

Report and Suggestions from IPEDS Technical Review Panel 47: Clarifying Study Abroad Enrollment

Based on a review of the current IPEDS guidance related to study abroad students, the Technical Review Panel considered clarifications to the definition of study abroad programs and provided suggestions for clear guidance on various situations of study abroad and clear guidelines for counting study abroad students in the affected survey components. Comments from interested parties are due to Janice Kelly-Reid, IPEDS Project Director at RTI International, at ipedstrpcomment@rti.org by September 10, 2015.

On June 23 and 24, 2015, RTI International, the contractor for the Integrated Postsecondary Education Data System (IPEDS) web-based data collection system, convened a meeting of the IPEDS Technical Review Panel (TRP) in Washington, DC. Meetings of the IPEDS TRP are conducted by RTI to solicit expert discussion and suggestions on a broad range of issues related to postsecondary education and the conduct of IPEDS. The TRP is designed to allow the public to advise and work with RTI to improve IPEDS data collection and products, data quality, and user-friendliness. The TRP does not report to or advise the Department of Education.

RTI's specific purpose for TRP 47 was to discuss potential changes to current guidance on reporting study abroad students throughout IPEDS, and how changes would impact institutions, researchers, and the Department of Education. The panel consisted of 38 individuals representing institutions, researchers and other data users, state governments, the federal government, higher education associations, and other experts. A number of panelists came from a study abroad background and had expert knowledge of postsecondary study abroad policies and practices.

Background

NCES activities are designed to address high-priority education data needs; provide consistent, reliable, complete, and accurate indicators of education status and trends; and report timely, useful, and high-quality data. The definitions used in IPEDS are often adopted by other entities and are used as the starting point for definitions in nonfederal data collections. Recently, NCES has received questions about how institutions should report study abroad students in the IPEDS data collection. Although NCES has tried to provide an adequate solution and guidelines for counting study abroad students in IPEDS, feedback from the IPEDS community suggests that institutions interpret the instructions in multiple ways, resulting in different reporting practices across institutions. Perhaps the most affected of the sectors on the issue of study abroad has been the private nonprofit 4-year institutions that offer study abroad opportunities not only to students in their junior and senior year, but also to first and second year students.

Although study abroad represents a small fraction of the nation's enrollment and aid disbursement, this activity affects the overall comparability of IPEDS data in several areas, particularly on enrollment counts; student-to-faculty ratios; retention rates; student charges and average net price; graduation rates and outcome measures; and revenues and expenses per full-time equivalent (FTE) student by function. Differences in how institutions account for study abroad students make comparing institutional data difficult. IPEDS data have many audiences, such as consumers; Congress; federal, state, and local governments; education providers; accountability groups; and others, and it is important that the data submitted to IPEDS be accurate.

RTI convened this TRP to engage the community in a discussion about actions that could improve IPEDS instructions related to study abroad students. To that end, the panel was asked to focus their review on technical issues related to reporting study abroad students in the enrollment surveys and

clarifications to already existing IPEDS data collection elements, rather than introducing new data items into the collection.

Study Abroad in IPEDS

IPEDS defines study abroad programs as the “arrangement by which a student completes part of the college program studying in another country. [It] can be at a campus abroad or through a cooperative agreement with some other U.S. college or an institution of another country.”¹

Study abroad programs are typically structured in the following ways:²

- operated by home institutions;
- approved or affiliated programs;
- student exchanges;
- classes with educational travel abroad;
- educationally oriented travel abroad activities; and
- independent study abroad.

Institutions with study abroad opportunities may offer any or all of the different types of programs listed above. Institutionally operated study abroad programs, approved or affiliated programs, and student exchanges are all programs designed to result in academic credit, but the role of the home institution can vary in terms of the scope of operations (e.g., how the student is being educated and whose resources are being used to educate that student). Educationally oriented travel abroad activities refer to service learning, internships, or academic extension activities at foreign institutions,³ which do not result in credit toward a degree or certificate. Classes taken at the home institution with a short educational travel abroad component and independent study abroad are not considered full-study abroad programs by IPEDS because students may travel abroad for short periods (1-2 weeks) and the home institution is not made aware of the independent study abroad. Therefore, students enrolled in these last 3 types of study abroad programs (classes with educational travel abroad, educationally oriented travel abroad activities, and independent study abroad) are not relevant to the TRP discussion.

Each year, IPEDS collects institution-level data on student enrollment that affects other IPEDS survey components and are used to create derived variables. Under the current guidelines, only study abroad students who are not considered administrative records are counted, which means not all study abroad students are supposed to be reported to IPEDS. However, institutions with large populations of study abroad students want to report all study abroad students to better portray their institution’s enrollment. In addition, differences in institutional reporting practices suggest that the instructions are subject to some degree of interpretation, and it is unclear how (or if) institutions follow the current guidance in the IPEDS instructions and study abroad FAQ.

This ambiguity can contribute to different counting practices and inaccurate data reporting. Specifically, inconsistencies in how institutions are reporting study abroad enrollment lead to:

¹ <http://nces.ed.gov/ipeds/glossary>

² These study abroad programs are defined and discussed in the unpublished 2013 NPEC Report, *Clarifying How Study Abroad Students are Reported in IPEDS*

³ These educationally oriented travel abroad activities are discussed in the unpublished 2013 NPEC Report, *Clarifying How Study Abroad Students are Reported in IPEDS*

- the possible undercounting of students, as institutions forgo reporting students enrolled in study abroad programs in the enrollment counts and cohort construction for retention rates, graduation rates, and outcome measures; this issue is significant for some institutions that have a large proportion of their first-year students studying abroad; and
- the possible double-counting of students if students are reported as enrolled at both the home and host institutions.

Excluding or double-counting study abroad students in the IPEDS enrollment data can skew graduation rates, financial aid (including average net price), retention rates, and FTE student enrollment. The TRP aimed to clarify current instructions and FAQs for reporting study abroad students so that institutions can report more consistent and accurate data to IPEDS. The panelists were asked to provide a clear definition of study abroad programs, clear guidance for various situations of study abroad enrollment, and clear guidelines for the treatment of study abroad students for each of the affected survey component.

Discussion Item 1: Counting Study Abroad on Fall and 12-Month Enrollment

Both IPEDS enrollment surveys instruct institutions to exclude any student studying abroad (e.g., at a foreign university) if their enrollment at the “home” institution serves as an **administrative record**. A Fall Enrollment FAQ further clarifies that students who are enrolled in the home institution and attend classes in a foreign country should be included in the home institution’s enrollment report if the home institution provides **instructional resources** (classroom, instructors), even though the education occurs abroad. Students who are enrolled in the home institution and attend classes in a foreign country should NOT be included in the home institution’s enrollment report if

- the students are enrolled ONLY in courses offered by another institution;
- the students are enrolled at a branch campus of the home institution in a foreign country; and
- the home institution does not provide instructional resources (i.e., classrooms, instructors), even if the student pays tuition to the institution—that is, their enrollment at the institution serves only as an administrative record.

Discussion: Reporting Study Abroad Students in IPEDS Enrollment Counts

Given that the types and requirements of study abroad programs offered by institutions vary widely, some institutions remain unclear about how their study abroad programs fit within the current instructions, particularly the administrative record guideline. In general, “administrative records” refers to a record in an institution’s student record system that the registrar, or custodian of academic records at the institution, refuses to validate enrollment since it is known that the student is pursuing instruction elsewhere. Historically, the use of this term was more prevalent in the 1980s and 1990s when the surveys were administered by Higher Education General Information Surveys (HEGIS).

Panelists noted that a number of institutions have been counting study abroad students and do not view these students as administrative records. More specifically, IPEDS guidance states that if the home institution does not provide the instructional resources (i.e., classrooms, instructors), the study abroad student is considered an administrative record and should not be reported by the home institution, even if the student pays tuition to the home institution. However, this guideline has been questioned due to concern over non-instructional resources (e.g., financial aid, academic advising, technology support, library access, faculty support, etc.) that institutions do provide. Given that the

non-instructional resources are still at a cost to the institutions, some schools have been counting the study abroad students, which lead to inconsistent interpretation of the guidelines.

The panel agreed that in general, study abroad students should be included in IPEDS enrollment reporting regardless of which institution provides the resources. The challenge is identifying and describing clearly to institutions which institution should report the student's enrollment. The panel agreed that the instructions should be clear regarding which study abroad students should be reported. Given that administrative records are a source of confusion for many institutions, the panel suggested removing references to administrative records from the current guidance.

The panel discussed aspects of the institutions' operations that could be used to help identify which study abroad students should be included in enrollment counts; these aspects include providing instruction, processing financial aid, awarding credit, and charging tuition. As an alternative to basing enrollment determination on institutions' operations, the panel considered a support-based definition: i.e., institutions should include their study abroad students if they supported the students' enrollment at the other institution. Although the panel identified several activities that fall under enrollment *support*, including academic advising, housing support, and faculty support, the panel did not reach a conclusion on the most appropriate way to clarify support. Moreover, some panelists raised concern with this approach because parsing out the different types of support or services offered to study abroad students increases the complexity of the data collection and would be overly burdensome for institutions to track.

Panelists also discussed using financial aid status to identify which study abroad students should be excluded and which should be reported. Under this approach, the institution that processes the student's aid should report their enrollment in the EF and E12 enrollment counts. However, panelists noted that linking enrollment data to financial aid eligibility can be difficult because students may be *eligible* for student financial aid based on their enrollment in a program or course but may not receive aid (e.g., self-pay students), and implementing this guidance would require institutions to conduct a review of course eligibility.

A panelist noted that being "enrolled" at an institution is largely based on a student's matriculation status in the institution's student data systems. For example, at one institution, three scenarios of study abroad programs exist and students in each are treated differently in the data system. One, students enrolled in a degree or certificate program at the home institution and studying abroad in **institutionally operated programs** are matriculated students in the home institution's data system. These students remain "enrolled" at the home institution and automatically receive graded credit on their transcripts for the course taken abroad. Two, students enrolled in a degree or certificate program at the home institution and taking courses in **approved study abroad programs operated by other institutions** are flagged in the home institution's data systems as taking leave to participate in study abroad activities elsewhere. These students, though on leave, remain matriculated students in the institution's data systems. Students receive transfer credit for the courses taken abroad and grades are not included on the home institution transcript. Finally, the institution also serves as a **host institution** for other institutions' study abroad students. Since these students have not been admitted to the institution in a degree or certificate program, the institution considers them to be visiting students, and therefore not "enrolled" or matriculated. In other words, an institution knows who is and is not their student in the data system.

While this is one example of how students are "matriculated" in one panelist's data system, other panelists brought up other methods used for recording study abroad students in their systems. Although several panelists agreed that the purpose of the enrollment counts are to measure how many

students are earning credit/making progress toward a degree or certificate, they were unable to clarify the term “matriculation.”

Proposed Guidance Related to Study Abroad Students in IPEDS

Clear Definition of Study Abroad Program

The panel suggested no change to the IPEDS **study abroad** definition: Arrangement by which a student completes part of the college program studying in another country. Can be at a campus abroad or through a cooperative agreement with some other U.S. college or an institution of another country.

Clear Guidance for Various Situations of Study Abroad

The panel suggested no change to the current instructions for **who to include**. Institutions should include all students enrolled for credit (courses or programs that can be applied toward the requirements for a postsecondary degree, diploma, certificate, or other formal award), regardless of whether or not they are seeking a degree or certificate.

The panel suggested edits to the current instructions for **who to exclude**; specifically, remove the following text:

Who to Exclude

Exclude students who are **not** enrolled for credit. For example, exclude:

- Students enrolled exclusively in courses that cannot be applied towards a formal award;
- Students enrolled exclusively in Continuing Education Units (CEUs)
- Students exclusively auditing classes
- Residents or interns in doctor's - professional practice programs, since they have already received their doctor's degree

~~In addition, the following students should be excluded:~~

- ~~• Any student studying abroad (e.g., at a foreign university) if their enrollment at the 'home' institution serves as an administrative record~~

~~Students in any branch campus located in a foreign country~~

The panel discussed the following clarifications:

Institutions should include all study abroad students enrolled for credit, whether enrolled for credit at their institution or abroad. This guidance would allow institutions to count both students enrolled as degree/certificate-seeking at their institution who are taking courses abroad and students enrolled as degree/certificate-seeking at a foreign institution who are enrolled for credit at their institution.

Panelists expressed concern that this guidance does not resolve the issue of double-counting student enrollment. The home institution is the one at which a student is seeking a degree or certificate; the host institution is the one at which the student is a visiting student and taking courses for credit, but is not seeking a degree or certificate at the host institution. A student seeking a degree or certificate at the home institution and taking courses at the host should be counted at that “home” institution. Double counting occurs when the “host” institution is counting that student who has no intention of getting a degree.

Clear Guidelines for Counting Study Abroad Students

IPEDS enrollment affects several areas other IPEDS survey components, specifically the Institutional Characteristics (IC), Student Financial Aid (SFA), Graduation Rates (GR/GR200), Outcome Measures (OM), and Finance (F) components.

The panel clarified that the home institution should report all students enrolled for credit who are degree/certificate-seeking students at the institution. The host institution should report visiting students (e.g., study abroad students or students who are degree/certificate-seeking at another institution) taking courses for credit as non-degree/non-certificate-seeking at the host institution. In effect, an IPEDS institution who serves as a home institution for its study abroad students and as a host institution for another institution's study abroad students would be able to count both populations.

Discussion: Branch Campuses Outside the U.S.

The current instructions are not clear for foreign branch campuses. IPEDS does not provide an IPEDS UnitID to foreign campuses and does not provide a definition of foreign branch campus. However, the U.S. Department of Education Federal Student Aid (FSA) office provides and tracks foreign branch campuses that have students who are Title IV federal student aid recipients. Although IPEDS and FSA data systems use the same term (i.e., branch campus) to refer to additional locations, different constructs result in the nonalignment of reporting units between IPEDS and FSA data systems.

Panelists noted that a defining characteristic of a branch campus is having a full program of study. Foreign branch campuses can have accrediting agency approval under the same accreditation umbrella as the home institution or can be independently accredited but share some version of name of the home university for branding purposes. While some institutions keep student records for students attending a foreign branch campus and can query their data systems to report the enrollment status of such students, some institutions store student records for students attending foreign branch campuses under a different registration construct that does not map to the U.S. main campus.

The panel agreed that degree/certificate-seeking students enrolled at the home institution and attending foreign branch campuses should be included in the home institution's IPEDS enrollment counts, provided that additional clarifications are made between students at the foreign branch campus. For example, IPEDS home institutions would include their study abroad students taking courses for credit at the foreign branch campus. However, locally-based students who are enrolled and taking courses for credit at the foreign branch campus would not be included.

Discussion: International Students Studying Abroad at IPEDS Institutions

Panelists were asked to consider whether international students enrolled at foreign institutions who are taking courses for credit through a study abroad program at an IPEDS institution should be counted in enrollment. Panelists discussed several options, such as counting U.S. study abroad students at a host institution and counting these international students. However, panelists raised concerns about over counting and losing the ability to conduct trend analyses across this change. IPEDS enrollment data serve multiple purposes for various stakeholders. For example, NCES issues the *Digest of Education Statistics*, a congressionally mandated report that provides information on the progress of education in the United States. IPEDS enrollment counts are used to calculate student populations for the *Digest* and for NCES sample surveys. Including both international students who are enrolled in U.S. courses for credit and U.S. students who study abroad at a host institution could result in inflated enrollment counts.

After clarifying the guidance for various situations of study abroad, the panel agreed that any student studying abroad at their institution - whether enrolled as degree-/certificate-seeking at their school and taking courses for credit abroad or enrolled as degree-/certificate-seeking at a foreign institution and taking courses for credit at their school - should be counted.

Discussion: Student-to-Faculty Ratio

The student-to-faculty ratio is based on the calculation of FTE undergraduate students (using fall student headcounts) divided by FTE instructional staff. A worksheet is available to help institutions determine their ratio, but the worksheet is not mandatory and data inputs are not retained. The logic used for this calculation is similar to item I-2 from the Common Data Set data collection. However, the Common Data Set definitions are more restrictive than the IPEDS guidelines.

The ratio can vary for an institution when changes are introduced to the way in which the numerator and/or the denominator of the ratio is defined. Specifically, changes to the guidance on reporting study abroad students in enrollment counts can affect the undergraduate student counts and the calculated student-to-faculty ratio if the FTE student counts are not similarly adjusted (assuming the study abroad students are not being taught by faculty from the institution).

The student-to-faculty worksheet includes allowable exclusions that are intended to make the student-to-faculty ratio more accurate without overburdening institutions. For example, institutions that have large amounts of non-credit activity can exclude non-credit instructors to better align the student data with the instructional staff data being used in the ratio. The panel was asked to consider additional exclusions for study abroad students who are instructed by non-institutional faculty. However, given that the Common Data Set student-to-faculty ratios are highlighted in a variety of publications, panelists raised concern with introducing changes to the IPEDS worksheet that would be inconsistent with the Common Data Set calculation.

The current instructions do not explicitly indicate to exclude study abroad students from the counts of fall FTE. The panel noted that if institutions could count both their degree/certificate-seeking study abroad students taking courses at a foreign institution and the foreign institution's students taking courses at their institutions, then the panelists agreed that study abroad students should remain part of the counts for FTE and suggested that no additional instructions be provided.

Additionally, several panelists questioned whether it would be possible or appropriate to use the calculation of FTE students using 12-month instructional activity (instead of the FTE using fall headcounts). They were informed that this is not possible. While the E12 component reflects the cumulative enrollment count over a full 12-month period, the Human Resources survey component provides a snapshot of the institution's human resources at a specific point in the fall that aligns with the fall student headcounts.

Discussion: Non-Credits/Zero Credits

The purpose of the EF component is to collect enrollment data on all students enrolled for credit in courses/programs that could lead to awards ranging from postsecondary certificates of less than 1 year to doctoral degrees. Fall enrollment data are collected by level of student, attendance status, race/ethnicity, and gender. In addition, the EF component collects data on the institution's undergraduate entering class, first-time student retention rates, and the student-to-faculty ratio. In every even-numbered year, data on enrollment by nine selected fields of study are collected, as is residency of first-time degree/certificate-seeking undergraduate students. In every odd-numbered year, enrollment by student age is collected.

The purpose of the E12 component is to collect unduplicated student enrollment counts and instructional activity data in postsecondary institutions for an entire 12-month period. Data are collected by level of student and by race/ethnicity and gender. Instructional activity is collected as total credit and/or contact hours attempted at the undergraduate and graduate levels. Using the instructional activity data reported, FTE student enrollment at the undergraduate and graduate level is estimated.

Total U.S. education abroad enrollment includes study abroad for academic credit, full degree programs abroad, and non-credit work such as internships and volunteering. Although study abroad is not a requirement at most institutions, panelists noted that a small amount of institutions require students to take non-credit courses to complete their award. Non-credit courses that are required for an award include a variety of activities, such as internships that do not result in academic credit but count toward fulfillment of degree requirements. Depending on the degree requirements, non-credit activity can occur domestically or abroad.

Panelists raised concern about expanding the IPEDS data collection to include students enrolled for non-credit activity (both abroad and domestically). Tracking such students for IPEDS purposes would pose serious challenges to institutions and would add significant burden. Further, the panel noted that studying abroad would never be a requirement for an award. Panelists agreed that institutions should follow the current guidelines outlined in the purposes statements of the EF and E12 components and exclude all students who are not enrolled for credit.

Discussion: Consortia

Consortia are agreements between domestic or international institutions that allow students at a home institution to study at another institution (off-campus study) that participates in that agreement. There are two issues of concern regarding consortia: 1) consortia guidelines do not align with study abroad current guidelines albeit these two are similar in program structure, and 2) the issue of double counting students at multiple IPEDS institutions in the enrollment surveys.

Current and recently published consortia instructions do not align with current study abroad guidelines. Consortia guidance indicates that the institution where the student is taking classes is the institution that should be reporting the enrollment. For example, if a student is enrolled at Institution A (the home institution) but takes courses for credit at Institution B (the consortium member), the student should be reported by Institution B (the consortium member where student is attending). If a student is taking courses at both Institution A and Institution B, the student should be reported as enrolled at both institutions. The institution where the student is taking classes for credit should include the student in their unduplicated enrollment headcount and report the student's instructional activity. For example, if a student is enrolled at Institution A (the home school) and takes classes at both Institution A and Institution B (the consortium member), the student would appear in the enrollment headcounts of both institutions. Each institution should report the instructional activity that occurs at their institution. In cases where a different institution is processing the aid, there can be a disconnect between enrollment and aid, with one school (the consortium member where student is attending) reporting the enrollment and another (the home school) reporting the aid data. The panel agreed that these students should be reported in the same manner as study abroad students. That is, institutions should count any student enrolled for credit.

Concerns were raised whether this guidance would result in more double-counting of students in consortia. For example, if a student is enrolled at the home institution and taking courses at the host institution, the student is counted as an enrolled student at both institutions and included in IPEDS enrollment data for both institutions, which results in double-counting. However, if guidance for consortia does not align with those of study abroad, the panel expressed concern on whether students who study in off-campus programs at a U.S.-based institution are reported in a different manner in IPEDS from students studying abroad in other countries.

Several panelists commented that students enrolled in courses for credit who are seeking a degree, certificate, or other formal award should be reported as degree/certificate-seeking students by the institution at which they are seeking the degree or certificate. However, the panel did not reach a solution for limiting the double-counting.

Discussion: Retention Rates

IPEDS retention rates are a measure of the rate at which students persist in their educational program at an institution, expressed as a percentage. For 4-year institutions, this is the percentage of first-time bachelor's (or equivalent) degree-seeking undergraduates from the previous fall who are again enrolled in the current fall. For all other institutions, this is the percentage of first-time degree/certificate-seeking students from the previous fall who either reenrolled or successfully completed their program by the current fall. Students enrolled in study abroad programs in their *freshman* year affect the first-time cohorts (i.e., whether these students are included in the total enrollment denominator of the retention ratio). Students enrolled in study abroad programs in their *sophomore* year affect the number of retained students (i.e., the numerator of the retention ratio).

The primary issue with the current guidance for reporting study abroad and off-campus students is that students engaged in approved or sponsored programs may or may not be included, depending on the institution's practice and how it interprets the current guidance for reporting study abroad students in IPEDS. Panelists agreed that counting any degree/certificate-seeking student enrolled in study abroad programs at their institution would provide clear guidance to retention rate reporting. With the proposed guidance, students enrolled in institutionally operated study abroad programs, including those who previously may not have been reported because the institution did not provide the instructional resources (i.e., instructors, facilities), would be counted in both the numerator and denominator of retention rates calculations.

Discussion Item 2: Impact on Graduation Rates and Outcome Measures Cohorts

Several IPEDS survey components are based on enrollment cohorts. The GR component collects data on the cohort of full-time, first-time degree/certificate-seeking undergraduate students and tracks their completion status at 150% of the normal time to complete all requirements of their program of study. The 200% Graduation Rate (GR200) survey component's primary purpose is to collect more extensive data to calculate graduation rates at 200% of normal time to complete for the cohort of full-time, first-time bachelor's or equivalent degree-seeking students at 4-year institutions; and for all full-time, first-time degree/certificate-seeking undergraduate students at less-than-4-year institutions. The purpose of the forthcoming Outcome Measure (OM) survey component is track the award status of cohorts of entering students (i.e., first-time students and non-first-time entering students by attendance level) at degree-granting institutions. Student completion and enrollment status is collected 6 and 8 years after they entered an institution. A fall cohort is used by institutions with standard academic terms (semester, trimester, quarter, 4-1-4). A full year cohort (September 1 to August 31) is used by institutions offering primarily occupational/vocational programs and operating on a continuous basis.

Cohort guidance across the surveys dictates that once a student is in the cohort, the student remains in the cohort, even if the student's status changes to part-time or the student drops out or transfers out of the institution. However, adjustments can be made to the cohort for allowable exclusions, which include the death of a student, permanent disability, military deployment, or service on an official church mission or with a foreign aid service of the federal government. The current instructions for reporting the GR/GR200 components (and the forthcoming OM component) state to exclude study abroad students, if their enrollment is an administrative record, and any student studying in a branch campus in a foreign country. However, students who are enrolled in off-campus centers are eligible for inclusion.

With the panel's proposed guidance to include any study abroad student (i.e., degree/certificate-seeking students enrolled at the home institution who are taking courses abroad and students from foreign institutions who are enrolled for credit at the institution), the panel agreed that full-time, first-time (first-year) degree/certificate-seeking study abroad students should be included in the home institution's GR/GR200 and OM cohorts as these students would likely return to their home institutions the following year. Since these students are included as non-degree/certificate-seeking students at the host institution, they should not be included in the host institution's GR/GR200 and OM cohorts.

The panel suggested editing the instructions for the GR/GR200 and OM components as follows:

- **GR/GR200 and OM Cohort Exclusions**
 - Remove the following text about exclusions:
 - Studying abroad (e.g., at a foreign university) if their enrollment at the institution is only an administrative record and the fee is nominal.
 - Enrolled in any branch campus located in a foreign country.

A panelist pointed out that adding an exclusion for study abroad students would be a stark contrast to the other allowable exclusions, which include the death of a student, permanent disability, military deployment, or service on an official church mission or with a foreign aid service of the federal government.

Discussion Item 3: Impact on Charges and Aided Students (Institutional Characteristics and Student Financial Aid)

Each year, two IPEDS survey components collect full-time, first-time data on cost of attendance: the Institutional Characteristics (IC) component and the Student Financial Aid (SFA) component. The primary purpose of the IC component is to collect basic institutional information including mission, student services, and athletic association. The IC component also collects student charges data including tuition for different levels and cost data for full-time, first-time students either for programs or for an academic year. This includes tuition and fee data as well as information on the estimated student budgets for students based on living situation (on-campus or off-campus). The cost numbers are also used in the SFA survey during the winter collection to calculate net price of attendance.

The FSA Student Handbook offers guidance on awarding Title IV student financial aid to study abroad students. If a study abroad program has higher costs than the home school, those should be reflected in the student's cost of attendance. This may result in the student's being eligible for additional FSA funds.

The current cost of attendance (COA) budget represents a typical threshold entry price for average full-time, first-time students. Currently, there are no instructions about study abroad students for the IC and SFA components. Thus, all aided full-time, first-time aided students should be reported.

Given that most students do not study abroad during their first year, a possible consequence of including study abroad costs in the average COA is to skew pricing data for the majority of full-time, first-time students. According to panelists, study abroad coursework is voluntary and is not typically included as part of a student's degree requirements. Moreover, study abroad programs can range in length from a few weeks to an entire academic year, and the associated costs can vary considerably. As a result, panelists considered eliminating study abroad costs from the COA budget due to concerns of potential misrepresentation of the averages. However, panelists noted that some institutions advertise study abroad programs as an incentive, and so omitting the pricing data may be

misleading to consumers, particularly first-generation college students who may have an interest in studying abroad.

The purpose of COA data is to provide consumers (i.e., parents and students) with comparable estimates of how much it will cost for students to attend an institution for a year. The published COA is the “sticker price” of an institution. Although many students do not pay full published tuition rates for college attendance, panelists were concerned that using a weighted average to calculate cost of attendance for the institution as a whole would overestimate the costs to attend an institution. This is an issue of particular concern at 4-year private nonprofit institutions. As an alternative to including optional study abroad program costs in an institution’s average costs, panelists suggested collecting a URL for tuition policies specifically related to study abroad programs.

As a larger issue, several panelists pointed out that students’ actual COA can be significantly different from the published COA, based on the program in which they enroll (e.g., engineering versus humanities). When it comes to reporting data in the SFA component, institutions are required to report financial aid data for all full-time, first-time students, which raises concerns that differential tuition, as well as study abroad, can have a substantial effect on the calculated net price. However, others argued that allowing institutions to exclude nonrepresentative program costs from the published COA introduces additional subjectivity into pricing data that are already prone to variation. The panel suggested that further study may be helpful to better understand the current methods institutions use to calculate average COA, to assess whether the average COA data are representative of institutions’ pricing, and to consider how a baseline method for calculating averages costs would impact institutions, particularly with respect to net price calculations as defined in current legislation.

Discussion Item 4: Impact on Finance Categories

E12 FTE is used in conjunction with reported revenues and expenses from Finance. For example, finance data per FTE appears in the Data Center Institutional Profile, Data Center Derived Variables (e.g., instruction expense per FTE), and Data Feedback Reports and is used to determine Title III and Title V eligibility. Title III and Title V are grants to minority-serving institutions. Eligibility is determined by whether an institution has a Pell Grant percentage higher than the median for its peer group or core expenses per FTE lower than the average for its peer group. Additionally, media and policy makers use financial data per FTE when discussing instructional costs per student.

Most of the data collected in the IPEDS Finance component align with information reported on institutions’ audited financial statements. However, the Scholarships and Fellowships section of the IPEDS Finance component is not based on financial statements and collects information about the amount of resources received that are used for scholarships and fellowships. Scholarships and fellowships include grants-in-aid, trainee stipends, tuition and fee waivers, and prizes to students by the institution, including Pell grants. Funding can come from federal, state, local, or institutional sources. Panelists discussed the following scenarios:

- If aid awarded to study abroad students *is not included* in the Scholarships and Fellowships section of the IPEDS Finance component, separating out the aid for study abroad students would require additional burden on the institution.
- If aid awarded to study abroad students *is included* in the Scholarships and Fellowships section of the IPEDS Finance component but study abroad students *are not included* in the institution’s enrollment counts, this would increase the disparity between the IPEDS Finance data and IPEDS enrollment data.

- If aid awarded to study abroad students *is included* in the Scholarships and Fellowships section of the IPEDS Finance component and study abroad students who are not enrolled at the institution but are taking courses for credit *are included* in the institution’s enrollment counts, the institution’s student FTE enrollment will increase, but the resulting aid per FTE measures will look lower (or different) based on the inclusion of more FTEs in the denominator.

Under the proposed guidance, institutions are instructed to count students who are not enrolled at the institution but are taking courses for credit. Several panelists pointed out that the resulting per FTE measures will be more accurate because the institution provides instruction to the students, but does not process or award the aid for students who are not enrolled.

Panelists discussed several different approaches for aligning IPEDS Finance data for study abroad students and their enrollment, such as counting the amount of aid that flows through the institution or tracking how the home institution bills for students enrolled in an approved or affiliated program. The panel agreed that counting the Scholarships/Fellowships processed by the institution would result in the most clear and consistent measure.

Summary of Proposed Guidelines for Reporting Study Abroad

Table 1 summarizes the proposed guidelines for counting study abroad students for each of the affected survey components.

Table 1. Reporting study abroad students, by home or host institution and IPEDS survey component

IPEDS survey component	Home institution	Host institution
Fall Enrollment	Include as degree/certificate-seeking; include in retention	Include as non-degree/non-certificate-seeking; exclude from retention
12-month Enrollment	Include	Include
Graduation Rates and 200% Graduation Rates	Include	Exclude
Outcome Measures	Include	Exclude
Institutional Characteristics	Exclude cost of attendance	Exclude cost of attendance
Student Financial Aid	Exclude cost of attendance	Exclude cost of attendance
Finance	Include in FTE and scholarships/fellowships processed by the institution	Include in FTE and scholarships/fellowships processed by the institution

Definitions:

Home institution—student is seeking a degree or certificate at that institution.

Host institution—student is visiting and taking courses for credit, but not seeking a degree or certificate at the host institution

Panelists suggested that NCES consider including this table in the instructions to provide illustrative examples of how to count any student enrolled for credit.

Next Steps and Reporting Implications

Once the TRP summary comment period has closed, RTI will review the comments and outline recommendations for NCES based on the outcome of the TRP meeting and subsequent public comment period. NCES will review the recommendations to determine next steps and any reporting

implications for IPEDS. Proposed burden estimates will be submitted to OMB for information collection clearance. The current collection expires in December 2016.

Comments

RTI is committed to improving the quality and usefulness of IPEDS data as well as strategies that might be helpful in minimizing additional institutional reporting burden. We encourage interested parties to send any comments or concerns about this topic to Janice Kelly-Reid, IPEDS Project Director, at ipedsTRPcomment@rti.org by September 10, 2015.