

**Recommendations
of the
Policy Panel on Racial/Ethnic Data Collection
February 11-12, 1999**

Sponsored by the
National Postsecondary Education Cooperative
National Center for Education Statistics
National Science Foundation

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April 2, 1999

Introduction

Three sponsoring agencies, the National Postsecondary Education Cooperative (NPEC), the National Center for Education Statistics, (NCES), and the National Science Foundation (NSF), convened two policy panels on Racial/Ethnic Data Collection. The first panel was held in March 1998; a second panel was held in February 1999. The purpose of these meetings was to discuss the new standards for Federal data on race and ethnicity issued by the Office of Management and Budget (OMB) in October 1997. These new standards will have a substantial impact on the Integrated Postsecondary Education Data System (IPEDS) Fall Enrollment, Completions, and Fall Staff surveys. There are two major changes in the new standards:

- Students and staff will be able to indicate if they are members of one or more races; and
- Asian or Pacific Islander racial category was split into two separate categories-"Asian" and "Native Hawaiian or Other Pacific Islander."

Background on the First Policy Panel Meeting Held March 17-18, 1998

The purpose of the Policy Panel on Racial/Ethnic Data Collection, held on March 17-18, 1998, was twofold:

- To bring together appropriate organization representatives to decide how and when to implement the transition to the new Federal standards, and
- To ensure that institutional researchers, admissions/registrars, and computer specialists at colleges and universities come to a consensus about the Federal collection of data in IPEDS.

This first policy panel meeting resulted in preliminary recommendations to NCES for the collection and reporting of racial/ethnic data in three areas: options for timing of implementing changes, options for the process of implementing changes, and options for changes in IPEDS survey forms. These preliminary recommendations are included in the summary proceedings for the Policy Panel that appear on the NCES web site at <http://www.nces.ed.gov/NPEC/papers/race-ethnic1.html>.

Background on the Second Policy Panel on Racial/Ethnic Data Collection Held February 11-12, 1999

NPEC, NCES, and NSF again sponsored the second and final Policy Panel on Racial/Ethnic Data Collection, February 11-12, 1999 at the National Science Foundation.

The second panel meeting had three purposes:

- To review the draft OMB Tabulation Guidelines Report (and administrative data collections) and to provide comment to OMB;
- To make final recommendations regarding the changes to the IPEDS survey forms, and the timing and process for implementing these changes; and

- To develop a plan to disseminate information to all stakeholders on the implementation of the new OMB racial/ethnic standards.

These 1999 recommendations focus on the second purpose above and reflect advice provided by OMB in the draft Tabulation Guidelines Report.

Policy Panel on Racial/Ethnic Data Collection

February 11-12, 1999

Panel Recommendations

The panel was asked to consider several questions that: (1) addressed the status of the new racial/ethnic reporting; (2) asked for suggestions or comments; or (3) elicited specific recommendations. The following summary presents the panel's responses to the questions. Where recommendations were forthcoming, they are identified in the context of the answer to a specific question.

Comments from four policy panelists, David Davis-Van Atta, Charles Benil, Mark Chisholm, and Mary Sapp, and from the American Association of Collegiate Registrars and Admissions Officers (AACRAO) that were not part of the panel responses or the formal, approved panel recommendations are provided in italics.

Discussion Question 1

Where are institutions in the implementation of changes in racial/ethnic data collection from students?

Response 1:

Institutions of higher education are generally aware of the classification changes, but they are all waiting on official, definitive guidance from OMB and NCES before they begin implementing the changes. However, not all information technology staff are aware of these changes, especially since many institutions are focusing their technology resources on Y2K efforts. The racial/ethnic classification changes will impact many units within postsecondary institutions. Due to the nature of the organizational relationships among these units, the panel expressed concern about whether personnel across all units involved and affected are communicating and coordinating their efforts to implement changes. In addition, the panel expressed concern that the need for human resources and EEO/AA offices to provide data related to compliance issues, rather than the needs of institutional research offices, might drive the implementation.

Comment from AACRAO: Most institutions are waiting for technical guidelines from the Department of Education before implementing the changes. Institutions have indicated a need for official guidelines from the Department of Education that: 1) are definitive, 2) provide clarification, 3) include examples, clarifying tables, flow charts, and/or diagrams to increase understanding and help ensure compliance, and 4) will expedite the conversion process.

Discussion Question 2

How long will it take institutions to have consistent racial/ethnic data on all students, faculty, and staff? How long will it take vendors to make changes to their systems and install them at customer sites?

Response 2:

The panel concluded that it would probably take institutions 4 years to have complete, consistent data, beginning from the time of their commitment to make the changes. It will take a total of 2 years for both software vendors and institutions with their own custom-designed computer systems to make the changes due to the need to reprogram their systems. Institutions will need another 2 years to attain consistency in collecting and maintaining racial/ethnic data across their institutions—assuming they would resurvey all members to ascertain their race/ethnicity. (See Recommendation 9 on resurveying students, faculty, and staff.)

AACRAO comment: The timeframe is probably realistic although some of the larger (more established) software vendors may be able to make changes more expeditiously.

Discussion Question 3

What specific guidelines and instructions can institutions follow to collect racial/ethnic data from students, faculty, and staff?

Response 3:

The panel recommended three specific guidelines and instructions institutions can follow to collect racial/ethnic data:

Recommendation 1:

- Institutions should use the one-question format for *asking* the question about race/ethnicity of their members, unless individual states require the two-question format. The panel recommended the one-question format for several reasons. First, the College Board, after recent analyses of 349,608 students taking the SAT, indicated that the one-question format provides better reporting by college-age students. Second, all interested groups would more easily understand the one-question format. Third, the one-question format would be easier to process and to implement in forms. Finally, the one-question format can more easily handle additional institutional codes.

AACRAO comment: The one-question format would be easier to process and implement in forms. However, a few institutions feel they could better accommodate diverse student populations by the use of the two-question format (e.g., students of Hispanic/Latino ancestry might more appropriately report their ethnicity by use of the two-question format).

Recommendation 2:

- Institutions should use at least eight fields to store detailed race/ethnicity data for individuals to allow the most flexibility in later uses of the data. The eight fields would not necessarily be binary; institutions may use codes instead (e.g., American Indian tribal affiliation could be stored in the American Indian/Alaska Native field). The eight fields include:
 - (1) American Indian/Alaska Native
 - (2) Native Hawaiian & Other Pacific Islander
 - (3) Asian American
 - (4) Black/African American
 - (5) White
 - (6) Hispanic/Latino
 - (7) Bridge field (i.e., a field storing race/ethnicity using the old coding scheme—one choice from five categories—or a “bridged” field created from the responses to items 1 through 6 above). Existing programs could continue reading the fields until all programs are rewritten to read the six new fields.
 - (8) Flag field (i.e., a field indicating whether the “bridge” data are from a data collection using the old categories or whether they are “bridged” from the new categories)

AACRAO comment: We are uncertain about the utility of using both a bridge and a flag field. Couldn't this be simplified?

Comment from Mary Sapp, policy panelist: Institutions might want to use nine codes instead of eight. The ninth field is the field into which old data are copied. Students in 2002 Graduation Rate Survey (GRS) cohorts will need old data for GRS purposes (from field 9) and new fields (1-6).

Recommendation 3:

- The Department of Education should provide institutions with two types of manuals and guidance. The first manual, which should be ready for dissemination by March 15, 2000, should describe and explain the OMB standards and institutions' compliance requirements. The second manual should be a practical handbook that instructs institutions on how to collect, store, bridge, and report data using the new racial/ethnic classification standards. Both manuals should be available in hard copy and online.

AACRAO comment: These manuals should incorporate institutional examples, tables, and diagrams to promote ease of understanding and compliance. It would also be useful to include illustrative examples or models in the instructions sent with the IPEDS packets. It would be helpful to also identify resources for technical assistance.

Discussion Question 4

Is a pilot test or feasibility study necessary before we fully implement the new reporting categories?

Response 4:

It is probably too late to conduct a full pilot test and still meet the 2002/2003 reporting deadlines. Instead, it would be appropriate to do some cognitive testing, more analysis of College Board and American College Testing data, as well as impact studies and research in order to examine the revisions as they are implemented and determine how to bridge between the two sets of codes. Also, it would be appropriate to test the instructions to make sure that they are well understood. Another area requiring special impact studies is how the changes would affect reporting and counts of specific subpopulations such as American Indians and Alaska Natives. Reporting for this group in particular may present disruptions in the trend line due to the definitional change (i.e., addition of Central and South American Indians to this classification). Similar work should be done for the former Asian or Pacific Islander category, which now is two categories: Asian, and Native Hawaiian or Other Pacific Islander.

Discussion Question 5

If we decide to conduct a pilot test of racial/ethnic categories, should the planned NCES web-based data collection system for IPEDS protocol be included as the only method for responding or as one of several methods?

Response 5:

It is probably too late to conduct a pilot test. Any testing that is done should permit paper forms in addition to electronic forms of data collection.

Discussion Question 6

What are the optimal implementation schedule and alternative schedules that would fully implement the new racial/ethnic standards in 2001 or 2002?

Response 6:

Full implementation of the new standards should be possible for the 2002/2003 school year. The panel concluded that most institutions would not be ready to report to NCES prior to fall 2002, using the new standards. The panel believes that it will take 2 years for institutions to be able to implement the new classification system and 2 more years to be able to have consistent data. In order to meet this ambitious schedule, the panel recommends the following deadlines:

Recommendation 4:

March 15, 1999	NCES should produce written recommendations from the policy panel meeting for comment at postsecondary education conferences scheduled in the spring 1999.
October 15, 1999	NCES should produce a draft of the IPEDS data collection forms.
March 15, 2000	NCES should finalize IPEDS data forms so institutions can meet the fall 2002 reporting deadline. Also, NCES should publish and disseminate the first manual referred to in Recommendation 3.
Fall 2000	Institutions may begin reporting to NCES using the new standards, if they are ready.
Fall 2002/2003 academic year	Full implementation of the new standards should be possible for the 2002/2003 school year.

Comment from Mary Sapp: Schedule should include the following as well:

<i>Fall 2002</i>	<i>Fall Enrollment; start collecting new data for future GRS cohorts</i>
<i>Fall 2003</i>	<i>Staff, Completions Surveys</i>
<i>Future</i>	<i>Need to phase in GRS surveys</i>

Discussion Question 7

Should we phase in the implementation according to surveys, institutional types, or racial/ethnic categories?

Response 7 and Recommendation 5:

- The panel recommended that implementation of the changes should occur simultaneously in all institutions. However, there may be a need to make transitional changes to some computer programs in order for them to be used while the changes are being implemented in the collection systems. These transitional changes would serve to bridge data either by recoding the new data to the old categories and/or by providing flags identifying what sort of data were contained in the field (i.e., old or new).

Recommendation 6:

- The changes to the Graduation Rate Survey (GRS) must be phased in. Institutions cannot go back and reestablish the race/ethnicity of a GRS cohort since some of those students would no longer be at the institution; therefore, it would not be possible to resurvey them on their race/ethnicity using the new standards.

Discussion Question 8

Is it necessary to provide training in racial/ethnic reporting to institutional data collectors/respondents?

Response 8:

The panel strongly supports the idea of NCES conducting training in as many postsecondary education forums as possible, for example, AIR, AACRAO, EDUCAUSE, NPEC, CUPA, SHEEO, AA/EEO associations, student affairs groups, and human resources organizations. The panel noted that training for relevant personnel at the following types of institutions is critical: historically black colleges and universities, Hispanic colleges and universities, tribal colleges, rural colleges, and small proprietary colleges and universities.

AACRAO comment: Yes, training is essential. Other types of information dissemination activities should supplement the training events. Dissemination of information via web sites and listservs of higher education associations, SHEEO, and the Federal government should be utilized. The information disseminated should be: 1) definitive, 2) concise, 3) consistent, 4) instructional, and incorporate tables, flow charts, diagrams, and especially models and examples.

Comment from David Davis-Van Atta, policy panelist: The training probably needs to take place within training efforts for IPEDS redesign generally.

Discussion Question 9

Who should be informed at the institution about changes in reporting? How do we identify and contact the appropriate persons?

Response 9:

Until there are final decisions about IPEDS changes, detailed information about the anticipated changes should be shared with those responsible for resource allocation (i.e., decisions that must be made years in advance).

Recommendation 7:

- The panel recommended that NCES inform CEOs, institutional presidents, and appropriate program directors (e.g., directors of institutional research, registrars, human resources directors) of the changes in a number of ways. First, NCES should send letters to institutional presidents, directors, and CEOs to ensure that the changes are included in their plans for training, software development, etc., and should link the changes to financial aid (i.e., compliance with Title IV). Second, CEOs should also be notified of the changes through professional bulletins, newsletters, publications, etc. In addition, the panel recommends that NCES provide “executive summaries” to inform institutions of the parts of the OMB guidance that are relevant to their activities.

Comment from Charles Benil, policy panelist: It should be explicitly stated that the race/ethnicity changes in IPEDS are part of the compliance with Title IV. Both Title IV and IPEDS sanctions could be applied for non-compliance.

Discussion Question 10

How should the data be reported to NCES given the draft OMB Tabulation Guidelines Report? What categories should be used?

Response 10 and Recommendation 8:

The panel recommended a new reporting format that includes a total of 17 columns in two tables. The first table consists of six categories of individuals reporting each race/ethnicity alone, Hispanic/Latino plus one or more races, and Non-Hispanic plus more than one race. This first table provides a “minimum/lower bound” count for each group. The categories for the first table are:

- All Non-Resident Aliens
- United States Citizens and Permanent Residents Heading
 - (2) Unknown Race/Ethnicity

- (3) American Indian and Alaska Native only
- (4) Asian American only
- (5) Black/African American only
- (6) Native Hawaiian & Other Pacific Islander only
- (7) White only
- (8) Hispanic/Latino only
- (9) Hispanic/Latino plus one or more races
- (10) Non-Hispanic plus more than one race
- (11) TOTAL (Computed field; sum of the above 10 columns)
- (11a) Total number reporting more than one race regardless of ethnicity. (NCES should only add this category if required by OMB.)

The second table includes six categories for individuals reporting each race/ethnicity alone and in combination with other categories. The second table provides a “maximum/upper bound” count. The categories for the second table are:

- Any selection of race/ethnicity alone or in combination (U.S. citizens and permanent residents only)
 - (12) American Indian and Alaska Native
 - (13) Asian American
 - (14) Black/African American
 - (15) Native Hawaiian & Other Pacific Islander
 - (16) White
 - (17) Hispanic/Latino (*Computed field; sum of 8 and 9 above*)

Discussion Question 11

Would the development of web-based protocols for collecting IPEDS data affect the recommendations? Would confidentiality concerns affect the recommendations?

Response 11:

No, the development of web-based protocols for collecting IPEDS data should not affect the recommendations, though it will be helpful for the website to accept importing or uploading institutional data files. No, confidentiality concerns do not affect the recommended reporting format (see Recommendation 8) because institutions will be asked to report highly aggregated data.

Mark Chisholm and Mary Sapp's comments: Many institutions are concerned about confidentiality issues as it affects Completions and Staff surveys.

Discussion Question 12

Would it be possible to determine the most frequently reported combinations and limit the categories to those? Should we wait for the results of the decennial census before recommending specific tabulation requirements?

Response 12:

No, this is not relevant given the recommended reporting form in Recommendation 8. No, there is not enough time to wait for the results of the decennial census.

Discussion Question 13

Do the categories need to be consistent among all the IPEDS surveys that collect racial/ethnic data?

Response 13:

Yes, the categories should be consistent with the exception of the Graduation Rate Survey, which will not be consistent for at least 6 years. (See Recommendation 6.)

AACRAO's comment: Consistency across surveys reduces the data collection and reporting burden that institutions face and improves data integrity.

Discussion Question 14

Should IPEDS reconsider the data that are collected by race/ethnicity?

Response 14:

No, IPEDS should not reconsider the data that are collected by race/ethnicity.

Discussion Question 15

How should non-resident aliens be reported?

Response 15:

See Recommendation 8.

Discussion Question 16

Should NCES try to develop a bridge between the old and the new reporting? If so, what are the parameters of greatest concern to try to bridge? What data would need to be collected?

Response 16:

Yes, the bridge from the new to the old reporting should be of short duration, probably no more than 2-3 years until a trend line has been established with the new method. NCES should devote a reasonable degree of time and effort to the bridge-building exercise, but devote most of its effort to establishing a valid and reliable new trend line. NCES should collect whatever data it deems necessary to build the bridge, but the bridge back to the old data will be for institutional purposes. Appendix D in the OMB draft report offers some guidance on bridge-building as do data collected by the College Board and the American College Testing state and regional data. The exact specifications for building a bridge are beyond the scope of this working group. NPEC might want to establish a working group to develop a bridge.

Comment from Mark Chisholm: Institutions might need to publish new data bridged back into the old categories for their own internal purposes. Therefore, a national bridge that can be used for this purpose is helpful. Also, NCES might want to publish trend data in which case the bridge would be needed.

Comment from Charles Benil: No one is sure about how long the bridge will be needed. The timeline should govern the work that can be done on the bridge.

Discussion Question 17

What should we do about “mixed” data (i.e., data from an institution that has classified students and staff by the old categories and also by the new categories)?

Response 17:

The panel made four recommendations about “mixed” data:

Recommendation 9:

- Institutions should be *strongly* encouraged but not required to resurvey continuing students for IPEDS compliance. They should resurvey continuing staff to comply with EEO reporting requirements. Instructions for resurveying students and staff may ask them to change their existing ethnic/racial classification only if the classification is inaccurate (i.e., failure to change affirms the accuracy of the existing classification).

Recommendation 10:

- Institutions will have mixed data before they resurvey continuing students and staff. However, institutions should report all data to NCES using one format for any given year, not two separate formats. NCES should only report data in a single format. Institutions will need a bridge for reporting in one format, therefore, NCES should develop one.

Recommendation 11:

- Institutions that have data collected under the *old* racial/ethnic standards should convert them to the *new* standards before reporting it to NCES, if NCES requests data in that format. This might require developing a bridge between the old and the new standards, although such a bridge would be more straightforward. In addition, institutions should note on the survey the percentage of continuing students and staff who were resurveyed using the new standards and the percentage of students, and faculty/staff for whom data are still available based only on the old standards.

Recommendation 12:

- Institutions should report new data as new data. *New* data cannot easily be converted to the *old* format due to the multiple responses (i.e., reporting more than one race). Institutions should *not* develop their own methodology to impute data to the reporting format in use. NCES should develop a bridge at the national level so institutions can report *new* data in the *old* format.

Discussion Question 18

At what level do institutions want to report to NCES, and what level of detail would they like to see from other institutions?

Response 18:

See reporting form in Recommendation 8. Institutions are free to collect, for their own purposes, racial/ethnic data at greater levels of detail than required by the recommended reporting form.

Discussion Question 19

How should the data be reported in publications? Should the data collection categories and the reporting categories be the same?

Response 19:

Reference the recommended reporting form in Recommendation 8 when reporting data in publications. Yes, the data collection and the reporting categories should be the same.

AACRAO's comment: The collection and reporting categories should be consistent. This reduces the data manipulation burden.