

Report and Suggestions from IPEDS Technical Review Panel #52: 2017 Subbaccalaureate Certificates

SUMMARY: The Technical Review Panel discussed the purpose and classification of subbaccalaureate certificates in IPEDS and considered potential changes to the Completions component to reflect the current postsecondary landscape. This summary provides feedback on how changes would affect data quality and reporting burden for institutions. Comments from interested parties are due to Janice Kelly-Reid, IPEDS Project Director at RTI International, at ipedstrpcomment@rti.org by June 12, 2017.

On March 28 and 29, 2017, 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 U.S. Department of Education.

RTI's specific purpose for TRP 52 was to discuss potential classifications to capture the growing category of subbaccalaureate certificates¹ in the Completions survey component and how these changes would impact stakeholders including institutions, researchers, and the Department of Education. The panel consisted of 56 individuals representing institutions, researchers, state governments, the federal government, higher education associations, and other experts.

Background

The IPEDS Completions component collects data on awards conferred in postsecondary education programs and the number of students who earned the awards (see page 2 sidebar). The data reflect all "formal awards," including subbaccalaureate certificates, conferred or received during a 12-month period, as reported by participating institutions.² Institutions of all sectors offer subbaccalaureate certificates which can range in length from a few months to over 3 years; however, most are awarded by public 2-year institutions and for-profit institutions (2-year and less-than-2-year institutions).

The National Postsecondary Education Cooperative (NPEC)³ convened a working group to examine the subbaccalaureate certificates data reported to IPEDS.⁴ The 2012 NPEC report *Defining and Reporting Subbaccalaureate Certificates in IPEDS* identified several challenges and differences in

¹ Although IPEDS collects data on postbaccalaureate and post-master's certificates, the scope of this TRP review is limited to undergraduate certificates.

² The completion of all IPEDS surveys is mandatory for institutions that participate in or are applicants for participation in any federal student financial aid program (such as Pell grants and federal student loans) authorized by Title IV of the Higher Education Act of 1965, as amended (20 USC 1094, Section 487(a)(17) and 34 CFR 668.14(b)(19)). More than 7,500 institutions complete IPEDS surveys each year. These include research universities, state colleges and universities, private religious and liberal arts colleges, for-profit institutions, community and technical colleges, non-degree-granting institutions such as beauty colleges, and others.

³ NPEC was established by NCES in 1995 as a voluntary organization that encompasses all sectors of the postsecondary education community including federal agencies, postsecondary institutions, associations, and other organizations with a major interest in postsecondary education data collection.

⁴ Sykes, A. (2012). *Defining and Reporting Subbaccalaureate Certificates in IPEDS* (NPEC 2012-835). U.S. Department of Education. Washington, DC: National Postsecondary Education Cooperative. Retrieved from <http://nces.ed.gov/pubs2012/2012835.pdf>

institutional practices for reporting certificates to IPEDS. Subbaccalaureate award criteria and program requirements can vary across (and sometimes within) institutions. For example, some institutions report all program completions regardless of whether the program was provided for credit. Some institutions embed short-term certificates within a longer-term certificate or degree program and award incremental or “stacking” certificates in the process of earning the other (terminal) credential. Other reasons for reporting variability include differing institutional interpretations of terms associated with reporting requirements (e.g., that only state-reviewed programs are considered formal), a perceived credit minimum for reporting certificates, and a belief that only credentials earned within Title IV-eligible programs should be reported.

NPEC commissioned a research paper in 2016, *Collecting and Disseminating Data on Certificate Awards*⁵ to identify trends in the postsecondary certificate landscape and assess the extent to which the IPEDS Completions data reflect those trends. In 2013-14, Title IV institutions awarded more than 1 million subbaccalaureate certificates, an increase of 84 percent over 15 years from about 547,000 in 1998-99.⁶ Much of the growth was in awards for programs of less than 1 year and 1 to 2 years, both of which increased by 88 percent over the 15-year period. The growth represents not only an increase in new short-term certificate programs but also a change in program structure for emerging alternative credentialing awards such as stacked credentials and micro-credentials. In addition, although certificates are traditionally thought of as occupational/vocational in nature (commonly awarded certificates include those in healthcare, cosmetology, and trades such as auto mechanics), many new types of certificates are emerging that are more academic in nature.

As noted in the 2016 NPEC paper, the Completions component generally performs well at capturing traditionally structured career-oriented certificate programs; however, institutions face challenges when attempting to categorize emerging types of certificates, such as stacked credentials and transfer certificates. Many of these developing certificate programs fall under the less-than-1-year certificate program category, which may result in inaccurate reporting of data on the Completions component. Not only do the short-term certificate data represent different types of certificates, many also are duplicative across students, who can receive several certificates in a single postsecondary program.

IPEDS Completions Component

Background: The Completions component meets data collection and reporting requirements as outlined in federal higher education and civil rights legislation. The data also help satisfy the mandate in the *Carl D. Perkins Vocational Education Act* for information on completions in postsecondary career and technical education programs. In addition to use within NCES and the Department of Education, Completions data are used by a variety of audiences to respond to a range of specific educational and public policy issues, such as postsecondary degree and certificate attainment levels, manpower planning projections, labor market outcomes, and programmatic comparisons.

Purpose: The Completions component collects data each fall on the number of awards conferred by postsecondary institutions during the previous 12 months. The awards reported range from sub-baccalaureate certificates to doctor's degrees and must be formal credit awards conferred by the postsecondary institution as the result of completion of an academic or occupational/vocational program of study. Data are collected on the race/ethnicity and gender of recipients for each award level within each program of study (as defined by the Classification of Institutional Programs (CIP) code system). The Completions component also collects information on the availability of programs that can be completed entirely through distance education as well as information on program completers by age, race/ethnicity, and gender.

⁵ Miller, A., Erwin, M., Richardson, S., Arntz, M. Collecting and disseminating data on certificate awards (NPEC 2016). U.S. Department of Education. Washington, DC: National Postsecondary Education Cooperative. Retrieved from <https://nces.ed.gov/ipeds/resource/download/NPECCertificateAwardsData.pdf>

⁶ Source: IPEDS Completions survey component, 1998-99, 2013-14.

RTI convened this TRP to engage the higher education community in a discussion about the purpose and classification of subbaccalaureate certificate programs in IPEDS. The TRP was asked to review the recommendations from the NPEC paper and consider potential changes to certificate classifications within the context, limitations, and implications of institutional-, state-, and federal-level policy and programming. Background on this topic was informed by the exploratory NPEC-commissioned research, an example of state-level research⁷, and a review of the Completions component.

Discussion Item #1: Certificate Definition

Common elements from external definitions. The panel reviewed the IPEDS definition of certificate and considered whether the current guidance is appropriate or would benefit from any changes. For example, IPEDS does not specify the length of certificates (e.g., minimum credit or clock hour requirement), nor does it state that certificate programs must be career-oriented, though these were common elements found in definitions used by other federal agencies and other emerging datasets. Panelists acknowledged that inconsistencies in the data suggest a need for greater clarity in the reporting requirements; however, they also recognized that imposing a credit or clock hour minimum would greatly reduce the total number of certificates reported each year. In addition to breaking trend lines, imposing a minimum would invalidate legitimate programs that count toward state and national completion goals; limit data needed to measure capacity to meet local workforce demands; and exclude many certificates with high economic value (e.g., a commercial truck driving certificate) from the analysis. Additionally, panelists raised concern that a standard federal minimum threshold imposes an arbitrary measure and would affect alignment with states and systems that already have a defined minimum credit threshold established as part of a formal review process for approving certificate programs. Panelists further noted that incorporating career-oriented or occupation-focused indicators into the IPEDS definition would exclude many new types of certificates that are more academic in nature (notably, transfer certificates that are institutionally recognized as academic certificates).

Given the risks inherent in modifying definitions, the panel agreed that rather than adopting new elements or an alternative definition, clarifying the IPEDS definition and including more specific inclusionary and exclusionary language in the instructions would better improve the quality of subbaccalaureate certificate data.

IPEDS definition. Panelists agreed that only formal awards should be included but noted that defining “formal award” would be difficult to convey and implement. In general, a formal award refers to an award granted in recognition of successful completion of a program of courses that has been approved by the governing body of the institution. Although the specific approval requirements vary across institutions, the approval process generally includes a curriculum review, after which the award for completion of the program is eligible to be recorded on a student’s transcript. Panelists suggested deleting “formal” from the definition and adding language to clarify that the award must be institutionally recognized by the appropriate governing body for that institution.

⁷ Legislative Program Review and Investigations Committee. *Higher Education Certificate Programs* (2014). Legislative Program Review and Investigations Committee. Hartford, CT: Retrieved from <https://www.cga.ct.gov/pri/docs/2014/Final%20Higher%20Ed%20Certificate%20Report%20for%20PUBLICATIO%20N.pdf>.

Completions component instructions—what to include. For the same reasons, panelists suggested striking “formal” from the instructions on what to include. They also suggested adding an FAQ to clarify certificates eligible to be recorded on students’ transcripts should be included (this is a typical characteristic of institutionally recognized credit-bearing programs of study).

Completions component instructions—what to exclude. Although the clarification to the definition and instructions addresses much of the variability of the certificates reported within the subbaccalaureate categories, panelists agreed that more specificity on exclusions would help reduce additional reporting inaccuracies. For example, noncredit programs to prepare students for basic skills, including English for nonnative speakers, and other general remedial skills should be excluded but are commonly reported. Panelists suggested striking the reference to “informal” from the instructions (a parallel change to the suggestion to strike “formal” from the instructions) and adding the following examples to the list of awards to exclude:

- ESL
- Developmental/college preparatory
- Noncredit

The reference to “transfer” in the exclusionary criteria is no longer applicable, given the suggested change to the certificate definition.

Discussion Item #2: Classifying Less-Than-1-Year Programs (Program Length)

Subbaccalaureate certificates are reported to IPEDS in three categories based on the program length, and measured in terms of academic year, with a clock and credit hour equivalency. Completions component instructions provide guidance to help institutions classify program length. Table 1 summarizes those instructions.

Table 1. IPEDS subbaccalaureate certificate award levels by program length

Program Length	Award level		
	1 (<1 year)	2 (1 to < 2 years)	4 (2 to < 4 years)
Semester/trimester hours	<30	30–59	60+
Quarter hours	<45	45–89	90+
Clock hours	<900	900–1,799	1,800+

Source: 2016-17 Instructions for the IPEDS Completions Component.

<https://surveys.nces.ed.gov/ipeds/VisInstructions.aspx?survey=10&id=30080&show=all>.

As noted in the 2016 NPEC paper, the less-than-1-year certificate has become a catch-all category for emerging alternative credentials such as stackable certificates and industry credentials. The panel considered possible alternatives to the classification system to appropriately measure less-than-1-year programs and suggested the following.

Eliminate year parameters. Institutions award certificates for programs with credit and contact hour requirements that vary widely, particularly for programs reported in the less-than-1-year category. For example, awards for very short programs of 3 semester hours and for longer programs of 29 semester hours are both reported as less-than-1-year certificates. Panelists commented that the academic year length is meant to provide context, but was being used as a proxy to imply academic content length or as a qualifier for time to degree. Given the variation within the length of short-term

programs, panelists suggested eliminating the academic year parameters and using program length by credit or contact hours to report award level 1 subbaccalaureate certificates.

Subcategorize short-term certificates. Panelists expressed concerns regarding potential unintended consequences of imposing a minimum credit threshold, but also acknowledged that the wide range of lengths within the less-than-1-year category limits the utility of the data. They suggested bifurcating, or subcategorizing, the less-than-1-year programs by the length of instructional content (credit/contact hour activity), as shown in Table 2. Justification for the suggested thresholds is labor market impact and alignment with gainful employment regulations.⁸

Table 2. Proposed conversion table for IPEDS subbaccalaureate certificate award levels

Program Length	Award level			
	1		2	4
	1A	1B	(1 to < 2 years)	(2 to < 4 years)
Semester/trimester hours	1–8	9–29	30–59	60+
Quarter hours	1–12	13–44	45–89	90+
Clock hours*	1–299	300–899	900–1,799	1,800+

*Clarify weeks in instructions for applicable programs.

Discussion Item #3: Title IV Eligible Certificates

The Completions component does not specify that programs must be Title IV eligible. To qualify for federal financial aid eligibility, programs must be accredited by an approved accrediting body, be authorized by the state to operate, and admit students with a high school diplomas or GED (or beyond the age of compulsory school attendance). For programs that lead to an associate’s, bachelor’s, professional, or graduate degree, there are no minimum length requirements. Non-degree programs, in addition to meeting criteria for accreditation, state authorization, and student admission, must meet certain length requirements and prepare students for gainful employment in a recognized occupation. Short-term programs, which are eligible for Title IV Federal Stafford loans, require at least a minimum of 300 clock hours and cannot exceed 599 clock hours. Undergraduate programs that are at least 600 clock hours (or 16 semester/24 quarter hours) are eligible for any type of Title IV aid available, including Pell grants. The panel was asked to consider incorporating Title IV eligibility into the Completions component either by subdividing award level 1 to match the program length requirements in the Title IV eligibility guidelines or by limiting Completions data to career-oriented certificate programs of a minimum length.

Panelists acknowledged that subdividing, award level 1 programs to match the Title IV eligibility guidelines would enable data users to recognize the number of certificates awarded in non-Title IV-eligible programs, Title IV grant and loan eligible programs, and loan only eligible programs. Although institutions could identify awards by Title IV programs (grants and loans), reporting completions by race/ethnicity and gender within the CIP and subaward levels would significantly increase the level of detail collected. Additionally, system offices that report IPEDS data would face an increased burden for all programs, for all institutions for which they report.

Panelists noted that some Title IV eligible institutions offer non-Title IV eligible programs because the programs do not meet the minimum length requirements or are not covered by the institution’s

⁸ Information for Financial Aid Professionals (IFAP) 2004-05 Federal Student Aid Handbook, Volume 2, Chapter 4 – Program Eligibility (<https://ifap.ed.gov/sfahandbooks/attachments/0405Vol2Ch4ProgramEligibility.pdf>)

accreditation. Restricting certificates to Title IV eligible programs would greatly reduce the total number of certificates reported each year and underestimate the instructional activity provided by these institutions. They also noted that introducing a program-level Title IV requirement would also run contrary to the suggested clarification to the IPEDS definition of certificates (which would include institutionally recognized transfer certificates and other academic certificate programs not addressed in Federal Student Aid requirements that a program prepare students for gainful employment in a recognized occupation). Rather than introducing program-level Title IV eligibility into the Completions component, panelists suggested adding the following new item:

- Are all certificate programs within the 6-digit CIP and award level by credit:
 - Title IV eligible (all)
 - Non–Title IV eligible (none)
 - Mix
 (Incorporate into all subbaccalaureate certificate award levels 1(a/b), 2, 4 and collect at the CIP level).

Panelists noted that this suggested change provides a comparable institution-level measure of certificate programs that are industry-based (based on a Federal Student Aid requirement that a program prepare students for gainful employment in a recognized occupation) without excluding data that are needed to report on national completions goals, programmatic trends, and the relative student gains realized by each reported completion.

Discussion Item #4: Typology Considerations

The panel considered whether IPEDS should adopt a typology—or taxonomy— of certificates by adding attributes to the data submission. For example, an option for a typology would break out certificate data by certificate type or structure and by certificate content, function, or purpose, as shown in Table 3.

Table 3. Example table for IPEDS subbaccalaureate certificate typology

By certificate type or structure	By certificate content, function, or purpose
Traditional	Career
Diplomas	Academic
Stacked	Basic skills*
Noncredit	Transfer
Industry credential	

*including ESL

Panelists questioned the stability of the categories, citing the changing landscape of certificates within the last decade and the potential for further change in the decade to come. They also noted the complex interrelationships between stackable certificates and questioned whether differentiating stackable credentials from traditional certificates would provide a meaningful or salient measure, and if so, whether the differences could be clearly articulated through a typology of certificates. Panelists acknowledged that stackable certificates are not defined in such a way that can be reported at the federal level and pointed out that once subdivided by credit (as suggested in Discussion Item #2), attempting to draw a distinction between the two becomes less important. Further, several of the categories fall under the types of awards to exclude, as specified in the clarifications to the definition and instructions (as suggested in Discussion Item #1). Panelists also noted the Title IV-eligibility indicator (as suggested in Discussion Item #3) would provide a more meaningful measure of certificate content or purpose, in terms of academic or career. In general, panelists agreed that

introducing certificate typology would add substantial burden with little value; the suggested changes rendered this categorical recommendation inapplicable.

Discussion Item #5: CIP Code Considerations

Given that academic programs do not represent a large share of certificates, and that often these certificates are misclassified as career programs, the panel considered modifying the CIP code system to better categorize certificate programs. As noted in the 2016 NPEC paper, revisions to the CIP code system could be an alternative to a typology.

Panelists noted that any solution modifying the CIP code schema loses a degree of specificity already provided through the 6-digit CIP code. Additionally, changes to the CIP schema would require institutions to restructure databases to accord with the revised structure which would add significant burden. Panelists agreed that there was currently no compelling reason to change CIP code structure to make special accommodations for subbaccalaureate certificates.

Summary of Suggested Changes to the Completions Form

Section	Suggested changes
Glossary: Definition of Certificate	Update and delete “formal” from the definition of certificate: <ul style="list-style-type: none"> • “An formal award certifying the satisfactory completion of a postsecondary education program.” • Include language indicating the award must be institutionally recognized by the appropriate governing body for that institution.
Instructions: What to Include	Strike “formal” from the instructions of what to include: <ul style="list-style-type: none"> • “Formal awards conferred as the result of completion of an academic or occupational/vocational program of study. (Note that only CIP codes describing academic or occupational/vocational programs of study are valid CIP codes on the Completions component). The instructional activity completed as part of the program of study must be credit-bearing, but can be measured in credit hours, contact hours, or some other unit of measurement.” • Awards conferred by the postsecondary institution. • Awards conferred between July 1st and June 30th. • Multiple awards conferred to a single student.
Instructions: What to Exclude	Update instructions on what to exclude. Move “merit,” “completion,” and “attendance” to a new item, examples of awards to exclude (see next item in this table) and strike “transfer”: <ul style="list-style-type: none"> • Awards earned, but not yet conferred. • Awards conferred by branches of your institution located in foreign countries. • Awards conferred by an entity other than the postsecondary institution (such as the state, or an industry certificate). • Informal awards such as certificates of merit, completion, attendance, or transfer. • Awards earned as the result of an avocational, basic skills, residency, or other program not recognized by IPEDS as academic or occupational/vocational. • Honorary degrees.

Instructions: What to Exclude	Update the instructions for what to exclude to include additional exclusion criteria: <ul style="list-style-type: none"> • Examples of awards to exclude <ul style="list-style-type: none"> - Merit - Completion - Attendance - ESL - Developmental/college preparatory - Noncredit 																												
FAQ	Add FAQ to address formal award not showing on transcript.																												
CIP Data Screens	Remove year parameters from award level 1 and add subcategorization of subbaccalaureate programs by the length of academic content (data will be collected at CIP level by gender and race/ethnicity): <table border="1" style="margin: 10px auto;"> <thead> <tr> <th rowspan="3">Program length</th> <th colspan="4">Award level</th> </tr> <tr> <th colspan="2">1</th> <th>2</th> <th>4</th> </tr> <tr> <th>1A</th> <th>1B</th> <th>(1 to < 2 years)</th> <th>(2 to < 4 years)</th> </tr> </thead> <tbody> <tr> <td>Semester/Trimester hours</td> <td>1–8</td> <td>9–29</td> <td>30–59</td> <td>60+</td> </tr> <tr> <td>Quarter hours</td> <td>1–12</td> <td>13–44</td> <td>45–89</td> <td>90+</td> </tr> <tr> <td>Clock hours</td> <td>1–299</td> <td>300–899</td> <td>900–1,799</td> <td>1,800+</td> </tr> </tbody> </table>	Program length	Award level				1		2	4	1A	1B	(1 to < 2 years)	(2 to < 4 years)	Semester/Trimester hours	1–8	9–29	30–59	60+	Quarter hours	1–12	13–44	45–89	90+	Clock hours	1–299	300–899	900–1,799	1,800+
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CIP Data Screens	Clarify weeks in instructions for applicable programs. New item (incorporate into all subbaccalaureate certificate award levels 1(A/B), 2, and 4 and collect at the CIP level): <ul style="list-style-type: none"> • Are all certificate programs within the 6-digit CIP and award level by credit: <ul style="list-style-type: none"> ○ Title IV eligible (all) ○ Non–Title IV eligible (none) ○ Mix 																												

Panelists suggested IPEDS provide updated Completions component survey forms and file import specifications in advance of implementing any changes. Further study is needed on how proposed changes will affect other IPEDS components (e.g., Graduation Rates and Outcome Measures components).

Next Steps

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 submit proposed burden estimates to the Office of Management and Budget for information collection clearance. The current collection expires in 2020.

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 June 12, 2017.