

## **Report and Suggestions from IPEDS Technical Review Panel #42: Defining an IPEDS Institution**

**SUMMARY: The Technical Review Panel discussed issues associated with defining an institution for IPEDS. After a review of the current definition, the panel suggested that TRP 43 continue the discussion and consider such issues as campus reporting and ownership structures (i.e., the way some institutions combine their data to report to IPEDS) and identify the parameters that should drive the definition of an IPEDS institution. Comments from interested parties are due to Janice Kelly-Reid, IPEDS Project Director at RTI International, at [ipedsTRPcomment@rti.org](mailto:ipedsTRPcomment@rti.org) by May 2, 2014.**

On February 11 and 12, 2014, 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 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 42 was to solicit input from the postsecondary education community regarding the definition of an IPEDS institution. The panel consisted of 51 individuals representing institutions, researchers and other data users, state governments, the federal government, higher education associations, and others. The panel was asked to review the definition and process for defining an institution in the IPEDS collection, to consider the impact of changes on stakeholders in the postsecondary education community, and to examine how potential changes would affect reporting to IPEDS and other programs within the Department of Education (ED). Federal staff from appropriate ED programs were invited to attend this meeting of the TRP to identify federal mandates and requirements for collecting postsecondary education data.

TRP 42 is the first in a series of TRP meetings to discuss the definition of an IPEDS institution. The panel considered several different perspectives on IPEDS UnitID and discussed the challenges with the current system. TRP 43 will continue the discussion of the definition and the process for defining an IPEDS institution and will identify any additional implementation questions. TRP 42 suggested that further study be conducted to better inform TRP 43 discussions of both campus structures and ownership structures and how they are represented in IPEDS and other ED programs.

### **Overview**

IPEDS data and other ED data on postsecondary education are used in many ways. These data are used by students and parents to aid in their college search process; by officials at the federal, state, and local levels for policy analysis and development; by institutions for benchmarking and analysis; by researchers to analyze nationally representative samples to examine such issues as persistence and the effects of financial aid on subsequent enrollment; and by professional associations, private businesses, and the media.

The Administration's goal of promoting college value, access, and affordability has resulted in the development of several new initiatives and proposed actions to advance institutional accountability while also enhancing consumer access to useful information. Some of this information will be based

on IPEDS and other federal data collections. While federal legislation and regulations provide the framework for reporting data to IPEDS and other ED programs, separate mandates and regulations within the programs themselves define the metrics. Reporting requirements and definitions of terms may be similar across ED programs, but no official standardization exists. Given the new constructs of delivery of instruction, such as online programs, there is a need to better understand the processes for defining institutions and address the changing higher education landscape.

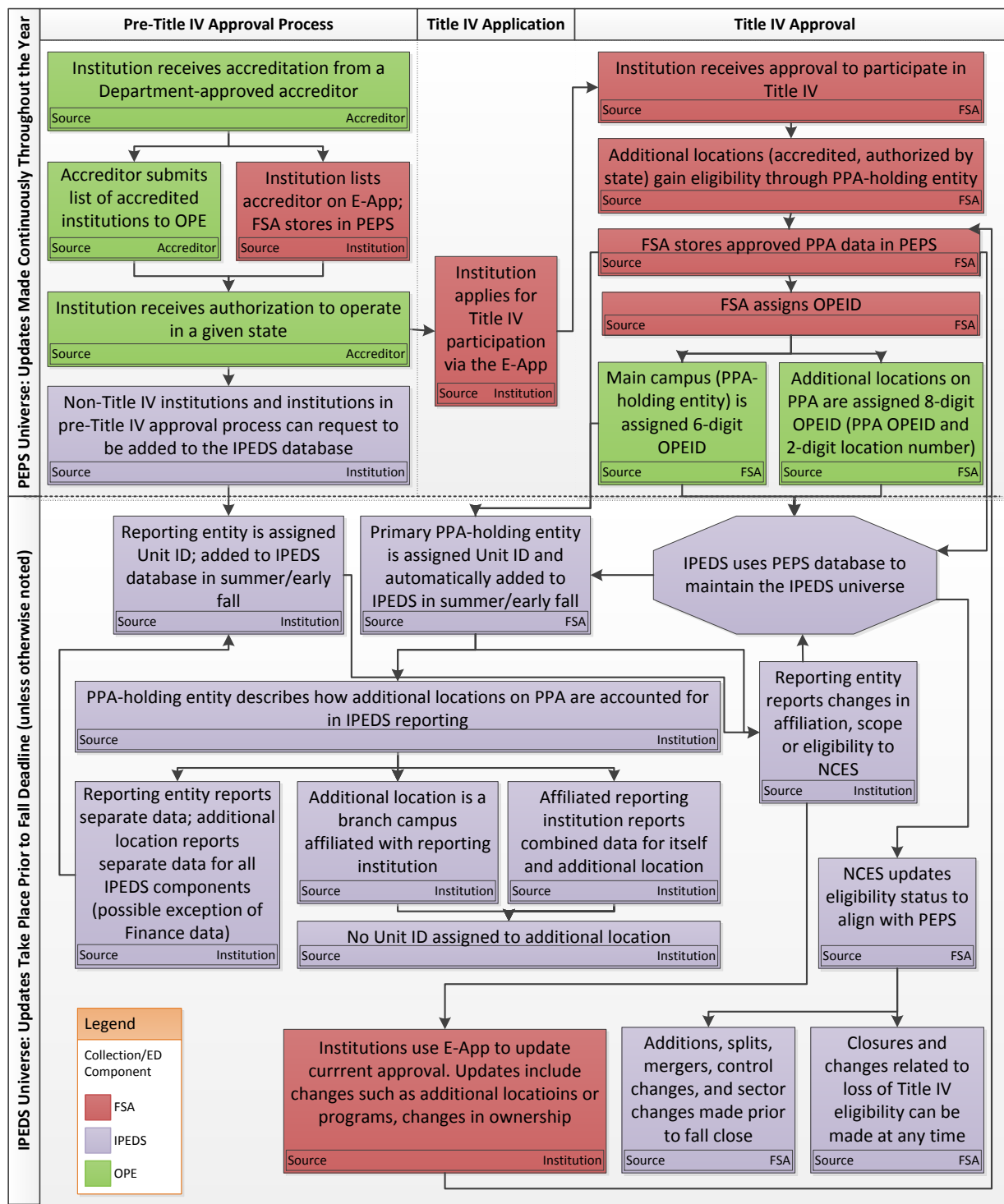
RTI convened this meeting of the TRP to discuss the definition of an IPEDS institution to understand its application in federal initiatives, reporting compliance, and other factors. While an institution is currently defined in IPEDS as having as its sole purpose, or one of its primary missions, the provision of postsecondary education, IPEDS institutions may have a variety of organizational structures, with multiple campus, branches, and vehicles for providing instructions. The panel was asked to consider how the current model allows for the appropriate interpretation of information and what changes, if any, could help more clearly define an IPEDS institution.

### **Defining an IPEDS Institution: Background**

IPEDS collects basic data from postsecondary institutions in the United States and the other jurisdictions that are eligible to participate in federal student aid programs authorized by Title IV of the Higher Education Act (HEA) of 1965, as amended. All postsecondary institutions that have a Program Participation Agreement (PPA) with the U.S. Department of Education's Office of Postsecondary Education (OPE) are required to report data to IPEDS. This agreement allows institutions to participate in federal student financial assistance programs upon compliance with Title IV regulations. Institutions with such an agreement are referred to as *Title IV institutions*. The Office of Federal Student Aid (FSA) uses the Postsecondary Education Participation System (PEPS) to maintain eligibility, certification, demographic, financial, review, audit, and default rate data about schools, lenders, and guarantors participating in the Title IV programs.

While OPE is the basis for the IPEDS universe, non-Title IV institutions may elect to voluntarily participate in the IPEDS data collection. The relationship between the PEPS universe and the IPEDS universe is outlined in Figure 1. With some exceptions, this is generally the flow of events that occur in the systems.

**Figure 1. Relationship between PEPS universe and IPEDS universe**



NOTE: FSA = Office of Federal Student Aid; E-App = online application for postsecondary institutions for approval to participate in the federal student financial aid programs; IPEDS = Integrated Postsecondary Education Data System; NCES = National Center for Education Statistics; OPE = ED Office of Postsecondary Education; OPEID = Office of Postsecondary Education identification number; PEPS = Postsecondary Education Participation System; PPA = Program Participation Agreement; UnitID = unique postsecondary institution number in IPEDS.

The PEPS universe is the collection of main campuses (primary PPA-holding entities) and additional locations (a site other than the main campus where the school is providing instruction) that are eligible for Title IV federal student aid and have been assigned identification numbers by OPE, referred to as *OPEIDs*. The main campus is the primary PPA-holding entity, and its OPEID ends in 00. Additional locations listed on the PPA have 8-digit OPEIDs: the same 6-digit root OPEID as the main campus plus a two-digit location code, from 01 to 99 (except in cases where there are more than 99 additional locations, in which case OPEID may begin with 1-9 and end in 00-99). Additional locations must be reported if a student is able to complete 50% or more of a Title IV-eligible program. Types of additional locations can vary in character. Examples include full-fledged campuses, classroom locations, and even office buildings or hotels where the school provides a program to a limited audience.

For OPE purposes, campus structure is related to accreditation, not necessarily to the administrative organization of the institution, ownership structure, or how the institution is presented to the public. Some information is reported by the main campus only, such as highest level of offering and vocational programs offered; officials and directors; distance education information; third-party services; and foreign gifts. Although some systems allow reporting of student-level data by location, student-level data are only consistently reported by main campuses at this time. Some independently eligible schools have common ownership or administration and submit combined financial statements or combined audits.

Any institution that has a PPA with the Department of Education (i.e., has an OPEID ending in 00) and is primarily postsecondary must be listed as a separate reporting entity in IPEDS and is assigned a unique IPEDS UnitID. Any additional location that shares a PPA with a main campus may be listed as a separate entity in IPEDS if it satisfies the IPEDS definition of a branch campus. For IPEDS purposes, a branch campus is a campus or site of an educational institution that is not temporary, is located in a community beyond a reasonable commuting distance from its parent institution, and offers organized programs of study, not just courses. OPE includes further restrictions, such as that the institution must have its own faculty, its own budgetary and hiring authority, and its own systems/administrative organization (i.e., its own financial aid office, registration system, student record system, and financial accounting system, if possible).

FSA uses OPEIDs and other identification numbers to identify schools or locations in its systems and data collections. Examples of other identification numbers include Federal School Code, Federal Pell Grant Code, Direct Loan Code, and Federal Family Education Loan Code.

### **Challenges Identified by the TRP**

Organizational differences, particularly those related to campus structure, can make it challenging to link data across federal postsecondary data systems. Given that many items in OPE, FSA, and IPEDS are defined in regulations or are otherwise mandated, a complete overhaul of the current processes for defining *institution* would need to be addressed through new legislation. The panel agreed that it is not advisable to undertake a complete restructuring of ED administrative data collections at this time solely for the sake of alignment. Instead, the TRP was asked to explore the extent to which linkages can be made across ED administrative data systems—and if linkages cannot be made, to identify and understand the barriers.

### **Alignment of Campus Structure**

The panel noted that each PPA corresponds to at least one IPEDS institution—the primary PPA-holding entity (i.e., main campus). Beyond that, accounting for additional locations in IPEDS varies.

For example, a single UnitID could represent a single campus, a main campus of a multicampus institution, a branch campus of a multicampus institution, or a main campus and a branch campus combined.

An IPEDS reporting map describes how the data from the various campuses that are listed on the PPA are accounted for in an institution's IPEDS reporting. A branch campus or additional location that shares a PPA with a main campus may be (1) reported as a separate entity, (2) reported as a branch campus by an affiliated IPEDS reporting entity (usually the main campus, but sometimes another location on the PPA is listed as a separate reporting entity), or (3) reported combined with an affiliated IPEDS reporting entity. In scenarios 2 and 3, no UnitID is assigned to the additional location. The UnitID belongs to the *primary reporting institution*. The panel noted that while reporting IPEDS data at the branch campus level provides more detailed data, it can lead to greater inconsistency if the structure of the campuses is not adequately documented.

Although the IPEDS reporting map should account for the locations that are being reported, panelists noted that several IPEDS data providers found the process for generating and verifying reporting maps confusing. One problem panelists identified was that some data providers were unfamiliar with their institution's PPAs and often did not know about many of the locations on their PPAs. In addition, the panel identified the lack of alignment in reporting periods as a technical issue to consider—institutions are asked to verify reporting maps in IPEDS each August, but updates and changes to the PPA can take place throughout the year.

The panel noted that campus structures in IPEDS are often complex. While the IPEDS reporting maps are a good first step toward aligning UnitIDs and OPEIDs, the panel identified issues for further study, including possible strategies beyond mapping and crosswalks to find a more permanent and salient solution. For example, the TRP discussed the possibility of systematically reconciling differences between campus structures in IPEDS and other systems, and documenting exceptions.

### **Definitions of Key Elements**

The panel found that particular terms and definitions are not necessarily consistent across systems. For example, OPE regulations specifically and narrowly define a *branch campus* as a type of additional location that OPE approves only in special situations. Indeed, most FSA systems do not recognize branch campuses as being distinct from *additional locations*. The IPEDS definition of branch campus, however, has fewer restrictions and allows institutions to report additional locations that are on their PPA. This means that some locations that are considered to be branch campuses in IPEDS would not meet the definition of branch campus in FSA systems.

Additionally, the panel noted that while a classroom location *could* be considered an additional location for FSA purposes, classroom locations that do not offer a full program of study cannot be reported as branch campuses in IPEDS.

The panel expressed concern that an inability to distinguish between key terms such as *branch campus* might hinder discussion regarding alignment across systems.

### **Alignment across Data Dissemination Systems**

ED maintains several consumer information tools to meet requirements in the Higher Education Opportunity Act and to provide information to students, parents, and policymakers about college costs at America's colleges and universities. This information is based upon data collected in IPEDS and other ED data collections, for example,

- College Navigator publishes IPEDS data and also includes FSA data such as the cohort default rate;
- the College Scorecard and Financial Aid Shopping Sheet contains data unique to IPEDS and FSA and also matches data by root OPEID when data are not available for a full 8-digit match; and
- the VA GI Bill Comparison Tool is based on VA Facility Codes but relies on crosswalks to IPEDS UnitID and OPEID.

IPEDS collects data used by consumers as baseline measures for understanding the college choice process. The campus reporting structure impacts how student data are presented to the public. Institutions that report data to IPEDS (i.e., IPEDS reporting entities) will always be represented in search results of consumer information tools. However, there are often additional locations of these institutions where the location itself and/or the data from the location are invisible to the consumer information tools.

For example, a College Navigator search for an institution directs users to information about the institution, with a short summary of general information displayed at the top of the screen and expandable categories of various data components related to the institution. However, some additional locations of an institution do not appear on College Navigator because they are not IPEDS reporting entities. Data for these locations are reported with the primary institutional reporting entity, which is responsible for reporting combined data for itself and all affiliated locations for all survey components. All data appear in the primary reporting institution's record, and the location itself is invisible in College Navigator. Other campuses (also additional locations) that are not IPEDS reporting entities are included in the results of a College Navigator search, but no data are provided for them because none has been reported by them. Instead, a short summary of general information about the campus is displayed and a link directs users to the full details of the primary reporting institution (because data for the campus is reported under the UnitID of the primary reporting institution).

Panelists identified several technical issues for further study related to this topic, including the following:

- the extent to which other ED data collections can be used in conjunction with IPEDS data;
- how to reconcile institution facility codes used by VA and IPEDS UnitIDs;
- the lack of alignment in the time period for ED data collections;
- the appropriateness of combining administrative datasets with items such as loan default rates that change over time because the data system is transactional; and
- whether systems or standards are in place to facilitate an institutional ratings system at this time.

Panelists noted that data from IPEDS and other ED data collections are highly visible and are used in a variety of ways. Therefore, the panel questioned whether it would make sense for the metric to dictate the process for defining an institution. Specifically, the panel questioned whether the common definition of an "IPEDS institution" adequately addresses the complexity of accountability measures, compliance measures, and consumer information—and if separate models are needed, how should they be defined?

## **Changes to Affiliation and Ownership Structure**

For FSA purposes, a school can change affiliation and ownership structure in multiple scenarios. For example, a school location can change from a main to an additional location, an additional location to a main, or from an additional location of one school to an additional location of another. An eligible school can assume the location of an ineligible school, or a new location can be the result of two schools merging. New schools can be created by operating first as an additional location, then becoming a main when they receive their accreditation. Additionally, institutions may choose to report their distance education components as a separate entity. Once such changes are approved by the accreditor and state, FSA updates PEPS to reflect the changes.

As noted in previous discussion, most changes to the IPEDS universe are made in late summer/early fall to align with PEPS, but changes to Title IV eligibility and closures can take place at any time during the year. For IPEDS purposes, institutions that are purchased retain their original UnitID; when institutions merge, a new UnitID is created for the merged entity; and new institutions are assigned a unique UnitID.

After reviewing the process for documenting changes to organizational structure in IPEDS, the panel agreed that more information is needed about how these changes are represented in OPE and other ED systems. Additionally, the panel felt that clear and consistent definitions are needed to accurately document these changes in IPEDS and OPE systems.

## **Exceptions in IPEDS**

Extra reporting entities in IPEDS are created on a case-by-case basis and are designed to allow institutions that have two distinct missions but only one OPEID to report separately. Examples include online campuses and nontraditional campuses.

Currently, PEPS does not usually provide a separate location ID for online campuses that are part of another institution. IPEDS has worked with a number of schools to separate their online component for IPEDS reporting purposes.

Many institutions have a main campus that differs in mission from the other locations on their PPA. Additionally, many institutions have nontraditional programs within their main campuses that have a distinct mission: examples include groups of satellite campuses that serve non-traditional students, such as working adults.

IPEDS has been working to implement state-level reporting for institutions that cross state lines. For many multi-institution systems that cross state lines, implementing state-level reporting is easy. It becomes complicated when institutions are part of the same system, and are located in the same state, but have different OPEIDs. It is also difficult when multiple states are embedded in one 6-digit OPEID.

The panel questioned how these exceptions and extra reporting entities are accounted for in PEPS and whether the OPE structure prevents or impedes alignment between IPEDS and other ED systems.

## **Impact of Changes Identified by the TRP**

Although the panel did not suggest changes to the definition of an institution for IPEDS, they discussed different impacts such changes would have on stakeholders in the postsecondary community.

### **Impact on Institutions**

Given the variation in reporting structures already in place, the panel agreed that changes to the definition of institution would increase the level of reporting burden for institutions, particularly if institutions are asked to report on all additional locations separately. This will result in a substantial increase in the amount of time spent to gather, prepare, and report IPEDS data for multiple locations, as well as additional time spent crosschecking to make sure all data are accounted for across all locations. Additionally, it will be difficult for many institutions to track data at the level of granularity needed to report separately (e.g., enrollment of students who move around within the campus structure).

Further, changing the definition of an institution has implications for the public face of an institution (i.e., how the institution presents itself to the public). Several panelists felt that regardless of the method, changing the definition of institution will produce complexity that institutions would experience internally and will be required to respond to administratively. Panelists acknowledged that institutions often have valid reasons for organizing their campus structures the way that they do. In many cases, the campus structure is related to accreditation rather than the administrative organization.

### **Impact on Sampling**

NCES is able to provide a descriptive portrait of students enrolled in postsecondary education through its large-scale, nationally representative samples of institutions and students, such as the National Postsecondary Student Aid Survey (NPSAS). NPSAS is conducted every 4 years and is the primary source of information used by the federal government (and others, such as researchers and higher education associations) to inform public policy on student financial aid programs such as the Pell grants and Stafford loans. Further, NPSAS is used to obtain baseline data for longitudinal studies of student subpopulations. Specifically, NPSAS data provide the base-year sample for the Beginning Postsecondary Students (BPS) longitudinal study. BPS, conducted every 8 years, follows students over time to examine such issues as persistence and the effects of financial aid on subsequent enrollment.

Interviewing all 26 million students is too expensive and inefficient, so NCES samples students and uses IPEDS as the sampling frame. Using a 2-stage sampling design, NCES first samples institutions, stratified by sector, and then students, clustered by institution. The probability of inclusion in the sample is proportionate to the size of the institution.

A panelist noted that it is unlikely that changes to the sampling units (i.e., institutions) would significantly impede the ability of NCES to generate nationally representative samples or make statistical analysis unreliable. However, a panelist noted that since the probability is proportionate to size, larger institution sets could potentially result in several single institutions controlling a large portion of the sample. While the sampling theory is not affected, it would impact the standard of errors and reliability. Major changes could potentially result in a change to the sample design.

### **Impact on the Data**

The panel expressed concerns not only about preserving trend data, but also that change to the definition could impinge on the way consumer information is displayed. For example, some institutions are unable to separate employee and finance data at the individual campus level but want the visibility of their campus data on College Navigator. Panelists pointed out that small  $n$ 's could result in unintended consequences on measures that show percentage change over time, such as the College Affordability and Transparency Center and College Scorecard.



As a result of this discussion, panelists felt that a solution should meet the needs of (1) researchers and policymakers by somehow tracking or documenting campus structure in a way that allows for alignment with ED data systems and (2) parents and students by providing clear and reliable consumer information in a way that makes sense.

### **Topics for Additional Discussion**

The panel felt there is value in exploring the topics of linkages and alignment across ED systems. However, without adequate documentation of changes to campus structure and ownership, matching up these records and verifying that they are linked correctly is time-consuming. Additionally, because there is no 1-to-1 match between UnitID and OPEID, most of the existing approaches for creating crosswalks between systems are subject to some degree of interpretation. Further, several definitional issues must be reconciled before a solution can be implemented.

As a result of this discussion, the panel agreed that further investigation should be conducted on the ways that UnitID and OPEID align. The panel identified the following discussion topics for TRP 43 to explore in more detail:

- How are campus structures represented in the OPE and IPEDS IDs?
- How are closures, openings, splits, and mergers handled?
- What can help to codify the definition of an IPEDS institution?
  - Physical location and state boundaries?
  - Administration and autonomy?
  - How accreditors define an institution?
- Should there be a size threshold for multiple IDs?
- What are the potential consequences of proposed changes?

### **Next Steps and Reporting Implications**

Once the TRP summary comment period has closed, RTI will review and summarize the comments for NCES. The summary will be used, in conjunction with the summary from TRP 43, to determine whether definitional changes can help better align the reporting entities within IPEDS.

### **Comments**

RTI is committed to improving the quality and usefulness of IPEDS data. We encourage interested parties to send any comments or concerns about this topic to Janice Kelly-Reid, IPEDS Project Director, at [ipedsTRPcomment@rti.org](mailto:ipedsTRPcomment@rti.org) by May 2, 2014.