

Report and Suggestions from IPEDS Technical Review Panel #51: Gender

SUMMARY: The Technical Review Panel engaged in a substantive discussion on the collection and reporting of gender data in IPEDS. Areas of focus included the purpose and intended uses of data on gender, current practices, and possible suggestions for changes that could be considered for the data collection. This summary provides feedback on the institutional capacity to collect and report data on gender and identifies topics for further research. Comments from interested parties are due to Janice Kelly-Reid, IPEDS Project Director at RTI International, at ipedstrpcomment@rti.org by February 3, 2017.

On October 25 and 26, 2016, 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 51 was to engage the postsecondary community in initial conversations on collection and reporting of gender data. The panel consisted of 49 individuals representing institutions, researchers, state governments, the federal government, higher education associations, and other experts. *Ideas and suggestions raised by the panel are for informational purposes. NCES will work with federal agencies and within any appropriate legislation which might provide future final guidance with respect to collecting and reporting information on sex and gender identity. The work from this information-gathering TRP is intended to serve as a resource for informing such future guidance.*

Background

IPEDS is a series of 12 interrelated survey components connected annually by the U.S. Department of Education (ED)'s National Center for Education Statistics (NCES), designed to help NCES meet its mandate to report full and complete statistics on the condition of postsecondary education in the United States. As an administrative data collection, IPEDS collects institution-level data from every college, university, and technical and vocational institution in the United States and its jurisdictions that is eligible to participate in federal student aid programs.¹ NCES uses IPEDS data in Institute for Education Sciences (IES) publications and annual reports to Congress. IPEDS also forms the institutional sampling frame for other NCES postsecondary surveys, such as the National Postsecondary Student Aid Study (NPSAS). In addition, Congress, federal agencies, state governments, education providers, professional associations, private businesses, media, students, parents, and others rely on IPEDS data for a wide variety of purposes.

RTI convened this TRP to engage the community in an information-gathering discussion on gender data in IPEDS. A primary objective of this informational TRP was to gain a better understanding of the current methods postsecondary institutions use to collect sex and gender data, what categories

¹ The Higher Education Amendments of 1992 make the submission of data to IPEDS mandatory for any institution that participates in or is an applicant for participation in any federal financial assistance program authorized by Title IV of the Higher Education Act of 1965, as amended.

they use, and how they report this information to IPEDS. To this end, the panel was asked to discuss the collection of gender data in the context of institutional capacity and data needs. Background on this topic was informed by a review of current guidance on gender unknown in IPEDS; conversations with IPEDS data providers; and examples of recent efforts from ED² and other federal agencies³, research groups⁴, and postsecondary institutions on the subject of gender identity. For the reader's convenience, this document references websites and reports that provide information maintained by other entities.

Discussion Item #1: Clarify Data Sought – Sex or Gender

IPEDS collects student data by gender in five survey components: Fall Enrollment, 12-month Enrollment, Admissions, Completions, and Graduation Rates, as well as staff data by gender in one component: Human Resources. Within these components, gender is reported using two categories: male or female. NCES uses demographic data from IPEDS in several reports that provide descriptive statistics on students and staff in postsecondary education. As part of its annual reports program, NCES issues two congressionally mandated reports – the *Condition of Education* and the *Digest of Education Statistics* – and uses *sex* (male and female) to present IPEDS data on gender. IPEDS guidance does not define *sex* or *gender* or the categories in which this information is collected (men and women). Sex and gender are two distinct concepts: working definitions provided by the World Health Organization note that *sex* refers to the biological and physiological characteristics that are used to define men and women (male and female are sex categories), while *gender* refers to the socially constructed set of roles, behaviors, and characteristics of women and men.⁵ The panel was asked to review and provide feedback on the terminology used in IPEDS and whether data that is measured as *gender* in IPEDS could be more accurately described as *sex*.

Lack of clarity in data and terminology. Panelists noted that ambiguity in the intended measurement concept (i.e., sex or gender) contributes to confusion about what the data actually represent (i.e., sex, gender, or both). Currently, no clarity exists in the ways in which institutions report gender/sex to IPEDS. To be more precise, institutions vary in how (or if) they distinguish between gender and sex in their systems and it is unclear if data they report to IPEDS is collected using a system predicated on the “male” and “female” binary or is actually self-identified gender. This poses a problem that cannot be fixed by simply relabeling IPEDS survey categories.

Conflation of two very different terms. Panelists noted that IPEDS conflates sex and gender by using the terms interchangeably. If IPEDS were to use sex instead of gender moving forward, this

² 20 U.S.C. §§ 1681-1688; Dear Colleague Letter: Transgender Students (May 13, 2016), www.ed.gov/ocr/letters/colleague-201605-title-ix-transgender.pdf; Office of Elementary and Secondary Education, Examples of Policies and Emerging Practices for Supporting Transgender Students (May 2016), <http://www2.ed.gov/about/offices/list/oese/oshs/emergingpractices.pdf>

³ The Office of Management and Budget (OMB) initiated the Federal Interagency Working Group on Measuring Sexual Orientation and Gender Identity in 2015 to begin addressing concerns regarding the availability of data for sexual and gender minority populations and methodical issues in collecting such data. To date, they have released three working papers: https://sites.usa.gov/fcsm/files/2014/04/current_measures_20160812.pdf, https://sites.usa.gov/fcsm/files/2014/04/Evaluations_of_SOGI_Questions_20160923.pdf, https://sites.usa.gov/fcsm/files/2014/04/SOGI_Research_Agenda_Final_Report_20161020.pdf

⁴ In 2011, the Williams Institute at the UCLA School of Law produced a report from a convening of multi-disciplinary and multi-institutional experts to increase population-based data about transgender people and other gender minorities by advancing sex- and gender-related measures for population-based surveys: <http://williamsinstitute.law.ucla.edu/wp-content/uploads/geniuss-report-sep-2014.pdf>

⁵ <http://apps.who.int/gender/whatisgender/en/>

represents a significant change that would need to be addressed through additional guidance or clarification on the appropriate classifications or, more likely, a change in reporting structure. This, in turn, would require a number of institutions to modify their data systems and resurvey students and staff to align with federal standards. In addition, substituting sex for gender would affect interactions with other federal agencies that rely on IPEDS data, particularly with respect to civil rights compliance and federal grant funding allocations.

Discussion Item #2: Purpose of Gender Data

Panelists considered the purpose and current uses of gender data to provide feedback on the extent to which IPEDS needs data on subpopulations beyond the current reporting categories.

Collection at the institution level. Panelists acknowledged the need for institutions to have demographic data that accurately reflects the diverse populations they serve. Data that allows for a broad categorization of gender can help facilitate discussions about policy, resource allocation, and issues that affect traditionally underrepresented populations. Collecting better gender data on admissions forms provides institutions with information needed to track the admissions, retention, and graduation rates of transgender and gender minority students. Administrators can use such data to illustrate the need for targeted resources and other support to better meet the needs of these students. Institutions need staff demographic data for workforce equity purposes. Providing opportunities for individuals to self-identify fosters an inclusive campus climate and demonstrates a commitment to promoting a safe and productive learning and work environment.

Collection at the federal level. Data are needed to produce better information on the demographic characteristics of students and staff, while also monitoring civil rights enforcement and carrying out legislative mandates. Data are needed to record and address equity; that is, ensuring that access, opportunities, and experiences are equitable among students and staff of all genders. NCES coordinates the collection of information and data acquisition activities of the Education Division and the U.S. Department of Education's Office of Civil Rights. Race/ethnicity and gender data by level are necessary for the Office for Civil Rights to perform functions mandated by Title VI and Title IX.⁶ Gender data are also used to allocate funding and to answer policy and research questions. Under NCES reauthorization statutes,⁷ NCES is tasked with "collecting, analyzing, cross-tabulating, and reporting, to the extent feasible...by gender [and] race." Additionally, the *Higher Education Act* of 1965, as amended, requires that NCES make available information about postsecondary institutions, which include enrollment by race and ethnicity, gender, enrollment status, and residency.

Panelists highlighted privacy concerns that could potentially negate the value of such data in a federal administrative data collection. Although the aggregation of data at the institution level removes much of the risk of disclosure, small cell sizes increase the risk of revealing personal or sensitive information about individual students and staff without their consent. Panelists noted

⁶ NCES was mandated by the 1976 amendments (P.L. 94-273) to the 1974 statute (P.L. 93-380) establishing NCES added a provision (later removed) requiring the coordination of the collection of information and data acquisition activities of the Education Division [of HEW] and the Office for Civil Rights [OCR]. NCES and OCR have collaborated since that time, in HEGIS and in IPEDS, for the collection of racial/ethnic data needed for compliance with Title VI of the Civil Rights Act of 1964 (34 CFR 100.6(b)), and regulations implementing Title IX of the Education Amendments of 1972 that require data on gender (34 CFR Part 106).

⁷ The *Education and Sciences Reform Act* of 2002 (P.L. 207-279) established the National Center for Education Statistics (NCES) within the Institute of Education Sciences (20 U.S.C. 9541) and gives NCES a broad set of collection powers to fulfill the Congressional mandate to report full and complete statistics on the condition of postsecondary education in the United States.

specific privacy concerns pertaining to students in degree programs with low enrollment, members of racial and ethnic minorities, and students and staff at institutions located in small towns. Releasing data that inadvertently reveals or implies information that is intended to be kept private, such as individual's transgender status, can expose individuals to unintended consequences.

Although IPEDS no longer suppresses data, panelists pointed out that gender is a personally identifying characteristic and would require suppression, should this level of detail be reported at the federal level. Privacy issues are further compounded when considered in the context of a federal student unit record system. Given these concerns, panelists questioned whether the NCES sample surveys, such as the National Postsecondary Student Aid Study and the Beginning Postsecondary Students Longitudinal Study, might be better vehicles to collect self-reported gender information from respondents while also allowing NCES to meet its requirements for reporting by race/ethnicity and gender. However, panelists also acknowledged that IPEDS serves as the sampling frame for these surveys and suggested that further research should explore the impact of data for small population groups.

Discussion Item #3: Definitions for Collection

The panel was asked to provide input on what data are imperative in IPEDS to meet the postsecondary data needs of the federal government and data users, while at the same time recognizing the diversity of the population and the desire to accommodate more inclusive terms. The panel focused specifically on the collection of such data in the context of a federal administrative data collection.

Sexual orientation data. Sexual orientation can be measured in three dimensions: sexual identity, sexual attraction, and sexual behavior. Panelists acknowledged that sexual orientation is an important area for research but raised concern with its application in required federal administrative data collection. A combination of 1) the lack of a federal legislative mandate for collecting this data; 2) concern regarding the privacy of both students and staff; 3) potentially small cell size; and 4) concern with requiring the disclosure of sexual orientation to the federal government all contribute as supporting reasons why sexual orientation should not be pursued for IPEDS at this time. Should the collection of sexual orientation measures become a federal mandate, a separate TRP should be convened to gather input from the postsecondary community.

Gender identity data. Gender can be measured in several dimensions, including gender identity and gender expression. Gender identity, or an individual's self-identified sense of gender, may or may not correspond to one's sex assignment at birth. Panelists noted that in general, it is individuals' gender identity (rather than sex) which govern their experiences on campus. They identified gender identity at the time of reporting as the preferred measure for IPEDS, particularly if the purpose of gender data is to address equity and identify barriers in higher education. They also noted personal needs for recognition; collecting gender identity grants individuals the autonomy in how they are represented in an administrative collection.

Panelists noted that gender identity is an inherently complex concept with many distinct categories in which individuals identify. The challenge is defining gender identity for federal reporting while also acknowledging that identity is a dynamic construct that may change over time. Panelists suggested that should IPEDS collect data on gender identity, clear and consistent definitions are needed to ensure data integrity. Further study is needed to address existing definitions that could be adapted to fit for IPEDS purposes. Panelists suggested that any changes to the categories or definitions in IPEDS should be the product of a federal interagency collaborative effort; and when possible,

changes to IPEDS should also be implemented uniformly across state longitudinal data systems and elementary/secondary administrative data collections.

Discussion Item #4: Institution Methods

Panelists discussed common methods institutions use to collect, store, and report gender data. Discussion focused on two primary areas of concern: gender data in IPEDS are limited to the male and female categories; and the current guidance for handling the reporting of individuals for whom gender is unknown.

Collection methods. Panelists shared examples of methods institutions use to administer the collection of gender/sex data to highlight the range of current practices. In general, methods differed on exactly what data are collected, whether data are collected at initial application or registration, methods for updating or changing gender identity on student and employment records, and what data are connected to enrollment and employment records. Collection methods include (but are not limited to) the following examples:

- **Collect sex; report sex.** Institutions collect data in binary sex categories male and female -- a choice that may not accurately reflect an individual's gender identity – and use sex for federal reporting purposes. Sex itself is not a single, indivisible term and can refer to sex assigned at birth or current legal sex; the framing of the question varies by institution. Panelists noted that sex at birth does not address or accurately reflect individuals who legally change their sex.
- **Collect sex and gender identity; report sex.** Institutions collect sex using the binary of male and female and preferred pronoun or self-identified gender (e.g., through opt-in categories in which individuals who do not identify as either male or female can describe how they identify). A number of institutions include optional questions related to gender identity on applications and admissions forms, either by adding this question to their own application materials or collecting data through the Common Application or Universal College Application. The Common Application, with more than 600 member colleges, is used by more than one million applicants. The Universal College Application is smaller in coverage but useful to more colleges that have sought an alternative to the Common Application. Both include options for individuals to self-identify their gender.
- **Collect sex and gender; report on gender (when possible).** Recommended approaches by the Williams Report and Federal Interagency Working Group for collecting demographic items include a measure for gender identity that are: a two-step protocol that involves querying gender identity and sex as separate questions or a modified one-variable option to collect gender/sex in the same question. Some institutions expand the two-step protocol to include a sexual orientation question in addition to a gender/gender identity question. Institutions report individuals to IPEDS in the category that most closely matches their gender identity or are classified as gender unknown and subsequently reported to IPEDS in either the male or female category.

Response options vary with respect to the level of detail in which institutions capture data on gender/sex. In some cases, gender classifications are neither mutually exclusive nor exhaustive; some institutions allow respondents to select multiple gender options (i.e., all that apply).

Storing methods. Institutions also have varying capacities to store gender data in enterprise resource planning systems, student record systems, or human resources platforms. The source of gender/sex data are typically student applications, staff job applications, and personal data updates from continuing students and staff in self-service portals. Although several panelists noted that modifications to software were relatively easy to implement at their campuses, the replication of information and maintenance is often more complex for comingled data from multi-campus sources in a merged data base. Some institutions that capture individuals' preferred gender designation, such as preferred name and pronoun use this information locally and store it separately from current legal sex; panelists described using frozen census files to assign gender for IPEDS reporting, which requires manual data entry to address longitudinal changes. They also noted that some institutions maintain administrative data for students and staff in separate databases that are governed by different campus offices. Coordinating across campus offices to retrieve data may be difficult particularly if offices sequester the data behind a firewall.

Reporting methods. Institutions use a variety of methods to address missing gender when reporting to IPEDS. As noted, IPEDS guidance prescribes that individuals who do not elect or identify either male or female (i.e., gender unknown) are still to be included in IPEDS in order to report or match the total counts. Panelists acknowledged that the practice is intended to ensure the completeness of data for statistical purposes. Institutions have the discretion to decide how best to handle reporting; common methods include: 1) apportioning unknown evenly among categories of men and women; 2) proportional assignment based on known ratios of men and women; 3) reporting all instances of unknown gender in one of the two categories; 4) using the individual's name to determine gender; and 5) random assignment. IPEDS data providers have expressed their unease with assigning an individual's gender for IPEDS reporting and have requested additional guidance from NCES on the appropriate classification for gender unknown.

Panelists pointed out that legitimate unknown (did not respond) and responses that do not fit within the male or female categories (unable to respond) represent two distinct reasons for nonresponse; conflating the two is problematic. The arbitrary assignment of individuals into gender categories erases an important dimension of identity for individuals who indicate an identity other than male or female and systematically excludes these individuals from the data analysis. Panelists expressed strongly that IPEDS should discontinue the practice of instructing institutions to allocate gender unknown into the current categories.

Discussion Item #5: IPEDS Survey Items

The panel identified "gender unknown" as an area where changes to the current reporting method could improve the quality of the gender data reported to IPEDS. Though the number of individuals whose gender is unknown represents a small fraction of the population and varies by institution, panelists projected that gender unknown is expected to increase at their campuses going forward. They considered several ways to address gender unknown to overcome the need for institutions to assign gender, but were unable to reach a conclusion on a single clear solution. Panelists advised that the lack of a definitive solution should not be interpreted as an attempt to maintain the status quo; rather it illustrates the complexities of this topic and the need for further study. The panel discussed the following possible suggestions for modifying or altering the current methods of collecting gender data in IPEDS and identified barriers to implementing these changes. These issues cannot be resolved independently by the TRP, but would need to be part of a larger conversation with the higher education community and coordination on the part of the federal government.

- **Include gender unknown in the aggregate totals but not in the detail (report gender data using the current two categories).** This approach would apply the same logic as the guidance for gender unknown in the Admissions survey component. Meaning individuals whose gender is unknown would be included in the totals, but not the detail. The men and women categories do not need to sum to the total (thereby creating a de facto unknown category).
- **Add category for reporting gender unknown (report gender data using the current two categories + one remainder category for “unknown”).** IPEDS survey forms use federally standardized race/ethnicity categories and include an unknown category for reporting individuals whose race/ethnicity is not known. The panel considered adding a similar category for reporting individuals whose gender is unknown. If a gender unknown category is added, IPEDS should implement an automatic edit check to flag high percentages of gender unknown data; to add further transparency, institutions would be prompted to provide an explanation for the reported data or indicate the question wording and response options used to collect gender.
- **Add category to accommodate gender identity in categories other than male or female in a separate category from gender unknown (report gender data using the two current categories + one new aggregate reporting category + one remainder category for “unknown”).** Meta-analysis by the interagency working group suggests that item-level nonresponse among sexual orientation and gender identity questions is based on characteristics that are of consequent statistical importance.⁸ To address concerns with conflation in the gender unknown category, the panel considered separating the unknown category into two separate categories: an unknown category to strictly include nonresponse (did not respond) and an additional, distinct category for reporting individuals who do not identify as either male or female.

The primary issue with any approach that uses a category for unknown (either as a de facto unknown category or as a separate reporting category) is that the current reporting structure does not accommodate gender unknown when reporting data involving the construction of cohorts. For example, the Graduation Rates survey component draws from the Fall Enrollment survey component’s full-time, first-time degree/certificate-seeking undergraduate students, where students are reported by race/ethnicity and gender. Students who are not reported in one of the gender categories (men, women) in the Fall Enrollment component would not be reflected in the initial cohorts of students by race/ethnicity and gender that are preloaded as the denominator for reporting graduation rates. Panelists noted that excluding students whose gender is unknown runs counter to the goal of counting all students in IPEDS, particularly in the context of student success and completion. Further investigation is needed to address the impact of this change on affected survey components and how this approach would affect compliance with the provisions of the *Student Right to Know and Campus Security Act* of 1990 and regulations implementing Title IX that require data by gender.

Panelists also cited issues regarding changes or updates to gender between the establishment of an initial cohort and subsequent data collections (i.e., graduation rates). Given that IPEDS captures data at a single time-point, and gender can be a dynamic construct which may change over time, IPEDS

⁸ “Evaluations of Sexual Orientation and Gender Identity Survey Measures: What Have We Learned” by the Federal Interagency Working Group on Improving Measurement of Sexual Orientation and Gender Identity in Federal Surveys, 2016. https://sites.usa.gov/fcsm/files/2014/04/Evaluations_of_SOGI_Questions_20160923.pdf

needs to consider: 1) the time at which gender data are initially collected; 2) when or if the data should be recollected, and the period of such recollections; and 3) the way in which shifts in gender over time should be dealt with. These considerations extend to students as well as staff. Within IPEDS, tracking data longitudinally for a given student cohort is an important component of graduation rates; panelists underscored that at each time-point at which gender is collected, the measure should be framed as “current gender identity.” Current research on gender identity has not reached consensus on commonly accepted best practices or definitions for collecting gender identity. Further study is needed to examine the appropriate terminology and response options if gender identity is added to IPEDS.

The costs and associated burden with changes were a concern to panelists. Adding just one additional gender category would increase the number of gender-related data collection cells by 50 percent, affecting race/ethnicity data collection for the student survey components and the human resources survey component. This would result in a change to the manner in which institutions enter and store data in their student and staff information systems. Retrieving data from software systems that do not easily allow for additional customization may be difficult, particularly if systems are unable to store multiple self-selected gender options or accommodate changes to gender identity. Panelists were unsure about costs or capacity for software vendors to update their systems or accommodate custom modifications for new gender categories without federal definitions. Burden is associated not only with adding a patch or new fields in software systems to accommodate such change, but also with ongoing burden of data governance and reconciling data collected under different reporting guidance.

Guidance on gender unknown. As a more immediate solution, the panel suggested that IPEDS should provide guidance to help institutions reduce the level of unknown and collect more accurate demographic data. This could include strategies for addressing nonresponse, such as follow-up surveys for individuals with missing gender data.

Additional categories for aggregate reporting. Statistical reliability becomes an issue when data are collected for small subpopulations and panelists pointed out that data on transgender and other gender minority populations in IPEDS would likely be reported in cells too small to disclose for privacy reasons. However, panelists noted that institutions have latitude to collect data in more detailed categories to the extent necessary to best serve their populations. Just as institutions are permitted to use subcategories when surveying their students on race/ethnicity, so too could institutions collect subcategories of gender, provided they can be rolled up or aggregated to the IPEDS reporting categories. This approach would help meet the data needs of institutions and allow students to be “counted” in categories that represent their identity.

Next Steps

NCES will continue to have representation in the Federal Interagency Working Group on Measuring Sexual Orientation and Gender Identity and also work with federal agencies and legislation which might provide future final guidance. There are no proposed changes to current IPEDS reporting requirements as a result of this TRP. The work from this informational-gathering TRP will be used as a resource when such future guidance may be issued.

Comments

RTI is committed to improving the quality and usefulness of IPEDS data as well as strategies that might be helpful in minimizing additional 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 February 3, 2017.