional level, one individual is designated the “keyholder,” and has the authority to “lock” the institution’s data for a given survey, signaling to RTI International that it is complete. The keyholder may be someone in the school’s institutional research office or especially in small institutions, may be the institution’s general manager. The keyholder will work with other individuals and offices in his or her institution as necessary to collect and report the institutional data. In addition to reviewing the data submitted by the keyholders, an IPEDS state coordinator can also help coordinate reporting activities for a specified group of schools within a state. Figure 1 illustrates the general process for collecting and reporting IPEDS data.

Figure 1: The IPEDS Reporting Process



Source: GAO analysis of Education documents and interviews.

The IPEDS survey online interface runs several automated checks of the data before keyholders are able to lock and submit any data. This review, known as edit checks, compares certain questions against data from other questions or previous years. These edit checks help improve the reliability of the data by flagging inconsistencies.

RTI also provides additional services to support the IPEDS reporting process. It runs a help desk from which many institutions receive guidance

on completing surveys. In addition, RTI maintains a Technical Review Panel of IPEDS experts that it convenes multiple times every year to discuss related issues. This panel consists of individuals representing the federal government, state government, institutions, data users, and higher education associations.

IPEDS Graduation Rates

The IPEDS Graduation Rates Survey collects data from institutions in accordance with the Student Right-to-Know and Campus Security Act of 1990.¹⁰ The measure, as defined in statute, is based on the number of full-time, first-time, degree/certificate-seeking, undergraduate students entering an institution in a particular year that end up completing their programs within certain time periods. Part-time and transfer-in students are excluded from the calculation. Graduation rates are calculated at several points once a cohort of students enrolls, but the most widely cited rates are based on the number of students who completed their program within 150 percent of normal time, or 6 years for a 4-year bachelor's degree.¹¹ For example, the most recent Graduation Rates Survey required 4-year institutions to report on the percentage of students that originally enrolled in fall 2003 that had graduated as of August 31, 2009.¹² These graduation rates are reported by gender or race and ethnicity depending on the reporting requirements for each type of institution.

The Graduation Rates Survey also collects transfer-out rates from institutions whose missions include providing substantial preparation for students to enroll in another eligible institution without having completed their program. A school is required to report only on those students that the school knows have transferred to another school. Transfer-out rates are reported separately from a school's graduation rates.

¹⁰Pub. L. No. 101-542, § 103(a), 104 Stat. 2381, 2381-84.

¹¹The Graduation Rates Survey requires less than 2-year and 2-year institutions to report on the number of full-time, first-time, degree/certificate-seeking students that complete within 100 percent and 150 percent normal time. Four-year institutions are required to report on the number of full-time, first-time, bachelor's or equivalent degree-seeking students that complete in 4 years, 5 years, and 6 years (100, 125, and 150 percent normal completion time).

¹²Institutions are only allowed to remove students from an initial cohort if they left the institution for one of the following reasons: death or total and permanent disability; service in the armed forces (including those called to active duty); service with a foreign aid service of the federal government, such as the Peace Corps; or service on official church missions.

In 2009, the Graduation Rates 200 Survey was added to the IPEDS spring collection cycle for all institutions in order to comply with requirements added by the Higher Education Opportunity Act.¹³ The Graduation Rates 200 Survey uses full-time, first-time, degree/certificate-seeking student cohorts like the original Graduation Rates Survey, but tracks students for the longer period of 200 percent of normal completion time. For example, the most recent Graduation Rates 200 Survey required 4-year institutions to report on the number of first-time, full-time students that originally enrolled in fall 2001 and had graduated as of August 31, 2009.

Value of IPEDS data

IPEDS data are used by government agencies, postsecondary institutions, businesses, and citizens for a variety of research and policy purposes. The general consensus among Education officials and higher education experts we interviewed was that IPEDS provides the public with essential information on the nation's higher education system. It is a premier source for higher education data. Some of the uses of IPEDS data are depicted in table 2.

Table 2: Uses of IPEDS data

| User of IPEDS data | Examples of use |
|----------------------------|---|
| Education | <ul style="list-style-type: none"> • Inform budgetary and policy decisions • Determine institutions' eligibility for grants • Identify samples for other postsecondary surveys |
| Parents and students | <ul style="list-style-type: none"> • Compare tuition, academic programs, and financial aid when selecting a school to attend |
| Researchers | <ul style="list-style-type: none"> • Track trends in enrollment, completions, and costs |
| Postsecondary institutions | <ul style="list-style-type: none"> • Inform internal decision making • Compare salaries and tuition at peer institutions |
| Private-sector businesses | <ul style="list-style-type: none"> • Identify locations of skilled graduates |
| Other federal agencies | <ul style="list-style-type: none"> • Plan recruitment activities • Project future labor supply and demand |
| State government | <ul style="list-style-type: none"> • Inform budgetary and legislative decisions |

Source: Education.

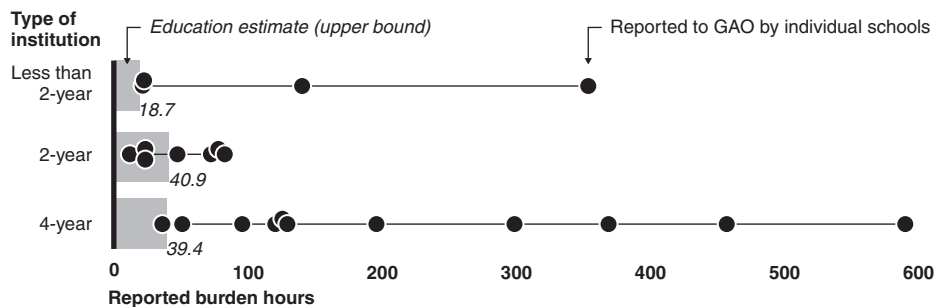
¹³20 U.S.C. § 1092(a)(7)(A).

Schools' Reported IPEDS Burdens Exceed Official Estimates, and Education Lacks a Robust Process for Estimating the Burden

Institutions' Reported Burdens Substantially Exceed Education's Estimates

The IPEDS burden reported by many schools in our sample exceeds Education's official estimates, often to a substantial degree. The time burdens schools reported were greater than Education's official estimates for 18 of the 22 schools in our sample. Twelve schools reported burdens more than twice Education's estimates. As illustrated in figure 2, schools reported time burdens ranging from 12 to 590 hours, compared with the 19 to 41 hours Education estimated for these 22 institutions.

Figure 2: Time Burdens Reported by 22 Institutions Compared with Education's Official Estimates by Institution Type



Source: GAO analysis of Education documents and interviews.

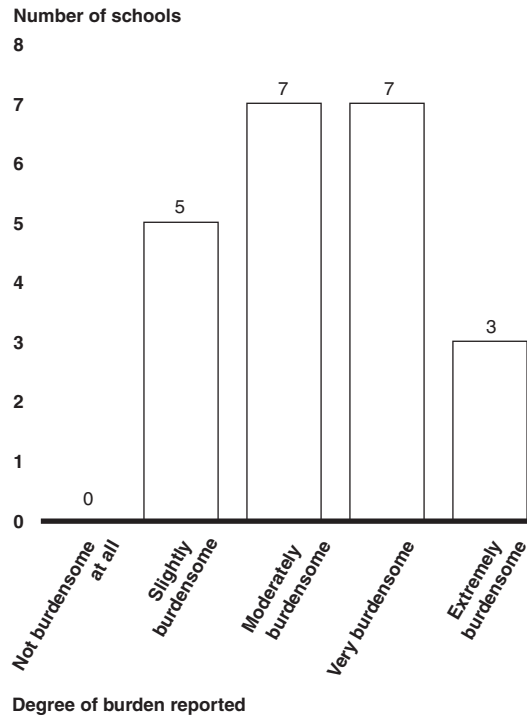
The high burdens relative to Education's estimates reported by schools in our sample are corroborated by the findings of a recent internal NCES study that examined the burden at nine institutions. The NCES study found the burden reported by all nine institutions to be much higher than Education estimated. Eight of these institutions reported burdens more than twice Education's estimates. In addition, 40 higher education associations representing a wide range of institutions signed a letter to the

Office of Management and Budget in March 2007 commenting that Education's official IPEDS time burdens were serious underestimates.

In addition to being time-consuming, keyholders generally perceive IPEDS reporting to be a relatively demanding task. The majority of keyholders we interviewed told us IPEDS is either moderately or very burdensome and is more burdensome than their other external reports.¹⁴ However, the amount of time keyholders reportedly spent completing IPEDS did not always correspond with their subjective attitudes on the level of burden. Figure 3 illustrates keyholders' attitudes toward IPEDS. For example, the keyholder at a large institution that reportedly spent over 350 hours completing IPEDS said the surveys were only slightly burdensome, while the keyholder at a small institution that reportedly spent less than 25 hours said the surveys were extremely burdensome. These discrepancies may be due to differences between keyholders' evaluation of burden, a complex and subjective concept, which might include the perceived value of IPEDS data and institutional reporting, and the level of effort and difficulty reporting might require.

¹⁴Keyholders were asked to consider the amount of time they spend on IPEDS reporting, the time frame they have to do that work in, any difficulty they have in collecting or submitting IPEDS data, and the overall level of effort IPEDS reporting requires, and then rank the IPEDS burden using a scale from 1 to 5: (1) not at all burdensome, (2) slightly burdensome, (3) moderately burdensome, (4) very burdensome, (5) extremely burdensome.

Figure 3: Frequency School Officials Reported Feeling Various Degrees of Burdens from IPEDS



Source: GAO analysis of interview results.

In part, because there is some overlap among all the reporting that schools do, it was challenging for school officials to estimate the time they spent exclusively on IPEDS. For example, one of our selected schools produced a large package of data that the statewide central office used to fulfill the school's multiple reporting requirements, including state reporting and IPEDS. Since the institution was submitting data for multiple purposes, it was hard to identify the time spent compiling data for IPEDS rather than other reporting requirements. However, some school officials commented that some of the data they compile to report to IPEDS is useful to have when fulfilling other reporting requirements and, as a result, may reduce their burden for other reporting requirements. Individuals mentioned state reporting, reporting for accreditation, and reporting to college ranking publications as the main other reporting requirements they had to fulfill. The majority of keyholders we interviewed reported IPEDS to be more burdensome than any other external reporting. For example, one keyholder said that while accreditation and state reports are only due once a year, IPEDS surveys are due three times a year.

Since most schools in our sample reported time burdens higher than Education estimated, the cost burden of IPEDS reporting may also be more than Education estimated for those schools. The cost burden of IPEDS reporting is determined almost entirely by staff time. Education calculates the cost of IPEDS reporting at a constant rate of \$30 per hour, which is based on an average clerical salary and associated computer costs for running programs to extract data. Only one of the schools we interviewed had additional IPEDS-related expenses, which was the cost of a contractor who completed its IPEDS Finance Survey.

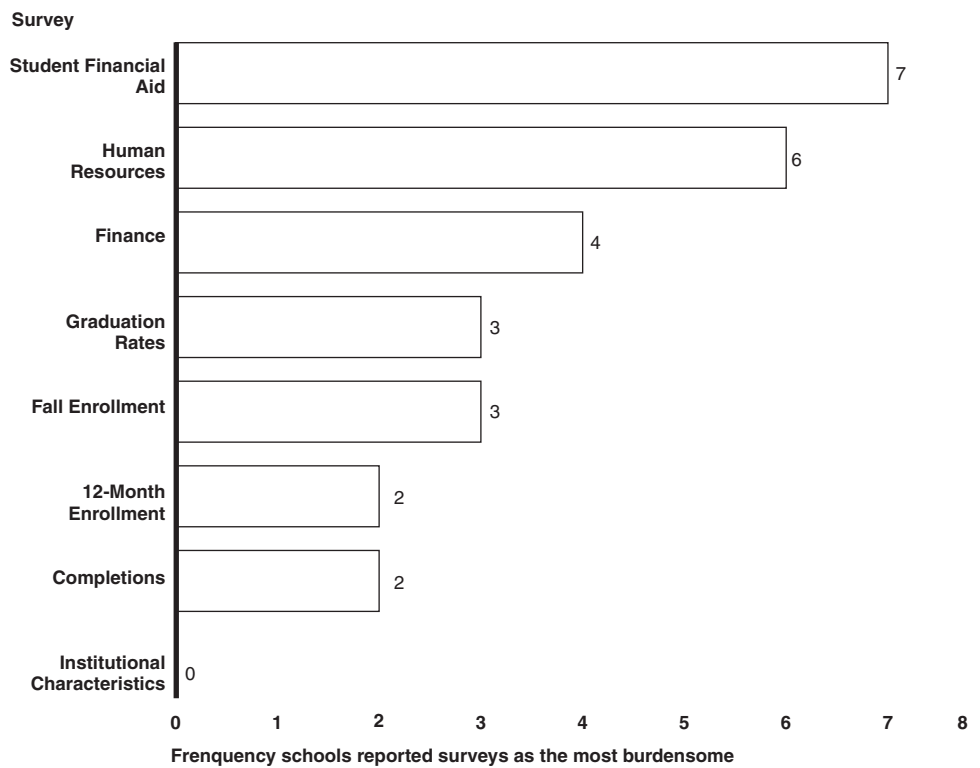
Staff Experience and School Characteristics Greatly Influence the IPEDS Burden Reported

Staff experience and school characteristics are strong determinants of the IPEDS burden. The majority of schools indicated that keyholder experience, respondents' technical skills, organizational structure, and institutional size were either moderately or extremely important in determining the time burden of IPEDS reporting.

- *Keyholder experience*—The burden of completing the IPEDS surveys generally declines as the keyholder becomes more familiar with the reporting process, according to keyholders we interviewed. The first year is generally the hardest because keyholders have to learn the IPEDS data definitions and find the corresponding information in their internal databases. For example, one keyholder said that the first time he reported IPEDS data it took him twice the time it takes him now. The school reporting the highest burden in our sample also had a new keyholder. This school had recently undergone significant staff turnover, so there was no institutional knowledge for the keyholder to draw on while sifting through the school's data systems searching for the appropriate data to report to IPEDS.
- *Technical skills*—The efficiency with which staff can operate software and work with data affects a school's IPEDS reporting burden. Cleaning, manipulating, and double checking a school's data to produce the information IPEDS requires can be a time-consuming process, and every school reported spending time on such work. These tasks are often easier if keyholders have the technical skills to design computer programs for sorting and calculating the data. For example, the keyholder at a large community college was able to quickly process large data files for the IPEDS Enrollment Survey because he had advanced statistical programming skills.
- *Organizational structure*—It can be more burdensome to complete IPEDS surveys when keyholders have to collaborate with other offices at an institution to get the necessary information. In most institutions in our

sample, the keyholder had to collaborate with other individuals in the school to report Human Resources, Student Financial Aid, and Finance data to IPEDS. As illustrated in figure 4, schools frequently reported these surveys to be the most burdensome. Such collaboration sometimes entailed meetings between the keyholder and these other stakeholders because the keyholder may not have access to the data (e.g., payroll information for the Human Resource Survey) or does not have subject matter expertise (e.g., accounting knowledge for the Finance Survey). While the survey content may be more complex than that of other surveys, meetings also expand the burden by requiring the time of multiple individuals simultaneously. This necessary collaboration makes it important for keyholders to establish effective working relationships with other institutional offices.

Figure 4: Frequency with Which Each Survey Was Rated the Most Burdensome by 22 Institutions



Source: GAO analysis of interview results.

Note: Some schools gave more than one survey the same burden rating, in some cases resulting in more than one “most burdensome” survey per school.

-
- *Institution size*—The size of an institution can have both positive and negative effects on the reporting burden. The 22 schools in our sample had enrollments ranging from less than 60 to more than 40,000 students. IPEDS reporting can sometimes be more time-consuming for large institutions since there are more students and staff to report on. However, larger institutions in our sample did not always have higher burdens than their smaller counterparts, potentially because large schools generally have more specialized staff than small schools. The large schools we visited had institutional research offices with full-time staff dedicated to regularly collecting, analyzing, and reporting information on the institution for management and planning purposes. At those smaller institutions, generally the keyholder was a high-level school administrator for which institutional reporting was a minor aspect of his or her responsibilities. Among the keyholders in our sample were two Directors and two Presidents. Keyholders we interviewed at smaller schools might also handle the school’s finances and payroll, as well as teach classes when teachers are absent. Compared with full-time institutional research professionals at larger schools, these staff may have less sophisticated IT skills or expertise in working with institutional data so IPEDS reporting may be more time-consuming even though they have small numbers of students and staff to report on.

Education Does Not Have a Robust Process for Estimating Time and Cost Burden

Education’s official burden estimates may be lower than those reported to us because officials are still using the potentially unreliable original baseline burden estimates for current burden calculations. Education officials we spoke to attempted but were unable to ascertain whether any systematic methodology was used to develop the original baseline burden estimates. Officials said the original baseline was developed in the late 1980s or early 1990s, and that some members of the IPEDS Technical Review Panel were consulted at that time. They did not know of any other steps taken to determine whether the burden estimates were ever accurate. Every 3 years or when there are substantial changes, as a requirement of the approval of the IPEDS information collection request by the Office of Management and Budget, Education updates its estimates of the burden imposed by each survey form by taking into account changes to the survey or its administration. For example, when it became possible to complete and submit IPEDS surveys through the Web, Education lowered the burden estimates. Education also publishes a notice in the Federal Register to solicit public comments on new burden estimates. Office of Management and Budget officials told us they do not independently verify the accuracy of Education’s burden estimates.

Education officials said the impact of survey changes on the burden is estimated through ratio adjustments made relative to the baseline estimates. For example, if the baseline estimate is 5 hours for a survey form, and 20 percent of the questions on that survey are removed, Education might estimate the new burden of that survey to be 4 hours. Before finalizing and submitting revised estimates to the Office of Management and Budget for changes to required race and ethnicity reporting, officials said they spoke with two schools in addition to consulting with the IPEDS Technical Review Panel for an indication of the impact the changes would have on the reporting burden. If the wide variation of reported burdens in our sample is indicative of the general population of institutions, it would be difficult for Education to get a reliable assessment of the burden by consulting with as few as two institutions.

Accurately estimating the IPEDS reporting burden is challenging, but other federal agencies use methodologies that can serve as examples for NCES. Currently burden estimates are associated with the survey forms an institution completes; however, the characteristics of institutions in our sample influenced their reported burdens as much or more than the forms they completed. As we have previously reported, burden-hour estimates are not a simple matter.¹⁵ It is challenging to estimate the amount of time it will take for a respondent to collect and provide information, particularly when there is a high degree of variability like we found in our sample of institutions. In addition, like all estimates, burden estimates are not precise. Despite these challenges, at least one other federal agency has developed a more systematic methodology for estimating the reporting burden. We have previously reported on the statistical model the Internal Revenue Service uses to improve the accuracy and transparency of taxpayer burden estimates.¹⁶ According to the Office of Management and Budget, rather than estimating burden on a form-by-form basis, the Internal Revenue Service's methodology takes into account broader and more comprehensive taxpayer characteristics and activities, considering how the taxpayer prepares the return (e.g., with or without software or a paid preparer), as well as the taxpayer's activities, such as gathering tax materials, completing forms, recordkeeping, and tax planning. NCES officials told us they are planning to examine the information collections

¹⁵GAO, *Paperwork Reduction Act: Increase in Estimated Burden Hours Highlights Need for New Approach*, [GAO-06-974T](#) (Washington, D.C.: July 18, 2006).

¹⁶[GAO-06-974T](#).

of other federal agencies to learn about the methodologies they use for establishing reporting burden estimates. Any methodology NCES uses to estimate the IPEDS burden will still have limitations, but there appears to be substantial room for improvement over the current estimates. Without reliable burden estimates, policymakers will not be able to effectively weigh the benefits of IPEDS against the costs it imposes on institutions.

Training, Software, and Administrative Supports Can Reduce the IPEDS Burden and Would Be Enhanced by Increased Coordination

Expanding Training Could Reduce the Burden, but Some Keyholders Are Not Aware of Current Training Opportunities

According to NCES officials and institutional keyholders we interviewed, expanding training could reduce the IPEDS reporting burden at certain schools, but some keyholders are not aware of current training opportunities. The Paperwork Reduction Act requires agencies to reduce, to the extent practicable and appropriate, the burden to respondents.¹⁷ Training is one way to achieve this goal, according to institutional research experts we interviewed. NCES currently offers in-person and online training on topics such as leading or managing an IPEDS cycle and step-by-step guidance for completing each IPEDS survey.¹⁸ NCES plans to expand its current training options and is developing a training module targeting new keyholders. New or inexperienced keyholders may face increased reporting burdens because they are less familiar with the IPEDS reporting process, according to keyholders, Education officials, and higher education associations we interviewed. To address this, NCES's proposed new keyholder training module and resources will include the following:

¹⁷44 U.S.C. § 3506(c)(3)(C).

¹⁸NCES offers keyholder training under contract through the Association of Institutional Research.

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- Communications directly targeted to new keyholders through a welcome e-mail and phased e-mails outlining opportunities for training.
 - Welcome packets specifically for new keyholders, which would include training schedules and calendars to help keyholders keep track of key dates.
 - A new keyholder manual containing information on the importance of data quality, keyholder responsibilities, and tips from veteran keyholders.
 - A new in-person workshop for new keyholders, supplemented by online tutorials.
 - Enlisting state IPEDS coordinators to help target communications to new keyholders.

Current training opportunities are not being effectively communicated to all institutions, according to NCES officials and keyholders we interviewed. Keyholders at five schools in our sample were unaware of currently available training resources. Not all keyholders may be aware of currently available training resources due to challenges NCES faces in reaching career and technical schools. Of the five schools in our sample that were not aware of training options, three keyholders represented career and technical schools. According to NCES officials, reaching these types of schools is particularly challenging because they do not generally participate in the channels NCES uses to communicate with keyholders. NCES communicates with keyholders primarily through e-mails and through their connections with national higher education associations and networks. For example, NCES e-mails all keyholders periodic newsletters titled, "This Week in IPEDS," that include details about training opportunities. Even though all keyholders presumably receive these e-mails, the long length of NCES e-mails may cause some keyholders to ignore them, according to members of the IPEDS Technical Review Panel. NCES also offers an optional e-mail listserv that keyholders and others can subscribe to and discuss IPEDS-related questions and topics, but very few career and technical schools have joined this listserv. NCES works with one higher education association that represents career and technical, proprietary schools, but many of these schools do not participate in any national associations. Without receiving effective communications about training resources that can increase their skills and knowledge, keyholders at these schools may face larger time burdens completing the surveys and risk missing reporting deadlines or reporting inaccurate data.

Campus Data Systems Include Automated IPEDS Reporting Tools That Could Reduce the Burden, but Keyholders Are Concerned About Their Reliability

Campus data systems could reduce the IPEDS reporting burden, but some keyholders we interviewed are concerned about the reliability of the systems' automated IPEDS reporting features. Some schools develop their own internal data systems, while other schools purchase campus data systems primarily to manage a wide range of campus business functions, such as student records, financial aid, human resources, and finance. To assist keyholders with IPEDS reporting, many campus data systems can extract data from schoolwide databases and create reports that schools can use to complete IPEDS surveys. Some features produce electronic data files that can be uploaded directly into IPEDS, saving keyholders time from entering data manually into IPEDS.

However, some keyholders do not use the IPEDS reporting functions available in their campus data systems to complete IPEDS surveys due to concerns about their reliability. Keyholders at 12 schools we interviewed used software programs that included IPEDS reporting functions. Among these 12 schools, 9 keyholders did not use these functions for IPEDS reporting. Keyholders cited concerns with the data produced by these functions as one reason for not using them. For example, keyholders at four schools felt more comfortable with their own calculations because they were concerned that the data produced from these features may not be correct. Specifically, two keyholders stated that the data produced from these features were unreliable. A NCES-funded study of campuswide reporting software also found that most keyholders surveyed do not use these reporting functions to gather data needed for IPEDS.¹⁹ The keyholders surveyed in this study did not use these functions because they were unsure of the results produced and because the functions did not align with recent changes to IPEDS.

One contributing factor to the limitations of these automated reporting features is the lack of direct and timely coordination between campus data system software providers and Education to incorporate upcoming changes to the IPEDS surveys. Although Education is not responsible for developing these IPEDS reporting functions, NCES is mandated to assist institutions in improving and automating statistical and data collection activities.²⁰ Many schools use campus data systems with these features to manage other campus functions, but keyholders are reluctant to use these

¹⁹Crissie M. Grove, "Features of Campus Data Systems and Reporting to IPEDS" (July 2009), www.airweb.org/images/Grove_Final_Report_2010.pdf.

²⁰20 U.S.C. § 9543(a)(4).

systems' IPEDS reporting features because of their concerns about the performance of these features. Improving the reliability of these reporting functions could encourage keyholders to use these features, which could help keyholders reduce their IPEDS reporting burden. Without direct and frequent coordination with Education, software providers risk misinterpreting reporting requirements and do not have time to fully test automated IPEDS features before their release to schools. All four major higher education software providers we interviewed indicated they have limited or no direct coordination with Education to learn about upcoming changes to IPEDS. These companies instead rely on alternative means such as communications from their client schools, attending conferences, or checking the IPEDS Web site. According to these companies, these means are less effective than direct contact with NCES. Software providers may not fully understand certain IPEDS reporting requirements, according to one expert, which may further affect software providers' timelines to fully test their updates. Two software providers we interviewed indicated that it was challenging to deliver timely updates to IPEDS features because they did not receive information about upcoming changes in IPEDS early enough. According to one software provider, the company was not able to fully test the updated automated IPEDS reporting functions, and it was unclear if the functions were going to work properly upon their release to clients. If IPEDS reporting functions are not always fully tested, they may not align with reporting requirements. This deters keyholders from using tools that could potentially reduce their burden or may negatively affect the reported data. The software providers we spoke with cited examples of coordination with Education that could be expanded or replicated with regard to IPEDS. For example, Education holds an annual conference on student financial aid that some software providers attend to stay up-to-date on changing eligibility rules. This conference includes sessions on reporting student financial aid data to IPEDS but does not address other IPEDS surveys. Education also works with the Postsecondary Electronic Standards Council, an association which includes software providers, colleges and universities, and state and federal government agencies.

Respondents Are Generally Pleased with Components of Survey Administration That Help Reduce the Reporting Burden

Keyholders we interviewed are generally pleased with current components of the IPEDS surveys' administration that help reduce the reporting burden. They cited several components of the surveys' administration that have been particularly effective at reducing the burden:

- *IPEDS Help Desk*—Nearly all keyholders we interviewed reported high levels of satisfaction with the IPEDS Help Desk in resolving difficulties

they had with completing the surveys. The IPEDS Help Desk is a call center that NCES operates to assist keyholders with completing the IPEDS surveys.²¹ Keyholders have contacted the Help Desk for assistance on a range of issues, including recovering a lost password, clarifying data definitions, and clearing problems found in the data before the surveys are locked.

- *Survey instructions*—Both new and experienced keyholders in our sample reported that the instructions were sufficient and helpful in completing the IPEDS surveys. For example, one new keyholder referred to the instructions to learn how to report data, while another experienced keyholder reviewed them periodically to learn about reporting changes.
- *Collection schedule*—Keyholders in our sample are generally satisfied with the three-phase data collection schedule of IPEDS surveys. The IPEDS surveys are collected during the fall, winter, and spring reporting periods, distributing the survey burden throughout the academic year. Some keyholders, however, indicated that they would like the survey deadlines extended or to open earlier to provide keyholders additional time.

Additionally, Education has modified IPEDS survey forms to lower the reporting burden on nondegree-granting schools. For example, the survey forms for nondegree-granting institutions do not include standard questions about student charges for room and board since these schools do not typically offer these services. Several data elements in the Finance Survey for both proprietary and not-for-profit nondegree-granting schools have also been eliminated to reduce the reporting burden for these schools. Education also recently hosted an IPEDS Technical Review Panel to discuss new tools and resources it is developing for reducing the IPEDS burden. Education presented several new initiatives to the panel that are intended to reduce institutions' reporting burden. These included training for new keyholders, which we previously discussed, and an aggregation tool that could help schools convert their student data into a file that can be uploaded to the IPEDS data collection system.

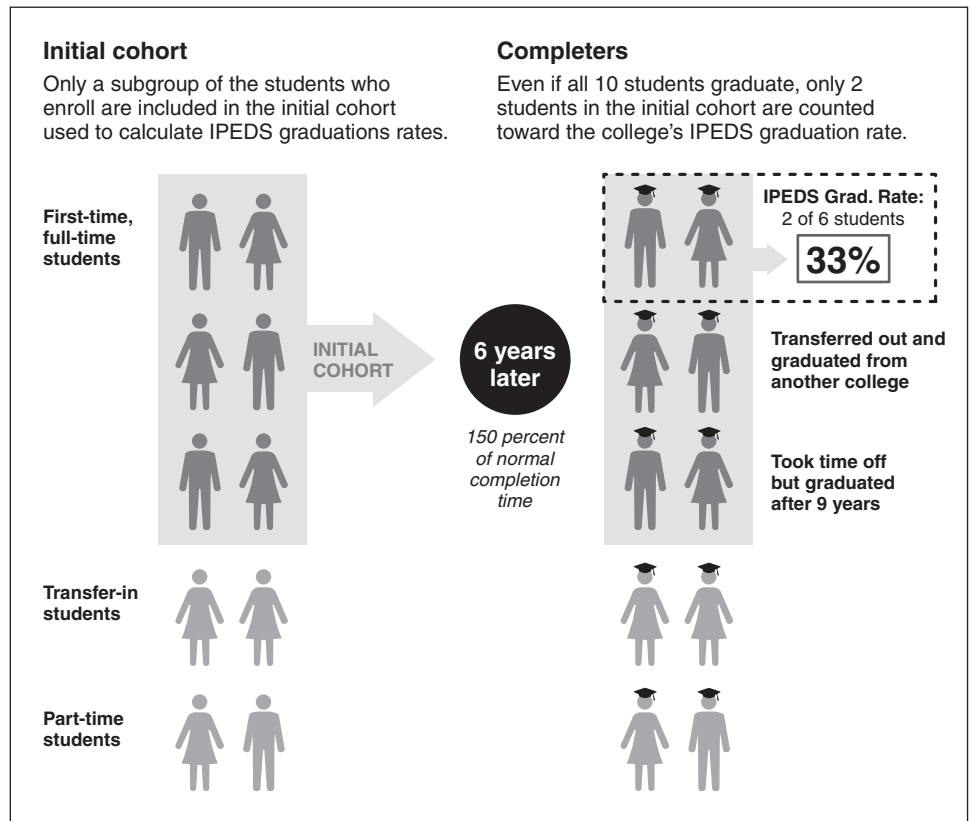
²¹NCES has contracted with RTI International to administer the IPEDS Help Desk.

Additional Graduation Rate Data, Although of Some Use, Is an Incomplete Measure of Student Outcomes and Would Add to Schools' Burden

IPEDS Graduation Rates Only Account for a Subset of Students, but Additional Data Could Be Useful to Researchers and Students

IPEDS graduation rates are a limited measure because they only track outcomes for a subset of students. IPEDS graduation rates only measure the outcomes for first-time, full-time, degree/certificate seeking students, which comprise 49 percent of entering students nationwide according to IPEDS data. Students who attend part-time or transfer-in are not counted toward a school's graduation rate. All nongraduates are treated as dropouts, even if they go on to graduate from another institution. Figure 5 illustrates how certain types of students are counted by the measure:

Figure 5: Hypothetical Graduation Rate Calculation Example for 4-Year Institution



Source: GAO analysis of Education documents.

Since many students are excluded from the IPEDS graduation rate calculation, it is an incomplete measure of student outcomes. According to Education, the consensus is that IPEDS graduation rates in their present form are an inadequate measure for school accountability. The IPEDS graduation rate measure is less effective at institutions that serve large proportions of nontraditional students, like community colleges. Many community college students attend part-time or enroll in multiple institutions. As a result, about 32 percent of entering students at 2-year, public institutions are included in the first-time, full-time cohorts used to calculate graduation rates according to IPEDS data. The IPEDS Technical Review Panel has considered using a separate measure for part-time students, but such data would still exclude transfer-in students.

These limitations in IPEDS graduation rates, which are widely acknowledged by Education, schools, and researchers, are primarily due

to the structure of the IPEDS collection process. IPEDS data are collected at the institution level, and there is generally no way at present to track outcomes for students who transfer from one institution to another. Some states have developed their own postsecondary data systems capable of tracking students who move among schools—at least within the state. While the Higher Education Opportunity Act explicitly prohibited Education from developing, implementing, or maintaining a federal database that tracks individual students (including a student unit record system), it also provided explicitly that a state or a consortium of states could do so.²²

Despite the limitations of IPEDS graduation rates, disaggregating graduation rate data by race, ethnicity, and income could still be somewhat beneficial for examining achievement gaps among schools and assisting prospective students in the college selection process. IPEDS is the primary federal source for comparable institution-level data on graduation rates. Other sources of graduation rate information, such as the Beginning Postsecondary Students Longitudinal Survey, can be used to track nationwide trends in graduation rates, but the sample size is too small for examining individual institutions.²³ Postsecondary education researchers told us IPEDS data on graduation rates capture the wide range of variability in graduation rates among institutions that is missed by other surveys. Additional graduation rate data would still be limited to first-time, full-time, degree/certificate seeking students, but disaggregating IPEDS graduation rate data by race, ethnicity, and income would provide researchers with a starting point for identifying schools that are doing comparatively effective or ineffective jobs at graduating certain types of students. This information could be used to increase transparency or to solicit best practices from institutions with higher graduation rates. The information could also assist students and parents in selecting schools that have done a more effective job of graduating certain types of students. For example, students can currently use Education’s College Navigator Web site to search for existing graduation rate data on prospective schools.²⁴

²²20 U.S.C. 1015c.

²³Beginning Postsecondary Students Longitudinal Survey is conducted by Education and follows students who first begin their postsecondary education. These students are asked questions about their experiences during, and transitions through, postsecondary education and into the labor force, as well as family formation. Transfers, dropouts, and vocational completers are among those included in the studies.

²⁴See www.nces.ed.gov/collegenavigator/.

More detailed graduation rate data would provide these students with further information before making their decisions.

Schools Could Use Existing Data to Calculate Graduation Rates by Race and Ethnicity at a Modest Burden

Schools already collect data on student race and ethnicity that they could use to report more detailed graduation rate data at a modest burden. All schools that complete IPEDS are required to collect student race and ethnicity data and report it in the Fall Enrollment, 12-Month Enrollment, and Completions Surveys. In addition, 4- and 2-year schools are already required to report some race and ethnicity data on the Graduation Rates Survey. Table 3 describes the graduation rate data schools were required to submit during the 2009-2010 IPEDS collection.

Table 3: IPEDS Graduation Rate Data Currently Collected by Race and Ethnicity

| Level of institution | Graduation rate data reported by race and ethnicity | Graduation rate data not reported by race and ethnicity |
|----------------------|---|--|
| 4-year | <ul style="list-style-type: none"> 150% normal time to completion Completed bachelor's degree or equivalent in: <ul style="list-style-type: none"> 4 years or less 5 years | <ul style="list-style-type: none"> 200% normal time to completion |
| 2-year | <ul style="list-style-type: none"> 150% normal time to completion | <ul style="list-style-type: none"> 100% normal time to completion 200% normal time to completion |
| Less than 2-year | | <ul style="list-style-type: none"> 100% normal time to completion 150% normal time to completion 200% normal time to completion |

Source: GAO analysis of IPEDS surveys.

Although less than 2-year institutions do not currently report any IPEDS graduation rate data by race and ethnicity, they were required to report these data prior to the 2004-2005 IPEDS collection. Education officials told us they shortened the Graduation Rates Survey for less than 2-year institutions to help lower their reporting burden. In addition, many less than 2-year schools also have small numbers of students, so disaggregating graduation rates into multiple categories can produce small subgroups

that are statistically unreliable and risk revealing personally identifiable information, according to Education officials.²⁵ For example, if only one female Asian/Pacific Islander is enrolled in a school, reporting a separate graduation rate for this subgroup would not yield any statistically useful information.

Keyholders we spoke with said reporting all graduation rate data by race and ethnicity would increase their reporting burden by a modest amount. The majority of keyholders we interviewed said reporting race and ethnicity for every graduation rate they report would be either slightly or moderately burdensome.²⁶ For example, a keyholder from a less than 2-year institution told us that graduation rates could be calculated using race and ethnicity data the school already collects, but it would be more time-consuming. The additional burden would arise because schools would have to make additional calculations and enter data into more survey cells.

Calculating Graduation Rates by Income Would Be Limited to Students That Applied for Federal Student Aid and Be Very Burdensome for Schools to Report

Collecting graduation rates by income for all students would be difficult because income data are only available on students that apply for federal financial aid. In general, schools only collect income data from students that complete the Free Application for Federal Student Aid (FAFSA), which includes questions about students' and parents' income.²⁷ According to Education data, 71 percent of full-time undergraduate students apply for federal financial aid nationwide, but the percentage varies substantially by type of institution. Obtaining income information on the remaining students would be difficult because students may be unwilling to voluntarily disclose this information, and the data could be unreliable, according to researchers and keyholders. Unlike FAFSA income data, which are based on IRS forms and subject to verification, alternative methods of collecting income data depend on self-reported information that is prone to errors. In light of these challenges, schools currently could only reliably report graduation rates by income for the subgroup of

²⁵NCES does not publicly disclose personally identifiable IPEDS data.

²⁶Keyholders were asked to estimate the potential burden that would be imposed by collecting and reporting additional types of graduation rate data through IPEDS using a scale from 1 to 5: (1) not at all burdensome, (2) slightly burdensome, (3) moderately burdensome, (4) very burdensome, (5) extremely burdensome.

²⁷The FAFSA only collects information on parents' income if the student is classified as financially dependent on their parents. The FAFSA also collects income data on a student's spouse if applicable.

students that complete a FAFSA.²⁸ These data would provide information on students that receive federal assistance, but they may not be representative of all students. In addition, using FAFSA income data for unintended purposes may raise privacy concerns.

The majority of keyholders we interviewed said reporting graduation rates by income would be either very or extremely burdensome. The results were consistent across all levels of institutions. Calculating these graduation rates may require institutions to merge financial aid databases containing income data with student record databases containing enrollment and completion data. These databases can be maintained in different offices at an institution and, as previously discussed, coordination with other offices is an important factor in determining the burden of IPEDS reporting.

Researchers and some keyholders we interviewed suggested that rather than using income data, schools could report graduation rates based on whether or not students received federal Pell Grants. Since Pell Grants are awarded to low-income students, a student's Pell Grant status could be used as a proxy for income. Although the data are not collected through IPEDS, the Higher Education Opportunity Act included a new provision that requires institutions to disclose graduation rates disaggregated by recipients of Pell Grant status to prospective and enrolled students upon request.²⁹ Some state higher education systems are already using Pell Grant status to analyze graduation rates and voluntarily reporting the information through a mechanism other than IPEDS. Half of the keyholders we interviewed said it would be easier to calculate graduation rates by Pell Grant status than income. For example, one keyholder told us Pell Grant status is a simple yes/no question compared with more complex income data. However, other keyholders told us reporting graduation rates by Pell Grant status would present the same challenges and be just as burdensome as reporting the data by income.

²⁸Schools could group all students for which income data is not available into a separate category for analyzing graduation rates.

²⁹20 U.S.C. § 1092(a)(7)(A). The provision also requires that completion or graduation rates must be disaggregated by recipients of a subsidized Stafford Loan who did not receive a Pell Grant, as well as students who did not receive either a Pell Grant or a subsidized Stafford Loan. The requirement for disaggregation does not apply to 2-year degree-granting institutions until academic year 2011-2012.

Conclusions

When the federal government collects information from the public, the usefulness of the information must be balanced against the burden it imposes. This trade-off is clearly apparent with IPEDS, which provides Education and the public with valuable information on postsecondary education, but it also creates a burden on all institutions that collect and report the data. To effectively weigh the benefits of IPEDS against the collection costs, it is essential for policymakers to have reasonable estimates of the reporting burden. However, Education's current IPEDS estimates appear to be low. As a result, policymakers run the risk of making future decisions about IPEDS without knowing how those decisions will affect the burden on postsecondary institutions. Accurate burden estimates are therefore essential when considering collecting additional data, such as detailed graduation rates, or scaling back particular survey sections.

It is also important to minimize the burden imposed by data collections. Several options exist for reducing the IPEDS reporting burden without sacrificing valuable data. These options, including improving communication about training opportunities, would be particularly beneficial to small schools that generally have a higher relative burden. These institutions may not have the resources to devote staff to institutional research and reporting full-time. Minimizing the burden on these schools would free up staff to focus on their numerous other duties that are essential to operating a postsecondary institution.

When considering the expansion of existing information collections, it is important that policymakers also understand the strengths and limitations of available data. In the case of IPEDS graduation rates, there are significant limitations with the current collection of data that reduce their usefulness as an accountability measure for schools. Until these underlying issues are addressed and, for example, postsecondary data systems are developed that are capable of tracking all students who transfer among schools, additional graduation data will only provide insights into the outcomes of one, albeit a large, subgroup of students.

Recommendations for Executive Action

We recommend that the Secretary of Education direct the Commissioner of NCES to take the following three actions:

To improve the availability of reliable information to Congress and postsecondary institutions about postsecondary institutions' data collection efforts, reevaluate the official IPEDS burden estimates and establish new baseline estimates as appropriate.

To help reduce the reporting burden on postsecondary institutions:

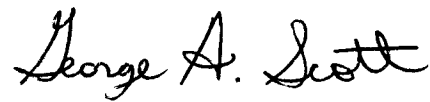
- Improve how NCES communicates IPEDS training opportunities to a wider range of institutions, particularly smaller career and technical institutions outside of traditional higher education networks.
- Coordinate with higher education software providers to help enhance the quality and reliability of IPEDS reporting features.

Agency Comments and Our Evaluation

We provided a draft of this report to Education for review and comment and received a written response from NCES, which is reprinted in appendix II. NCES generally agreed with our recommendations and highlighted several steps it has taken, or intends to take, to address issues raised in our report. For example, NCES has already initiated a review of its IPEDS burden estimates, which includes a study of the methodologies used by other federal agencies that might assist NCES in making more accurate estimates. To communicate training opportunities to a wider range of institutions, NCES plans to send dedicated e-mails about training opportunities to keyholders and expand its outreach among networks of career and technical institutions. In response to our recommendation to coordinate with higher education software providers, NCES noted, as we do in this report, that some schools do not use commercially available campus data systems. NCES stated that it will take steps to coordinate with software providers and others that assist institutions with IPEDS reporting by creating a central online source of relevant IPEDS information for software providers and enabling them to register for e-mails about IPEDS updates.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Education, and other interested parties. The report also is available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff members have any questions about this report, please contact me at (202) 512-7215 or scottg@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix III.

A handwritten signature in black ink that reads "George A. Scott". The signature is written in a cursive style with a large initial "G" and "S".

George A. Scott, Director
Education, Workforce, and Income Security Issues

Appendix I: Objectives, Scope, and Methodology

The objectives of this report were to identify (1) the time and cost burden for postsecondary schools completing the Integrated Postsecondary Education Data System (IPEDS) surveys, (2) options for reducing this burden, and (3) the potential benefits and challenges of collecting additional data on institutions' graduation rates. To address these questions, we analyzed existing estimates of the IPEDS time and cost burden; reviewed relevant laws and documents; and interviewed Department of Education (Education) and Office of Management and Budget officials, higher education researchers, higher education associations, and higher education software providers. We also interviewed institution staff, known as keyholders, who are responsible for entering data into the IPEDS surveys from 22 postsecondary institutions.

Document Review

To understand the IPEDS time and cost burdens, we reviewed Education documents on existing estimates of the IPEDS time and cost burdens. We reviewed Education's January 2009 Paperwork Reduction Act submission to the Office of Management and Budget that established the official burden estimates published in the Federal Register. We compared these estimates with time burdens reported by 22 schools we contacted as described below. We also reviewed a 2009 National Center for Education Statistics (NCES) internal study that evaluated the reported time burden at nine institutions and relevant GAO reports on the Paperwork Reduction Act.

To examine options for reducing the burden, we also reviewed documents from the IPEDS Technical Review Panel meetings. To examine the feasibility of collecting additional graduation rate data, we examined the 2009-2010 IPEDS graduation rates surveys to identify what data are currently collected.

Analysis of Sample of Postsecondary Schools and Keyholders

To collect information on all three of our objectives, we selected a nonprobability sample of 22 postsecondary schools.¹ While limiting our sample to 22 schools precluded us from generalizing our findings to the entire population of postsecondary schools, our approach allowed us to

¹Results from nonprobability samples cannot be used to make inferences about a population because in a nonprobability sample some elements of the population being studied have no chance or an unknown chance of being selected as part of the sample.

conduct detailed, in-person interviews with keyholders and relevant staff without substantially burdening the schools. This sample of 22 institutions represented a range of 4-year, 2-year, and less than 2-year institutions, as well as public, not-for-profit, and proprietary institutions in four different geographic areas of the country and the District of Columbia, as illustrated in table 4. We selected our sample of 22 schools to generally correspond with the proportion of 4-year, 2-year, and less than 2-year schools and sectors (public, private not-for-profit, and private for-profit) in the population of postsecondary schools receiving funding under Title IV of the Higher Education Act. Our sample included schools with relatively large and small enrollments for each major category of institutions. Our 22 institutions also included one Historically Black College and University, one Predominantly Black Institution, one Hispanic Serving Institution, and two Tribal Colleges. To understand the unique challenges faced by new keyholders, we included 6 new keyholders in our sample. While new keyholders comprised 11 percent of all keyholders in 2008, oversampling new keyholders in our study allowed us to analyze new keyholder experiences over a broad range of types of schools. Because we found that staff experience is a determinant of the burden, this oversampling increases the overall level of burden our sample reported over what might have been found in a sample with fewer new keyholders.

Table 4: List of Institutions Included in Study

| Name of institution | Location | Sector | Level |
|--|-------------------|------------------------|------------------|
| Belmont Abbey College | Belmont, NC | Private not-for-profit | 4-year or above |
| Blue Hills Regional Technical School | Canton, MA | Public | Less than 2-year |
| Boston University | Boston, MA | Private not-for-profit | 4-year or above |
| Brookstone College | Charlotte, NC | Private for-profit | Less than 2-year |
| Bunker Hill Community College | Boston, MA | Public | 2-year |
| Central Piedmont Community College | Charlotte, NC | Public | 2-year |
| Chicago State University | Chicago, IL | Public | 4-year or above |
| City Colleges of Chicago ^a | Chicago, IL | Public | 2-year |
| College of Santa Fe | Santa Fe, NM | Private for-profit | 4-year or above |
| Coyne American Institute Inc | Chicago, IL | Private for-profit | 2-year |
| FINE Mortuary College LLC | Norwood, MA | Private for-profit | 2-year |
| Institute of American Indian and Alaska Native Culture | Santa Fe, NM | Public | 4-year or above |
| Livingstone College | Salisbury, NC | Private not-for-profit | 4-year or above |
| Navajo Technical College | Crownpoint, NM | Public | 2-year |
| Pine Manor College | Chestnut Hill, MA | Private not-for-profit | 4-year or above |
| Strayer University ^a | Washington, DC | Private for-profit | 4-year or above |

Appendix I: Objectives, Scope, and Methodology

| Name of institution | Location | Sector | Level |
|---|-----------------|------------------------|------------------|
| Taylor Business Institute | Chicago, IL | Private for-profit | 2-year |
| Universal Therapeutic Massage Institute | Albuquerque, NM | Private for-profit | Less than 2-year |
| University of Aesthetics | Chicago, IL | Private for-profit | Less than 2-year |
| University of New Mexico ^a | Albuquerque, NM | Public | 4-year or above |
| University of North Carolina, Charlotte | Charlotte, NC | Public | 4-year or above |
| Vandercook College of Music | Chicago, IL | Private not-for-profit | 4-year or above |

Source: GAO.

^aKeyholders at these schools were responsible for reporting for multiple campuses.

We conducted in-person interviews with keyholders and relevant staff at each institution in our sample.² We conducted these interviews from January to March, 2010, which allowed us to interview keyholders at the end of the fall and winter IPEDS reporting cycles, while the surveys were relatively fresh in keyholders' minds. During these structured interviews, we asked the institution staff to estimate the time it took to prepare for and complete each survey component. To limit the potential for self-reported over- or underestimates of the burden, we structured our interviews to ask a detailed series of both open- and closed-ended questions about the processes and staff resources required to complete each survey. We also conducted a second round of follow-up phone interviews with keyholders in May 2010 to confirm keyholders' initial time estimates and to collect time estimates for the spring collection cycle, which many keyholders had not completed at the time of our in-person interviews. This second round of follow-up interviews also enabled us to ask keyholders about the spring surveys' time estimates soon after the spring collection closed, while these surveys were still fresh in their minds. We also used these two rounds of interviews to examine options for reducing the burden and to understand the benefits and challenges involved in collecting additional graduation rate data, disaggregated by race, ethnicity, and income.

Additional Interviews

To examine the methodology and assumptions used to create Education's burden estimates, we interviewed officials from NCES and the Office of Management and Budget's Office of Information and Regulatory Affairs. We also interviewed staff from two organizations that Education contracts with to operate and support IPEDS, RTI International and the Association

²We conducted a preliminary site visit at the University of Maryland, College Park, in November 2009 to help develop the keyholder interview protocol.

for Institutional Research. We also used these interviews to examine options for reducing the IPEDS burden, as well as to understand the benefits and challenges of collecting additional information on graduation rates.

To understand the IPEDS reporting burden for schools and to understand options for reducing this burden, we interviewed experts from a broad range of higher education associations including the American Council on Education, the American Indian Higher Education Consortium, the Career College Association, the State Council of Higher Education for Virginia, the State Higher Education Executive Officers, and The Institute for College Access and Success. To examine challenges with software's IPEDS reporting features, we interviewed representatives from four major higher education software providers. We selected these providers based on the findings of an NCEES-sponsored study examining the prevalence of software use among keyholders.

To examine the benefits and challenges of collecting additional data on graduation rates, in addition to the groups listed above, we interviewed experts from Education Sector, the Association of Public Land Grant Universities, Education Trust, the Institute for Higher Education Policy, and the Delta Cost Project.

We conducted this performance audit from August 2009 to August 2010, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Comments from the Department of Education



U.S. DEPARTMENT OF EDUCATION
INSTITUTE OF EDUCATION SCIENCES

NATIONAL CENTER FOR EDUCATION STATISTICS

August 2, 2010

Mr. George A. Scott
Director
Education, Workforce, and Income Security Issues
United States Government Accountability Office
Washington, DC 20548

Dear Mr. Scott:

Thank you for providing the Department of Education with a draft copy of the U.S. Government Accountability Office's (GAO's) report entitled, "HIGHER EDUCATION: Institutions' Reported Data Collection Burden Is Higher Than Estimated but Can Be Reduced Through Increased Coordination" (GAO-10-871).

This study looks at the reporting burden for postsecondary institutions through the Integrated Postsecondary Education Data System (IPEDS), including Education's estimates of that burden and opportunities to reduce burden for institutions. It also examines the feasibility and burden associated with collecting additional graduation rate data.

Regarding the recommendations made in the report, the National Center for Education Statistics (NCES) responds as follows:

Recommendation #1: *To improve the availability of reliable information to Congress and postsecondary institutions about postsecondary institutions' data collection efforts, re-evaluate the official IPEDS burden estimates and establish new baseline estimates as appropriate.*

Response: NCES agrees with this recommendation and has begun steps to address it. Burden estimates have been made available for comment for 90 days through postings in the *Federal Register*. However, it was not until 2007 that data providers first commented on burden estimates in posting Federal Register comments, suggesting that this process does not adequately elicit from data providers their evaluation of burden estimates. To address this problem, we will include specific burden estimates in the Technical Review Panel summaries that are posted to the IPEDS Web site for comment, and will alert all keyholders of the opportunity to comment on those estimates via an announcement in our "This Week in IPEDS" electronic newsletter.

We have a two-year process of burden estimate review underway. In 2008, we commissioned an internal study to examine our burden estimates, and we have initiated a 2010 follow-up study to examine methodologies used by other federal agencies that might assist NCES in making more accurate estimates.

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Recommendation #2: *To help reduce the reporting burden on postsecondary institutions, improve how NCES communicates IPEDS training opportunities to a wider range of institutions, particularly smaller career and technical institutions outside of traditional higher education networks.*

Response: NCES agrees with this recommendation. The IPEDS program offers extensive training opportunities both by NCES staff and through its training subcontract with the Association for Institutional Research. All IPEDS keyholders are alerted to these training opportunities through announcements in “This Week in IPEDS.” However, to draw greater attention to them, we will send separate e-mails exclusively about training. In addition, as noted in your report, many small career and technical colleges do not belong to the national associations through which we have targeted training. We will continue to work with the Career College Association to provide better outreach, and will also expand our efforts into new networks, for example, the National Accrediting Commission of Cosmetology Arts and Sciences, which accredits approximately 1,300 institutions.

Recommendation #3: *To help reduce the reporting burden on postsecondary institutions, coordinate with higher education software providers to help enhance the quality and reliability of IPEDS reporting features.*

Response: NCES agrees with the goal of “enhanc[ing] the quality and reliability of IPEDS reporting features.” We note, however, that institutions may opt not to purchase reporting applications that are commercially developed. This is true both of small and large institutions. Many small institutions do not have a need for a sophisticated student data system or the resources to invest in one. They often maintain their student records using more common software such as Microsoft Excel or Microsoft Access. Larger institutions often have homegrown data systems or have developed their own programming code and methods for reporting to IPEDS that complement the vendor-provided software they use for other purposes on their campuses. In addition, because different types of institutions report different types of data to IPEDS, even if vendors improve the IPEDS modules within their product, it is likely that they will still need to customize them for different institutions, often at additional costs to those institutions.

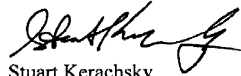
NCES will take steps to better coordinate with software vendors and others that assist institutions in reporting to IPEDS. We will create a vendor page within the IPEDS Web site that will include a link to the IPEDS Data Provider Center, with descriptions of resources available (e.g., collection schedule, proposed changes, and survey materials) and the timetable for availability. This area of the Web site will also provide a link to IPEDS training opportunities and descriptions of the training that is available. To alert these third parties to changes to that area of the Web site, we will offer them the option to “register” as an IPEDS-related vendor and e-mail them about any new information that is posted.

**Appendix II: Comments from the Department
of Education**

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I appreciate your examination of this issue. NCES is committed to providing more accurate burden estimates for this data collection and improving communication and coordination of training opportunities to help institutions reduce reporting burden.

Sincerely,



Stuart Kerachsky
Deputy Commissioner, NCES

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

George A. Scott, (202) 512-7215, or scottg@gao.gov

Staff Acknowledgments

In addition to the individual named above, the following staff made key contributions to this report: Gretta L. Goodwin, Assistant Director, and William Colvin, Analyst-in-Charge, managed all aspects of this assignment, and Grace Cho, Analyst, and Edward Leslie, Analyst, made significant contributions to all phases of the work. In addition, Carl M. Ramirez and Beverly Ross provided methodological assistance; Craig H. Winslow provided legal counsel; Susannah Compton assisted in message and report development; and James Bennett and Mimi Nguyen drafted the report's graphics.

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