
Appendix A—Technical Review Panels

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AGENDA

IPEDS STUDENT UNIT RECORD FEASIBILITY STUDY TRP #1 (STATES, SYSTEMS, & PRIVATE ASSOCIATIONS) October 28-29, 2004

Hyatt Arlington
Arlington, VA 22209-9990

Thursday, October 28

- | | |
|-------------------------|--|
| 8:00 a.m. - 8:30 a.m. | Continental Breakfast |
| 8:30 a.m. - 8:45 a.m. | Meeting Begins |
| 8:45 a.m. – 9:00 a.m. | Introduction to the Feasibility Study—Dennis Carroll, NCES |
| 9:00 a.m. – 9:30 a.m. | Co-Chair Introductions—Hope Williams, North Carolina
Independent Colleges and Universities;
Tad Perry, South Dakota Board of Regents |
| 9:30 a.m. – 10:30 a.m. | Existing State Unit Record Systems—Tad Perry, South
Dakota Board of Regents; J. Michael Mullen, West Virginia
Higher Education Policy Commission; John Porter, SUNY
System Administration |
| 10:30 a.m. – 10:45 a.m. | Break |
| 10:45 a.m. – 12:00 p.m. | Re-disclosures—Hope Williams |
| 12:00 p.m. – 1:30 p.m. | Working lunch |
| 1:30 p.m. – 2:30 p.m. | Burden—Gary Cox, Association of Independent Kentucky
Colleges & Universities |
| 2:30 p.m. – 3:30 p.m. | First year Implementation—Dennis Carroll
Field test—Cathy Statham, NCES |
| 3:30 p.m. – 3:45 p.m. | Break |
| 3:45 p.m. – 4:45 p.m. | Wrap-up discussion |

Friday, October 29

- | | |
|------------------------|--|
| 8:00 a.m. – 8:30 a.m. | Continental Breakfast |
| 8:30 a.m. – 8:45 a.m. | Meeting Begins |
| 8:45 a.m. – 10:00 a.m. | Review of previous discussion—John Milam, HigherEd.org |

10:00 a.m. – 10:30 a.m.	On-going discussion
10:30 a.m. – 10:45 a.m.	Break
10:45 a.m. – 12:00 p.m.	Continued follow-up discussion
12:00 p.m. – 1:30 p.m.	Working lunch and Summary statements—Hope Williams & Tad Perry
2:00 p.m.	Adjourn

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AGENDA

IPEDS STUDENT UNIT RECORD FEASIBILITY STUDY TRP #2 (INSTITUTIONAL PERSPECTIVES) November 3-4, 2004

Hyatt Arlington
Arlington, VA 22209-9990

Wednesday, November 3

8:00 a.m. – 8:30 a.m.	Continental Breakfast
8:30 a.m. – 8:45 a.m.	Meeting Begins
8:45 a.m. – 9:00 a.m.	Introduction to the Feasibility Study: Context for Proposal and What will be Learned—Dennis Carroll, NCES
9:00 a.m. – 9:15 a.m.	Co-Chair Introductions—Mike McGuire, Georgetown University & Jeffrey von Munkwitz, University of Connecticut
9:15 a.m. – 9:30 a.m.	Summary of TRP1 Discussion
9:30 a.m. – 10:30 a.m.	Privacy/Re-disclosures
10:30 a.m. – 10:45 a.m.	Break
10:45 a.m. – 12:00 p.m.	Burden
12:00 p.m. – 1:30 p.m.	Working lunch
1:30 p.m. – 2:30 p.m.	Campus Coordination/System Issues
2:30 p.m. – 3:30 p.m.	Data Flow/Possible Record Formats Transaction vs. Analytical Extracts
3:30 p.m. – 3:45 p.m.	Break
3:45 p.m. – 4:45 p.m.	Timing/Census Dates

Thursday, November 4

8:00 a.m. – 8:30 a.m.	Continental Breakfast
8:30 a.m. – 8:45 a.m.	Meeting begins
8:45 a.m. – 9:15 a.m.	Review of first day’s discussion—John Milam, HigherEd.org
9:15 a.m. – 10:15 a.m.	First year Implementation—Dennis Carroll Field test— Cathy Statham, NCES
10:30 a.m. – 10:45 a.m.	Break
10:45 a.m. – 12:00 p.m.	Continued follow-up discussion
12:00 pm – 1:30 pm	Working lunch and Summary statements—Mike McGuire, Georgetown University & Jeffrey von Munkwitz, University of Connecticut
2:00 p.m.	Adjourn

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AGENDA

IPEDS STUDENT UNIT RECORD FEASIBILITY STUDY TRP #3 (STAKEHOLDERS) November 9-10, 2004

Hilton Garden Inn
Washington, DC 20005

Tuesday, November 9

- | | |
|-------------------------|--|
| 8:00 a.m. – 8:30 a.m. | Continental breakfast |
| 8:30 a.m. – 9:00 a.m. | Meeting begins, Co-Chair introductions—Stan Ikenberry, University of Illinois & Chris Nelson, St. John’s College |
| 9:00 a.m. – 9:30 a.m. | Background, Process and framework of the feasibility study—David Bergeron, ED Office of Postsecondary Education & Dennis Carroll, ED National Center for Education Statistics |
| 9:30 a.m. – 10:15 a.m. | Discussion of public policy considerations |
| 10:15 a.m. – 10:30 a.m. | Break |
| 10:30 a.m. – 11:30 a.m. | Privacy, confidentiality, and security—Sarah Flanagan, National Association of Independent Colleges and Universities & Francis Moran, ED Family Policy Compliance Office |
| 11:30 a.m. - 12:00 p.m. | State issues—Paul Lingenfelter, State Higher Education Executive Officers & Tod Massa, State Council of Higher Education for Virginia |
| 12:00 p.m. – 1:30 p.m. | Working lunch |
| 1:30 p.m. – 2:30 p.m. | Campus issues: Coordination across offices—Melanie Corrigan, American Council on Education; Pat Smith, American Association of State Colleges and Universities; Frank Balz, National Association of Independent Colleges and Universities |
| 2:30 p.m. – 3:30 p.m. | Campus issues: Burden and cost—Ken Redd, National Association of Student Financial Aid Administrators; Barmak Nassirian, American Assoc. of Collegiate Registrars & Admissions Officers; Terry Russell, Association for Institutional Research |
| 3:30 p.m. – 3:45 p.m. | Break |
| 3:45 p.m. – 4:45 p.m. | What next? “If authorized, if funds are appropriated.” |

Wednesday, November 10

8:00 a.m. – 8:30 a.m.	Continental breakfast
8:30 a.m. – 8:45 a.m.	Meeting begins
8:45 a.m. – 9:15 a.m.	Review of first day’s discussion—John Milam, HigherEd.org
9:15 a.m. – 10:15 a.m.	On-going discussion
10:30 a.m. – 10:45 a.m.	Break
10:45 a.m. – 12:00 p.m.	Continued follow-up discussion
12:00 p.m. – 1:30 p.m.	Working lunch and Summary statements
2:00 p.m.	Adjourn

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Appendix B—Estimates of Burden

As part of the IPEDS Student Unit Record Feasibility Study, a wide variety of information has been collected about the potential costs to institutions of implementing the proposed unit record system, including participant comments and discussion as part of three Technical Review Panel (TRP) meetings¹. Cost data were not included in the design for the study; however, this appendix describes cost estimates that were received from institutions and broadly discusses the various types of estimates that were made. In addition, specific comments regarding institutional burden are presented. In addition, numerous informal comments and feedback from the postsecondary education community were received. As the discussion of cost and burden evolved during the process of the feasibility study, one of the TRP panelists suggested that any input regarding cost estimates could help in the preparation of the report. Subsequently, an AIR Alert email was sent to over 5,000 subscribers by the Association for Institutional Research (2004; 2004b), and references to the feasibility study were made at presentations before the American Association of Community Colleges (AACC), the National Association of Independent Colleges and Universities (NAICU), the Southern Association for Institution Research (SAIR), and the Northeast Association for Institution Research (NEAIR) national and regional conference sessions.

Several hundred persons participated in the TRP meetings; their comments are integrated into this discussion of cost estimates. Numerous additional comments were received by e-mail. Table B1 summarizes these comments and those from the TRP discussions that are attributable to an individual. Some of these comments represented groups of institutions, specifically the Higher Education Data Sharing consortium of private schools and the Association of America Universities Data Exchange. Other respondents included a range of schools, including SHEEOs (Maryland and Virginia); large state systems (Indiana University and the University of Texas); research universities (Washington University, Johns Hopkins, and University of New Mexico); state universities (George Mason University and the University of Colorado at Boulder); small private institutions (St. Olaf's, Shimmer, Mount Mary College, and Randolph Macon Woman's College); and community colleges (Pima Community College and Walters State Community College).

¹ This section discusses the costs to institutions if a UR system were implemented. The costs to NCES would vary depending on the design of such a system; as noted earlier, NCES already uses much of the technology required in the current IPEDS collection.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic

	Comment
Classification	
James Madison University	<p>.... Also IPEDS UR should give serious consideration to maintaining two fields for student status: one as submitted by the institution, the other as determined by IPEDS for analysis above institutional levels. Accuracy of first-time freshman (FTF) data is given a high priority in this proposal and I expect that IPEDS will mandate changes to FTF status based on historical data in the IPEDS UR system. An institutional status field, controlled by the institution, could be used for IPEDS and institutional GRS calculations. This would drastically reduce the burden on institutions and IPEDS, prevent resubmission of data back to state systems (close the fed-state edit loop), and allow earlier release of consistent FTF statistics.</p>
New York Institute of Technology	<p>I think consideration needs to be given to how much effort it will take to properly classify students. For many years, especially in institutional research (IR), I think institutions have grown accustomed to downloading what is in institutional databases and then “working with that data” to fit into the IPEDS reports. This person effort may prove to be very difficult to accurately code. In fact, in some cases the metadata needed to create the IPEDS reports exists outside the student database of record. This could involve dozens of full-time equivalent (FTE) days of effort by both programming staff and the staff of IR in conjunction with the functional offices. Some of the fields in the proposed upload list would have to be created in this reverse-engineering method so that the fields live natively on the database of record from which the uploads ought to occur.</p>
Coordination	
Alabama Department of Postsecondary Education Bates College	<p>Institutions will have to implement more elaborate reconciliation processes between the business office, Title IV records, and IPEDS, etc.</p> <p>Elements of the data to be requested tend to be scattered among several offices, including the registrar, financial aid, admissions, finance, information services, and/or the Dean of Students. These offices may report to different members of a college’s senior staff, and they may have different priorities, calendars for updating information, and deadlines that conflict with those set by IPEDS. The cultural/administrative obstacles to coordinating new forms of sharing across independent offices are not insignificant, and will require extensive meetings, as well as buy-in from senior staff, to raise the data sharing issue to an institutional priority. The coordination task becomes even more difficult as multiple surveys become integrated and have to pass multiple edits and cross-checks. Space does not permit us to convey the amount of time and high-level negotiations that regularly take place at our institution when “data providers,” “data analysts,” and “data consumers” have slightly different interpretations about data definitions, or differing levels of understanding of the complex IPEDS instructions. The level of access to data varies greatly in small institutions. Some institutional research offices or IPEDS coordinators simply compile data prepared by other offices; others have can only run certain “canned” reports or time-specific data extracts; some have to request others to run extracts for them, and a limited number have full access to data and the technical ability to obtain it across administrative systems. Few small institutions have “data warehouses” that are adequate to handle the types of questions being raised in the IPEDS unit record context. Others have written to you about the complexity of integrating census data with transactional data, so we will not elaborate... Like it or not, at many institutions, key offices at many institutions still have a “stovepipe” mentality, and there will also be “territorial” battles to be fought when offices are challenged with new reporting processes. Because of the many ways in which the IPEDS data are used, even seemingly minor changes in definitions and reporting practices (from IPEDS’ perspective) can require direct decisions and intervention at the most senior administrative levels. At some institutions, some reporting questions may even require faculty legislation to change definitions or procedures. There are internal concerns about security and privacy, since many more staff will probably need to have access to certain data elements and will need additional training in how to protect privacy.</p>
Marian College	<p>Some of the information being requested is not readily available the way it is requested. For a variety of reasons, the college financial aid, admissions, HR, and receivables are either not integrated or only partially integrated with the campus academic information systems, and not at all or minimally with each other. Connecting information from these disparate resources, while not impossible, requires hand manipulation and resolution of mismatched keys, etc. The IR office, which has done all the reporting, does not access some of these records, such as the student billing accounts (1098-T). With the merging of files that don’t normally talk to each other, each step of this submission will have to be supervised manually, with error resolution of keys or other concerns. While this scenario should improve over time as corrected data becomes the norm, the need for close intervention and error checking in the process will almost certainly continue indefinitely.</p>

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
National Association of Student Financial Aid Administrators	Currently, aid offices at some multi-campus and branch campuses report Pell Grant and campus-based aid data through their larger system offices. These offices may have to reprogram their systems in order to get data for individual students at the branch campus level. This may cause some additional costs or other burdens.
Towson University	In order to complete the mandatory data cleansing and verification of multiple submissions of student unit-record files, additional personnel will be necessary in several service offices; institutional research, financial aid, enrollment services, and admissions.
University of California	Different offices working on different issues and reporting through different mechanisms, whether it is the bursar versus the financial aid office, or campus-driven data versus system wide data, different requirements for data collection and reporting at the state and federal levels, competing deadlines, timelines, multiple dates for submission of data, and overall coordination of dates in general were all topics discussed at length.
University of Maryland, Baltimore County	The transactional nature of the proposed system will require a data reconciliation process that would involve staff in multiple offices and on a continuous basis. Minor errors or inconsistencies could lead to substantial negative affects on the lives of individual students.
University of Wisconsin – Madison	Several different offices at a large institution will be involved in UR IPEDS file development. At UW-Madison, those offices include the registrar's office, the bursar, institutional research, business services, athletics, and student financial services, information technology, and others.
University System of Maryland	Many institutions in the USM run systems which are functional in one area (financial aid, enrollment management, human resources, etc.) but are not cross-compatible. The proposed data collection system would require greater compatibility which would require the purchase of software and/or substantial programming . . . The use of the unit record data for federal financial aid verification demands a higher level of accuracy for each individual record than is currently necessary for analytical purposes. Put simply, today a minor error in analytic data might create a data anomaly, but in the proposed system it could have a substantial negative impact on the lives of individual students. This will require assigning personnel from enrollment management to monitor these data.
Field test	
Association of American Universities Data Exchange	Institutions are concerned about the timetable and their ability to generate the unit-record information by 2006-07, if they are selected to be in the pilot program. With regard to the pilot program, one responded indicated: "State systems have not been studied sufficiently, goals are not clear, and clearly 100 voluntary pilot institutions would provide considerable information. Why not do these things first, then go to the mandatory pilot."
Columbia College Chicago	Some of our deepest concerns surround the proposed timing of this change. The current proposal states that the pilot year for this switch will occur during the 2006-2007 academic year. The College strongly feels that this does not give our institution enough preparation time. If the legislation is passed this year, the pilot year should occur no sooner than the 2007-2008 academic year.
Johns Hopkins University	Student records are presently scheduled for implementation in summer 2006, right before the planned pilot study for IPEDS unit records in fall 2006. If selected for mandatory participation in the pilot, Hopkins would be asked to submit IPEDS in both the current and the new formats. Hopkins would be a poor choice for the pilot because it would be attempting both formats for the first time on the new system. We would be spending money to develop a new way to replicate the old format, never again to be repeated, and the timing of the pilot could bring the entire implementation to a halt.
Financial aid file	
Columbia College Chicago	There are also concerns that it will be difficult to reconcile the current financial aid audit information to what will be required in the files. It is critical that the deadline of the financial aid file must come no sooner than the six months after the end of the academic year, after all other federal audits are completed.
Financial aid administrator: large, four-year, private, not-for-profit, university in the Mid-Atlantic region	I notice that "Institutional Grants" are lumped together in one category, without differentiating between grants that are funded and those that are unfunded. This might be described as the NACUBO approach . . . but it is worrisome in that those who like to impugn institutional aid as "tuition discounting" tend to give the impression that all institutional aid is unfunded, and those who wish to use institutional aid for enrollment management purposes like to assert that there is no difference and behave as all institutional aid is funded, if only, in some cases, by "tuition money."
Financial aid administrator: large, public, four-year university in the Midwest	It is not a large task to get the information requested.
Financial aid administrator: large, public, four-year university in the Southeast	We have this information in our database, so I do not know that it would be very cumbersome to report.
Financial aid administrator: small, liberal arts college in the Northeast	While I'm not sure of the impact, once we design the programs and steps in the first year (and provided they don't change the requirements every year) it shouldn't be too bad to produce this data and send it off.

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Marian College	Financial aid data, which seems to be of paramount interest, changes continually and dramatically throughout the year. At any point you fix it, it is a partial picture, not settling out until the following year. It is probably not useful for the purposes intended unless received early, and isn't stable enough to generate firm conclusions at that time. We do not consider our financial aid data final until the next year.
Maryland Higher Education Commission	The use of multi-submission of IPEDS UR for all types of data is problematic in some areas. The collection of student financial aid data over multiple points within a year does not provide an accurate picture of the financial aid picture at the end of a yearly period. There are too many adjustments (awards adjustments, audit verification corrections) made to student financial aid over a year's period to make any type of collection besides end of year accurate.
National Association of Student Financial Aid Administrators	Collecting information for graduate/professional student assistantships may be difficult at many campuses. These data are usually not kept in the financial aid office. They are kept by deans, who are not always willing or able to share these data with the aid office. This is particularly true at campuses that have decentralized aid offices.
University of California at Berkeley University of Miami	The treatment of summer sessions will be another issue, especially with respect to financial aid. The net price for students for students enrolled in fall/spring is much lower than for those enrolled in summer. For example, students who use Pell for fall and spring won't have it in the summer because of the annual eligibility limits. No UM gift aid is awarded during the summer. NCES needs to decide whether they want net price for a "typical" student (enrolled just fall and spring) or for all students. This question also seems to fail to take into account differential pricing offered by some programs, so any attempt to look at the whole will not represent the norm. . . . Overall budgets are not very accurate. Students living off campus don't pay us for room and board so that component of total budget is difficult to estimate for them, and no student pays the University for books and supplies, personal expenses or transportation. In addition, if the student changes intensity, the costs change but may not be reflected accurately in the database. So you'll never really know the net cost for students if the total "budget" is used. You'd have to focus on the tuition and fees only, but then you'd only have net tuition and fees, not net cost. Even that won't be completely accurate because we award aid on the budget, not on just tuition and fees. Furthermore, some students will have a negative net tuition and fees because they receive aid for expenses above and beyond just tuition and fees. How would these students be handled?
University of Miami	It sounded as if SFA would continue to be based on the prior-year cohort (either fall or full-year). If that's the case SFA data collected during the year associated with the first EF (e.g., Fall 2007) would be for the students for the prior year rather than the students included in that UR anyhow (e.g., it would be for students enrolled in Fall 2006 not Fall 2007). Delaying UR collection of SFA data a year after EF would align the SFA cohort with the EF cohort (e.g., NCES would request data for students enrolled in Fall 2007 in 2008-2009).
General issues	
Agnes Scott College	I also have concerns regarding the human power and financial resources necessary to address even the most conservative data requirements. Small institutions, such as Agnes Scott College, simply do not have the human nor technological resources to comply.
Alverno College	Completing IPEDS is time consuming but the present practices dovetail with institutional reports, information to Common Data Set, Petersons, US News & World Report, etc. I am concerned about anything that would mean additional work, additional checks and balances on the institution's part . . . It seems to me it is the responsibility at the local level to submit the IPEDS information for the institution. This feels like someone else taking our numbers, manipulating them and drawing conclusions. Also, just letting the computer "do the numbers," does not provide a check and balance. Sometimes when I am completing IPEDS I notice a race code or age or state, etc., missing, I can then have that investigated and manually fix the report.
American Association of Community Colleges	Community colleges represent about half of all undergraduates and they "don't know what happens to their students once they leave their schools." They don't know what happens to a lot of students in higher education. "AACC is cautiously optimistic and looking forward to the results of the study. However, we are concerned about issues related to privacy and the potential burden on our institutions, and how these will be addressed as a result of the feasibility study."

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
American Council on Education	There are “lots of operational issues.” Many of these were raised in the previous two TRPs. These are “not insurmountable, but can be magnified or minimized in terms of burden” because they can be “very complex in actions.” “We’re prepared to love this a lot unless we hate it. It could do us a lot of good, unless it hurts us.” We acknowledge that “most of us are desperate to tell the institutional and the student success story in a better way.” While recognizing that future TRPs will need to hash a lot of this out if UR moves forward, the concerns they have “are not inconsequential.” It is “not so much the intent and design of what it is trying to do, but the whole host of attendant issues that it raises.”
Association of American Universities Data Exchange	Campuses have established numerous reports with a long history of data definitions and protocols. Many expressed concern of having to reconcile internal campus reports with NCES reports and “correcting” errors in the data files as identified by NCES. One could potentially generally three different answers to the same questions based on campus, system/state, or NCES data.
Bates College	One of the primary problems with the IPEDS unit record proposal is that it completely ignores the practical organizational, cultural, and training obstacles that would have to be overcome. Let me try to summarize some of the problems that will be faced by many of the smaller institutions, who would find unit-record reporting to be extremely burdensome and expensive. In spite of their good intentions, many small institutions will probably end up being forced to pay fines, because they will be unable to comply with the new requirements.
Bucknell University	One point, however, needs to be made very clearly: all burdens are not equal. A number of college representatives with whom I have spoken would be very willing to complete an additional IPEDS report on net cost, an option which entails data collection and reporting of the type with which we are familiar from other IPEDS reporting, and which is free of any associated risks.
Cardinal Stritch University	Submitting the data as suggested in the proposed student record layout would not create a significant burden for us, as we already have all that information available in our data system . . . Institutions will still need to compile all of the same reports that are currently submitted as most institutions still need to report these summarized data internally anyway. Institutions are highly unlikely to be willing to use the government’s summarized data, which will not include small values, for their regular internal reports. Most institutional researchers are intent on analyzing their own data. I myself won’t even use our own system’s canned reports as I prefer to work with the real data and analyze it in various manners for various needs. Using the government’s version of the data will not suffice for these reporting needs, even if the data summaries were available in a timely manner. This new process will not reduce the institution’s reporting burden, but will likely increase it.
Caspar College	This proposed data collection system will require a monumental amount of time and effort at all levels to make it work and I am not convinced that we will learn anything new about our students in the process.
Central Wyoming College	It would take months to input the data. If a standardized list of variables on each student could be agreed upon, the reporting parties could extract this data from their respective databases.
College of Notre Dame	Such a system of data collection would create an immense burden on the College of Notre Dame of Maryland.
College of Southern Maryland	In a period of reduced support and funding at the state level for higher education, some degree of sensitivity to this issue should be displayed by a delay or phased in approach to student unit record data collection by the federal government.
Columbia College Chicago	This change will have significant short and long-term impacts on the workload of several offices on campus. Most obviously, the IT department would need to develop the reporting mechanisms to generate these data files incurring set-up and training costs.
Concordia University Wisconsin	I am very comfortable with the current IPEDS data system, so the idea of making sweeping changes is a problem. After reading the descriptions of the proposed changes it appears they would require a lot of work and time.
Council of Independent Colleges	There needs to be a way to “help colleges of their size make the transition to UR,” especially with the double burden of the pilot.
DePaul University	From the research’s perspective there would be many aspects of a federal unit record system that would be extremely desirable.
Eastern Wyoming College	In theory, student unit records reporting could probably lead to long-term gains in the amount of time we spend responding to surveys and required annual reporting. However, I do not think there is anyone optimistic enough to believe this will actually happen.

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Financial aid administrator: large, public university in the Mid-Atlantic region	IPEDS needs to consider that this new level of reporting would add considerably to a set of institutional reporting responsibilities that include greatly increased state reporting, new and intensified grant reporting (the National Science Foundation, the National Institutes of Health, etc. all require far more statistical data and assessment than previously) and an ever-growing number of surveys and questions from the public sector that we respond to in accordance with the Freedom of Information Act . . . I guess I wonder if more time should be spent assimilating what we know and less in new data collection.
Financial aid administrator: large, public, four-year university in the Midwest	We heard NCES folks talk about using the financial aid data to show sample aid packages based on a family's guess of financial need. This puts schools in an extremely difficult position as we attempt to explain why the information they saw on the NCES COOL website doesn't fit their situation or represented last year's approach or any number of other possibilities . . . There is a real potential for these data to be naively misunderstood or even intentionally misused.
Financial aid administrator: large, public, four-year university in the Northeast	I agree that more thinking and discussion is needed (in that order) and I agree with the American Association of State Colleges and Universities (AASCU) who is supporting the feasibility study . . . In general, I think collecting unit record data for IPEDS is a good idea that potentially could contribute much to ameliorating the terrible state of IPEDS-based statistics.
Financial aid administrator: medical school in the Southeast Higher Education Data Sharing Consortium, Wake Forest University, Haverford College	It would be wonderful to have one central depository but the logistics of it could present some significant issues. We would also like to take exception with the contention that institutions view the burden and cost of such a collection of education records as a "tax" for using Title IV financial aid. We would remind [NCES] and others that Title IV financial aid is a benefit to individuals and not institutions. These individuals have already paid the taxes through their federal income taxes and have already fulfilled their responsibilities for provision of information through their applications for these benefits.
Houston Community College System	The proposed project seems to me to be too much done too fast . . . It seems to be popular of late to place ambitious projects on a fast track for completion. This unfortunately does not ensure success or quality. It is certain that the effort will be expensive, with much of the true cost being hidden in the budgets of thousands of information services budgets in colleges across the country. It is also certain that the effort will provide a veritable bonanza for consultants selling their services in support of the project.
Indiana University	The plain truth is that the programs necessary to produce the IPEDS components have already been created and leveraged as institutional reports, indicators, and decision support. With all their foibles, these surveys have become the currency for those of us that attempt to provide consistent metrics to higher education. More importantly, the data that under gird these measures are under our control; to be extracted, transformed, manipulated, and presented on our institutional schedules. As such, it is pure folly to think that we will no longer be tasked to do these reports but rather, simply supply data sets to NCES and wait for our reports to be returned to us.
James Madison University	Overall, the current proposal creates more burden than value. It also mitigates against the credibility of IR offices who need to deliver official statistics consistently and in a timely fashion.
JBL Associates	"Once schools get the data and use them internally, they see things about themselves and it helped them build a whole new agenda." The first implementation of UR for this project "came much more easily than thought."
Jefferson Davis Community College	UR will "help validate the role of community colleges in higher education, a role that is somewhat overlooked now and does not get the pre-eminence it deserves."
Laramie County Community College	I see several possible benefits for us, including being able to present a more complete picture of how LCCC impacts students. I also think that this proposed student level (unit level) data system will give us much more flexibility in terms of research questions. We can ask our own research questions and get national average dated data; now we are dependent on the summaries available through the current system. I disagree with Northwest's position that the current practices are "reasonably acceptable."
Lewis and Clark College, Juniata College	In moving to transactional data, NCES will put considerable stress on my institution's ability to verify its numbers. Additionally, I am somewhat pessimistic regarding NCES' ability to do its own verification of any statistics derived from such a database, given the lack of context for the statistics . . . I have used the recent tools proved by NCES to my institution. They are powerful automated tools. They are a testament to the amount of labor invested at NCES and my home institution in providing good comparative data for analysis. Unfortunately, the NCES model of one-size-fits-all works very poorly in the case of our institution. So, while there are wonderful graphs, many of them create misimpressions that take even more work to overcome. When this limitation is combined with the IPEDS penchant for "perturbation," much of the institutional benefit is lost.

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Marian College	I think it would be feasible for us to generate these files, though I am sure it would be very time-consuming and even painful at times. I think there are probably a million questions that will come up in the first year if they decide to do this—e.g., what to do with 2nd majors. At this point, I don't see how any potential value added to institutions in doing this could possibly match the cost and pain involved.
Maryland Higher Education Commission	There are certain benefits to analysis of UR data nationally, as it would allow tracking of students across State boundaries. The downside to this is the loss of individuals' privacy. This is a question that cannot be addressed by the panel. In addition, NCES policies would not allow states or institutions to work with the national UR data. This will limit the benefit to the states and the institutions while not offsetting the increased burden to them to collect this data.
Mount Mary College	The proposed changes to IPEDS that would require us to submit unit data would be an extreme burden for us.
National Association of Independent Colleges and Universities	Is UR so superior that it justifies the risks, burden, or costs to this than what we know now? We know quite a bit. Is this the best way to do it? There are all kinds of other factors that we don't have that much data on with how students get through.
National Center for Higher Education Management Systems	The proposal for UR "represents a real opportunity to reconceptualize the way enrollments are structured and measured. Credit and term are not adequate and institutions are already doing things to better define them."
National Association of Student Financial Aid Administrators	Despite these points, it is possible that the UR requirement will not be a huge extra burden for some campuses. Any problems will probably come from smaller public and private colleges that have just one or two aid office staff. These small offices (which tend to have just one or no IR office staff) may have additional costs or other burdens. The larger schools that have participated in the National Postsecondary Student Aid Study (NPSAS) or other major federal surveys that involve unit records probably will not have much difficulty with UR."
Northwest College	I am writing to state that our college does not support the proposal in any manner. Financial cost, time commitments, lack of personnel, technical difficulties, legal issues, regional accreditation issues, privacy issues, and reasonably acceptable current practices are the general grounds for our decision.
Northwestern University	We are reluctant to comment on the burden of the IPEDS student unit record feasibility study because we are fundamentally opposed to it. We believe from a cost/benefit standpoint that the costs to institutions far outweigh the benefits or demonstrated value to all stakeholders. We are concerned about the many nuances and institutional specific definitions of many of the data elements that could potentially be misinterpreted when the data are compiled and reported.
Occidental College	I believe that the unit record proposal is a bad idea, and that its proponents have not realized just how bad it is. I think that a few years from now, regardless of whether it gets implemented or not, people will look back at this time and ask "What were they thinking?" . . . If enacted, this data collection scheme will be a fiasco, initially. The burden on schools will be tremendous, and much of the data will not be valid. Eventually, those kinks would get worked out, but at tremendous cost in terms of resources—and in terms of the loss of privacy. A bad idea. It is a good idea to collect the data, but do so intelligently, by sampling.
Oglethorpe University	We are worried about declining data accuracy were we to move the proposed unit record reporting. Since unit record reporting will rely on the submission of transactional data and follow a coding scheme that does not fit our institutional system, quality checks on reported data will be costly and time consuming at best.
Oklahoma State Regents for Higher Education	I think there are benefits to the proposed system that outweigh much of the concerns here. The ability to actually have data on all students will allow us to really grasp at the real nature of the student experience. As Cliff Adelman illustrated in his recent work, students are not tied to institutions, nor state borders. If we are to truly know our business then we should seek better mechanisms for knowing it.
Shimer College	We are sure we are not alone in finding the proposed requirements: 1) immensely burdensome of personnel time and therefore of institutional resources; 2) potentially threatening to privacy and other civil guarantees to citizens; and 3) of no compelling value (indeed the opposite) in serving the public good.
St. John's College	By collecting one kind of data and not another, this causes policy makers to use those data and not others. This is the reason St. John's doesn't participate in U.S. News, because the college believes that higher education can't be quantified. "The more counting we do, the less context we have."
St. Lawrence University	The impact of the unit record system on institutional cost and burden will be excessive, with little to no additional benefit to the institution itself.
St. Olaf College	Most specifically there was great concern about increased burden—having to both run the summary data (as we already do) to check/clean the UR data as well as prepare the UR data in proper format

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
State Council of Higher Education for Virginia	There is a “huge, disparate collection of entities” and community colleges make up more than half. “There is no good, holistic model of what the benefits of higher ed are. We all think we know what higher ed brings to students, states, and the nation, but we cannot prove it.” While the UR won’t answer all of these questions, it will allow us to tell different stories about what is going on and there are a lot of unanswered questions out there.
State Higher Education Executive Officers	Current NCES surveys aggregate information from many sources. Despite substantial investments in reporting and analysis, these surveys are unable to answer these questions adequately. In fact, they lose track entirely of the progress of students who attend different institutions. The only way to accurately and completely answer these and other important questions is to collect and analyze a handful of data elements on all students over time, even if they attend different institutions.
Student loan guaranty agency representative	Collecting and maintaining student unit record data is clearly practicable, and such data would no doubt yield a wealth of useful facts and figures about higher education. But just because we can do this does not mean we should do this. Such a project would no doubt impose a large and complex reporting burden on institutions.
Towson University	The NCES proposal to redesign IPEDS to collect student data through individual student unit records offers the federal government the potential to provide a more valuable source of information than the current aggregate reporting method, particularly in the area of outcome assessment and cost of higher education. It is imperative, however, that the cost of implementing a system of this magnitude does not outweigh the perceived benefits . . . This initiative will impose a heavy financial and resource burden on our institution to create a database of information that could jeopardize the privacy of our students. Furthermore, it has the potential to seriously compromise the validity of data that institutions are routinely required to report.
United Negro College Fund	"Every year there is more and more reporting," requiring schools to send more and more data. "When will it stop?" "Will the end game be beneficial to some?"
University of Colorado at Boulder	"Full-time enrollment" is the most difficult thing to determine about a student—full-time for tuition, for financial aid, for this degree program, for residence halls, for . . . That makes me shudder when the goal of analysis is stated as rates of this and that for full-time and part-time students, as if they are two separate groups with some qualitative difference between them.
University of Kansas	While schools see the benefits of UR, they have not pursued better numbers because they can’t afford to track students this way. In other cases, the cost is greater than the perceived benefits and would cut into instructional activities.
University of Maryland, Baltimore County	This unfunded mandate would be costly and burdensome to the campus and would provide questionable data for the uses planned by the federal government. We do not believe that the data generated from this project would answer the kinds of questions outlined by NCES.
University of Maryland Eastern Shore	The impact of the student unit record system may not be fully appreciated prior to implementation of the proposed change in data collection.
University of North Carolina	IPEDS UR has the potential to allow us to study the timing of student decisions and the process of acquiring credentials. Low-income students and those without enough financial aid are forced to drag out going to college. “Timing is a key issue.” One of the central issues is “how to deal with non-traditional students.”
University of Wisconsin System Administration	While we recognize the importance of the issues driving a unit record data collection we have not been convinced that this is either the appropriate or adequate vehicle to address these policy issues. In addition to policy concerns, we have conceptual, practical and technical considerations. . . . At a theoretical level this proposal would seem to address the major policy issues plaguing the higher education community at the federal, state and local levels. However, the details, costs and implications are serious enough to warrant further discussion prior to advancing the proposal in its current form.
University System of Maryland	The current discussion has ignored serious flaws in conceptualization and generally underplayed the considerable costs and obstacles to the successful implementation of the system. Most importantly, we do not believe that the data generated from this project will be able to answer the kinds of questions that NCES has outlined . . . As this system is currently proposed, no outside group or agency, including the university or college itself, will be able to validate the accuracy of the data analysis and research released about an institution. The IPEDS data set (concerning an institution) will exist only with NCES, and will compete directly with institutional and state data-sets when any discussion of the institution takes place. This IPEDS data set, for all the reasons discussed above, will not be the most accurate. These data will be non-contextualized, unconfirmed and not trusted by higher education.

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Villa Julie College	The proposed unit record system will impose significant administrative burdens on Villa Julie College . . . For an institution of our size, the reporting requirements will generate a massive amount of additional work where administrative resources are already stretched thin. The format in which data will be requested is likely to be more sophisticated and expensive than the systems the college currently uses. The study and implemented program foresees multiple data submissions each year. The likelihood that ongoing individual data errors or anomalies will be identified and require resolution adds to the burden. The assurances by the Department of Education that any additional burden will be initial only, and not ongoing, seems optimistic given the multiple submissions each year. Data “cleaning” will be an ongoing effort. One expert on higher education data collection advised that it is reasonable to expect at least a 5 percent error/anomaly rate each year for unit record data.
Washington University	We could comply with unit record reporting without a significant increase in reporting burden if the privacy/SSNs problem is solved. That is no trivial matter.
GRS data	
Maryland Higher Education Commission	The proposal also identifies the awkward and huge burden that would be required for the institutions or States to report back data (as much as 6 years worth) for starting up the unit record system to handle the Graduation Rate Survey (GRS). This would also need to be provided the first year along with the new UR requirements. A better methodology needs to be developed to phase in the GRS based to IPEDS UR.
Montgomery College	The catch-up submission of GRS support data will be a considerable effort.
Paine College	We would have real difficulty due to software conversion projects, especially retrieving data that are five or more years old for GRS cohorts.
Shorter College	I could already provide numerous cohort files, as long as they could be uploaded in Excel.
University of Maryland Eastern Shore	The back fill data for six years will present us a serious challenge in terms of availability of such data. Beginning fall of 2003 we changed our database from the Legacy system to PeopleSoft. Moreover, the way and the type of data collected over the six year period emphasized freeze data to be reported to the Maryland Higher Education Commission that was aggregated and did not include course level data. Thus finding appropriate level data will be a major challenge.
University of Texas system	The Technical Review Panel (TRP) for developing these files will have to rethink the alignment between the Completions (C) and GRS. The two need to be aligned, since they are based on the same data and timing.
Implementation	
Bates College	The desire to accomplish the unit record reporting system all at once, rather than implementing it gradually, is very perplexing. The decision to bypass the Office of Management and Budget (OMB) clearance process and not do a survey to estimate institutional burden or cost suggests an unwillingness from IPEDS to consider institutions’ genuine concerns about a proposal that will have far reaching implications for the very nature of student data reporting. It has not been made clear what overreaching issues of urgency require such a system to be implemented at once, and retroactively, in the case of GRS reporting.
College of Southern Maryland	NCES is moving forward in developing a reporting requirement but a plan for report format, fields within the reports, and definitions of the data elements has not been created. Field testing in 2005 seems impetuous.
Community College of Baltimore County	Of critical concern is the increased burden given the timetable for implementation. The proposed schedule will negatively impact the institutional research, the information technology, and the enrollment management departments. Central to this proposal are major changes in the processing and handling of student records data. The current timeline does not provide sufficient time to adequately plan and implement changes of this magnitude. Allotting additional time between the pilot study and the full implementation would allow for the final requirements to be provided to the institutions well ahead of implementation. This would provide more time for staffing and technology upgrades to be completed before the full implementation.
Eastern Wyoming College	The major challenges would be the workload in the implementation of the new requirements. It would require four years of student data (current year plus last three), including all the financial aid information, at the start-up phase. The personnel costs and training costs to do this would be extensive.
Financial aid administrator: large, public, four-year university in the Midwest	We believe that it significantly increases the institutional reporting burden, especially in the first few years of implementation. We’ve yet to see any new initiative put in place without lots of back and forth work between the contractor agency and [the university]. Having one of the larger populations in the country, this is not trivial.
Houston Community College System	If implemented, I would suggest that a more gradually phased-in model would be preferable with adequate testing to ensure data security and accuracy.

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Howard Community College	We recommend that a secondary review process be considered, one that incorporates further input from institutional researchers, admissions officers, and information technology experts from all higher education segments, including community colleges. The proposed timeline for implementing this initiative needs to be reconsidered as do many of the details of the present project design.
Lewis and Clark College, Whitman College, Juniata College	With the massive potential for bugs, at both the institutional and federal levels, five to seven years seems a more reasonable estimate of the period of disruption and unreliability in the aggregates rather than two or three. (Just look at the time it's taken for NCES to streamline the web-based IPEDS collection.)
Maryland Community College Research Group Maryland Higher Education Commission	Structural changes of this nature require more time than the current plan so that appropriate resources can be acquired. The proposed implementation schedule is far too tight to allow time to prepare, test and implement. Typically unit records systems take three to four years to roll out depending on complexity not the one to two year period proposed. Institutions and possibly States will need one year of training and preparation time to modify their systems and procedures. One year is spent on doing a test or pilot at a few institutions. NCES intends to pilot a 25 percent on the institutions in the country and the test will be required of the institutions under current federal law. This could be very burdensome to institutions that have weak systems and limited resources. We have found this to be true at small independent institutions here in Maryland as we implemented the state UR systems. It also constitutes a mandatory shortening to one-year the time for the institution to implement.
Montgomery College	Both the implementation and the feasibility study are on a timetable that is entirely too rushed to permit adequate review and development—at the institution, state, and NCES levels. At least one additional year prior to the feasibility study should be inserted, and universal implementation should be postponed an additional year to permit accommodation of the feasibility study's outcomes.
University of Colorado at Boulder	Startup (internal definitions, agreement within system, work on state UR system to match, programming, modifying numerous internal processes to match new definitions): an estimated 100-200 hours of director time plus 200-400 hours of staff time. Maintenance: probably no more than now.
University of Maryland, Baltimore County	The proposed implementation timeline is aggressive, not allowing for careful planning to avoid data problems and resolve privacy problems, and it would divert campus resources from other planned efforts.
University of Miami	The advantage with the delay for institutions is that they have more time to implement UR submission.
Matching records	
Association of American Universities Data Exchange	Almost all who responded indicated the difficulty of using SSNs to match data files. A 10-25 percent error rate for mismatches using SSNs is not uncommon. The cleanup associated with correcting bad or missing SSNs is very labor intensive and would require additional campus resources.
DePaul University	The one that concerns me the most is the second one of having to reconcile "discrepancies" NCES finds with the data submitted. This need to clean up data will most likely require we reach back into our databases and force us to spend tremendous amounts of resources to match other federal records or records from other institutions and to do so in a manner that adds absolutely no value to the quality of decision-making at our institution.
Dickinson College	The change process will be difficult, especially at small colleges where there are data integrity issues, fiefdoms, and silos of data that make it difficult to match records. It is "hard to get the culture changed, but it is part of the burden."
Eastern Wyoming College	Mismatches on SSN or any other student data would have to be resolved by each institution, which will be very time-consuming. A student who does not want to give us a social security number is allowed an option here, for example, but then that student may use another option at another educational institution. How we match up those student records could be a nightmare.
Rensselaer Polytechnic Institute	Our institutional research office currently consists of one person, the director, and that person is currently the IPEDS keyholder. According to the proposal, it is the IPEDS keyholder that must resolve all mismatches in the data submissions; this will place a substantial burden on this one-person office.
St. John's College	St. John's has never used the Social Security Number as a student identifier and, instead, have always elected to use a computer-generated number in order to protect our students' privacy. The proposed collection system would be in direct opposition to our long standing college policy on this issue.

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
University of Maryland, Baltimore County	UMBC, like other University System of Maryland campuses, assigns a temporary SSN/identification number to international students, until they receive their official SSN. This will affect any matching that NCES tries to do for these students. It is possible, and likely, that other institutions would assign the same temporary number for some of these students. This will be an even greater problem as we move away from using SSN as the student identification code. In the new PeopleSoft system, we will be using a different unique code (unique to UMBC only), called EMPLID. Only students who apply for federal financial aid will be required to submit their SSN.
University of New Mexico	When I report aid to students I match a census file against the aid file to see what they were awarded—but this is always different than the total aid awarded, for all the reasons given above. We even have the issue of students being enrolled at more than one of our campuses, and receiving aid from only one campus—associating the aid with the campus enrollment is tricky, and sometimes more of an assumption on my part than actual data. Because we report enrollment as of "census" date (even our end-of-semester file captures only students enrolled as of each course's census date) there are always awards that don't have a corresponding record on our census files. Of course, we have transactional institutional records that show all enrollment, but that is very different data than we've reported to IPEDS in the past . . . It simply isn't easy to merge financial aid and enrollment data together, especially for campuses like ours where we have one financial aid office for all five campuses, but where we report our enrollments, and all other IPEDS data, as if we were five separate campuses.
University of Oklahoma	4-5 percent missing SSNs is still a million students, with a million little research projects that NCES and schools would have to do. While there are a lot of good things that could come out of the system, it involves passing a lot of SSN work to the schools . . . This burden should not be trivialized and that while some of it is due to transposition from data entry errors, there will be many other sources of error.
University of Wisconsin - Madison	The UR IPEDS will make use of SSN to track students between institutions. At UW-Madison we have moved away from the use of SSN as key identifiers because of a state mandate that the SSN not be used as an identifier in higher education. We do not require that students provide a SSN if they don't apply for financial aid, so we don't have SSNs for all students. Plus, people change their SSN, so those changes have to be accommodated.
University System of Maryland	Our institutions are currently moving away from SSN as an identifier. This process has accelerated as new data systems have come online and concerns about identity theft have increased. The proposed data collection system will create major problems with student tracking and will require dedicated staff time to resolve.
Washington University	The follow-up on un-matched records has the potential to be extremely time-consuming for institutions.
Staffing	
Alabama Department of Postsecondary Education Association of American Universities Data Exchange	Institutions will be burdened with additional staff and staff training needs. Many of the institutional burdens were outlined in your summary of the second TRP meeting. Until more details are known, it is difficult to estimate the true institutional burden. Preliminary discussions, however, suggest that for IPEDS reporting obligations currently completed by system offices would need to be transferred back the campus. Private institutions have also reported large burdens to "gear up" for such reporting. Estimates of institutional burden have ranged from 600 hours per year to of one or two additional FTEs to "10 times what went into SEVIS" reporting obligations. Some have also indicated that unit record reporting would move IPEDS responsibility out of IR and into IT and operational departments.
Bates College	In many smaller institutions, student IPEDS reporting tends to be done by the registrar or by the person assigned to institutional research. Many institutions do not have full-time institutional research staff, or the role may be relegated to a primarily clerical role of coordinating data collection as the IPEDS web coordinator. Often the person is a half-time faculty or staff member, with many other competing duties. At our institution, we have long had difficulty in hiring and retaining the types of people with the skill levels required to do the more sophisticated reporting envisioned by IPEDS. (We also have de facto hiring limits, so adding staff to address additional reporting burdens is not feasible.) Developing the systems to address an IPEDS unit record mandate will force us to shift a significant portion of the resources of our 2.5 FTE staff IR office away from other mission-critical efforts in our job description, which include: accreditation support; outcomes assessment and institutional effectiveness activities; planning and research assignments for college administrators and faculty committees; enrollment planning. We are very fortunate that we have more staff than most small institutions, but the extensive task list mentioned above is not uncommon for others who coordinate IPEDS reporting . . . Many of the staff in the offices that will need to be involved in unit record reporting do not have access to or adequate training in the reporting tools that must be used to integrate the data.

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
College of Notre Dame	It would be necessary for us to expand the institutional research office, which is currently directed by a half-time person, in order to accommodate the additional reporting requirements that would occur multiple times during the year. I would find such a shift in resources unacceptable to the overall health and future stability of the college, especially since the benefits are questionable.
College of Southern Maryland	Once colleges have a functional description of the system, each institution will need to devote a large, and yet unspecified, amount of its resources in the form of programming, analytical support, and testing for development.
Colorado College	I am concerned about the financial costs—both computer capacity and staff capacity—to my institution to report data in this fashion.
Columbia College Chicago	The Office of Financial Services currently undergoes two major, federally mandated audits during the year that require extensive amounts of staff time and energy. This requirement would add to the Office of Financial Services reporting burden and repeat the information that is already reported to the federal government. In addition, work would need to be done to further integrate student accounts and financial aid data with the enrollment files.
Community College of Baltimore County	It is reasonable to assume that the initial start up costs will include additional personnel, possibly additional software, and changes to current processing of student record data. Structural changes of this nature require more time so that appropriate and adequate resources can be acquired.
Financial aid administrator: large, private, four-year university in the Southwest	I believe that it would not be difficult to provide this data, since it resides in the student information system. A programmer would be needed to write a program to extract the data and put it in the required format. It will take time to run the reports and send them to NCES, therefore it will require some additional staff hours to complete the task.
Financial aid administrator: small, private college in the Southwest	The response from our IT department is that this kind of report would be a low-impact project from the cost perspective. It would be simply staff time to develop a script to extract this information from our system.
Howard Community College	Whether for the pilot or for the official start of the project, the imposition of a substantial increase in employee workloads will stretch our current staffing levels to the breaking point. We can provide more information, if you need it, about the problematic nature of the integration of cost and financial aid data with our current student information system, the major potential mismatches with the use of Social Security numbers, and impossibility of applying the new race/ethnicity categories to current and former students. Ideally, a full-time staff member in admissions, another in information technology, and a third in institutional research would be needed to initiate this system. Budgeting for three new positions (a cost of at least \$150,000 annually) to address this initiative is not feasible now or in the foreseeable future for our institution.
Indiana University	My estimates of burden were based upon extensive discussions with my programmers regarding the potential data elements required, types of files to be created, and the prospect of providing verification for SSNs mismatches and data anomalies. The per hour rate (\$50) is the current price for technology related services, and is a good proxy for this type of work. Since we will be responsible for multiple campuses I believe there will be an "economy of scale" in effect but will still require additional time, hence the use of the multiplier. Of course, with so many unknowns, it's exceptionally difficult to feel comfortable with such estimates but I do believe that these are conservative views on the potential burden.
James Madison University	None of our current programs are likely to meet the IPEDS standards and new ones will have to be rewritten, tested, and monitored for annual updates. The data keys proposed by IPEDS UR are also very different than the current programs, requiring separate programs. I estimate that one FTE staff for at least one year will have to be diverted from other important work in order to create the new data programs. Again, this estimate is based on my experience with rewriting all of the State Council of Higher Education for Virginia (SCHEV) programs during the conversion to PeopleSoft systems. The time gained by eliminating web entry into the current IPEDS collection is likely to be more than offset by complexities involved with multiple uploads created by IPEDS edits. Presently, a graduate assistant can enter the web form data. A higher paid staff person will have to manage the more complex UR system uploads, edits and management of edit data returned.
Johns Hopkins University	The IPEDS unit record proposal will at least double the current reporting burden because it increases the number of file submissions, increases the difficulty of reconciliation, and expands the scope of data collection. The time that will be devoted to federal reporting by offices that are already stretched too thin will require the addition of full-time, technical staff . . . All available IT and functional resources are already committed to the implementation tasks. We would have to hire and train new staff, or hire consultants at higher cost, to handle the additional workload.
Lewis and Clark College, Whitman College, Mills College, Juniata College	The amount of human power and financial resources forced on the institution by the system currently described are enormous. Our institution does not currently have sufficient computing or human resources to address even the most conservative data demands outlined in the current proposal.

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Marian College	Costs to the facility to generate these files include: weeks, possibly months of total time from the Director of Institutional Research and the System Administrator for college information systems. Both offices are very lean in personnel and will have great difficulty in achieving other needed work during that time. It has long been a goal to integrate some of the currently separate systems, which we might have already begun if we weren't always behind. We really cannot afford to hire another person to help with those duties, but that is what would be needed.
Maryland Community College Research Group McDaniel College	It is reasonable to assume that the initial start up costs will include additional personnel, possibly additional software and changes to current processes. Although institutional burden is an issue secondary to student privacy, it is nonetheless a very real issue to us and institutions like us. At McDaniel College we have a one-person institutional research office (as do 14 of the 18 MICUA member institutions), to complete the ever-increasing mandatory reporting, as well as surveys from publishers and the institution's internal data needs. Further, we have only one database administrator for the institution who would have to do any programming necessary to meet the requirements of such a collection. The burden to the institutions would be great.
St. John's College	It's a fact that office staffing is thinner in smaller colleges. Institutional researchers very often wear other hats and find their time limited by numerous obligations to the college. For these reasons, implementing a data collection system on this scale would be especially burdensome for small colleges.
St. Olaf College	Although our computer system contains most of the information the proposed plan would require, the amount of staff time needed to pull together all the information would be excessive. With tight budgets, we simply do not have the staff required to generate the type of detailed report this proposal would require.
State Council of Higher Education for Virginia	"Most edits have to do with making sure financial aid and enrollments are both merged properly." The Association for Institutional Research (AIR) community has had numerous training opportunities over the years to try and help practitioners develop these skills in using and merging datasets and there are "no secrets on integrating this." There is a wealth of material on this standard in IR and AIR has an IPEDS grant to conduct "train the trainer" sessions. This need will only get bigger if UR is implemented.
Towson University	The anticipated increased IT workload related to the proposal is by no means trivial as indicated by the resource estimates. Although the technical skills required to write the interface program(s) are not expected to be demanding, the real expense will be in the analytical skills required to: (1) analyze the mandatory specifications; (2) map and design appropriate translation business rules; and (3) test and reconcile invalid interpretations and assumptions. These costs will not only be incurred during the initial implementation phase, but will be realized for all succeeding years as the IPEDS specifications evolve over time. If modifications are necessary to our Peoplesoft student data structure, this will impose a greater burden. Additionally, if personnel and resources are redirected from organizational initiatives designed to reduce operating expense and/or improve services, those cost savings to the institution will be lost.
University of Maryland Eastern Shore	It would be difficult to implement a change of this magnitude without additional resources. These resources will be in the form of additional personnel both for short term and for ongoing tasks and for additional equipment.
University of Texas system University System of Maryland	This reporting will be a significant burden to our staff and they are already stretched thin. The transactional nature of the proposed system would require constant "cleaning" and reconciling of the data, which can only be accomplished by dedicated personnel. The lack of census dates and the proposed flexible reporting calendar changes data reporting from an episodic to a continuous activity. This, of course, adds to the cost since most of our institutions would have to hire additional staff.
State/system unit record systems	
Association of Advanced Rabbinical Schools	Where are the good educational outcomes of unit records? Where is the comparison of states with and without UR in order to see whether there was a difference relative to achievement? Where are the objective pieces of evidence that show how valuable it is on a national basis? There is no clear justification for the importance of undertaking this collection of UR . . . Where are the examples of wise policies and educational outcomes that they will gain with the national UR?"
Brazosport College	Will the state (re: unit record collecting by NCES) be able to do that for us? Our Coordinating Board collects unit records already and it would help if we wouldn't have to duplicate this process. If more data are needed, the state could simply add it to the list of items we submit—a whole lot easier than programming an entire system to satisfy a new requirement for data.
College of Southern Maryland	The requirement to report student unit records on a transactional basis will result in 6 to 10 submissions each year. This is unrealistic given the existing resources of most colleges. Institutions in Maryland must also provide Student Unit Records directly to the Maryland Higher Education Commission on a periodic basis, thus increasing, rather than reducing, the amount of data flowing between educational entities.

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
DePaul University	At a very functional level, also as a researcher, it is obvious that many states including Virginia (where we worked . . . to institute the UR system in 1992 have student unit record systems. It would seem obvious to me that if in fact the benefits of unit records are real, then these states would have better institutions, better educated students, and better state-level educational systems with better levels of financial support. I can only wonder why data supporting this advantage over those states that do have unit record systems was not brought forth by my colleagues from New York, Virginia, and other similar states. Can State Higher Education Executive Officers (SHEEOs) from these states show better outcomes from analyses of their data? I am thinking about more than them being able to do more complex studies by themselves. But while on the topic of states the question does occur for those states that already have unit record systems, will the institutions be required to provide data for both record systems or will the states be required to use record systems that are consistent with the federal government.
Financial aid administrator: community college in the Midwest	Our state requires the two-year community colleges to college this data already. I'm uncertain if they require the same of the four year regents and the independents. For our Community Colleges there would be no additional costs, nor additional staff needed.
Financial aid administrator: community college in the West	In our state, we already report much of this data to our Chancellor's Office. Our state MIS submission is an important IT function that already involves a lot of staff and system time. Duplicating this effort to report essentially the same information in a different format to a different agency is costly and inefficient. We would request that this information be collected from state agencies in states that have already these data elements reported to them. It might also be easier for IPEDS. For example, in our state they would be working with just our Chancellor's Office rather than our individual colleges.
Financial aid administrator: large, public university in the Mid-Atlantic region	First, in our state, we already do unit record reporting . . . while the edits are onerous, it does provide a good, consistent (to the extent possible) database for description, evaluation and inference testing. Once you get in the hang of it, other than the edits (and at least in our state, they're bad b/c the database is not quite robust enough to accommodate permutations of student enrollment/student financial aid as well as the edits could be more sophisticated) . . . it's ok.
James Madison University	Because requirements of the state and proposed federal systems are not aligned in this proposal, at least two programs will have to be updated instead of one with every change in external requirements or internal system changes, thus doubling the maintenance requirements that currently exist for the SCHEV data files . . . The proposed system will also make completion of official data in state systems a greater burden. Because there is no synchronization between state and federal requirements in this proposal and current plans call for edits which state systems cannot predict, institutions are likely to increase the amount of time spent revisiting state record submissions after federal edits drive data changes. The opposite can occur if institutions submit to federal systems first. The prospects of a "federal-state edit loop," where edits in one system create edits in the other, needs to be closely examined for this proposal.
Maryland Community College Research Group, Wor-Wic Community College, Maryland Association of Community Colleges	Currently, the Maryland community colleges provide data to the Maryland Higher Education Commission and the Commission uploads Completions, Student Financial Aid, Staff, Employee by Assigned Position, Enrollment, and GRS data into IPEDS for the community colleges. With the proposed unit record changes, individual institutions will report this data separately to the state and to NCES. Along with transactional file updates . . . institutional burden will greatly increase.

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Maryland Higher Education Commission	<p>The use of IPEDS UR would probably disrupt the valuable cooperative data process between institutions, states and IPEDS. Still more issues will result in increased burden to the institutions and even to the States... The burden to the institutions will be enormous. The burden to the states will also be very significant and may cause many states to reduce their role in coordination of IPEDS. It is highly unlikely that most States will be able to manage the proposed multiple submission requirements of IPEDS, modify their systems to accommodate these submissions and support the resolution of errors. Many states (Maryland included) would be unable to support the new IPEDS UR requirements with their current systems. Most of these systems are designed upon well-founded principles to collect statistical data about enrollment, degrees and financial aid. These systems are already integrated with IPEDS components and provide a tremendous benefit of establishing consistency across state and federal level. This will lead to a problem for the states to continue their systems in addition to the new IPEDS UR. It was felt that the loss of these systems would have a detrimental impact on the states in meeting their specialized needs and reporting such as state accountability or high school graduate performance feedback. Some of these needs were established by the legislatures or statutory bodies. This would lead to increased burden to institutions to report to both federal and state same data different ways. Most States (including Maryland) would also be unable to handle increased burden to process both their systems and the new federal IPEDS UR. The federal UR system is an ongoing data collection occurring throughout the year not just annually. States would be required to piggy back on the multi-submission schedule with their own data elements in order to reduce the double reporting burden on institution for separate federal and state UR systems. States will need increased resources to modify their systems and process the multiple submissions. It appeared that NCES had not factored in the enormous effort and costs to states and institutions to implement an IPEDS UR. They were more focused on their technical abilities to implement the system at their end. Since they have policies that do not allow outside access to the UR data, the states would not achieve the major benefits from such a system. NCES would need to make sure they provide adequate resources for special analysis of this repository of data needed by the states. There will be only three real choices states could adopt to live with an IPEDS UR system: (1) dual state and IPEDS UR—states continue to run their own systems. Institutions will additional burden to report both UR systems; (2) combined state/IPEDS UR—states would be required to retool their systems to adopt to the multi-submission requirements of IPEDS and integrate their data needs into the IPEDS format; and (3) disrupt state systems—states may be pressured into shutting down their own time proven systems and lose valuable analysis tools.</p>
McDaniel College	<p>We recently had a similar debate at the state level with the Maryland Higher Education Commission (MHEC). We came to a compromise based on three points: 1) MHEC agreed not to collect unit record data on students who are not receiving state aid; 2) they don't use Social Security Numbers as a unique identifier on students who are not receiving state aid; and 3) MHEC developed a secure way to transfer the data.</p>
Minnesota Private Colleges Commission	<p>Though fully committed and coming with mandates, the schools "didn't recognize the benefits until they got over the trauma of how to fit it within their regular work and manage it with their IR people."</p>
Montgomery College	<p>Integration with existing state systems (such as in Maryland) needs considerable review and assessment to reduce conflicts, overlap, and incompatibility. Also, more time will be needed to determine and implement necessary adjustments.</p>
National Center for Higher Education Management Systems	<p>The states have an enormous amount of wisdom in this" and there is a "lot more commonality in these systems than believed" . . . The calculation of graduation rates for states is recognized to be flawed, and UR will allow for much better calculations to be made. "The absence of data leads to poor policy decisions."</p>
Oklahoma State Regents for Higher Education	<p>Many states, including Oklahoma and Georgia, provide extensive support for IPEDS submission to institutions, thus the unit record data is not a problem. Unit record data could, in the long run, reduce the reporting burden to the institutions. By the way, Oklahoma assists the private institutions with IPEDS submissions. States that have state-wide unit record systems have had no difficulty in addressing the issues that were outlined in the boilerplate letters.</p>
St. John's College	<p>Regarding institutional burden in order to comply with the proposed collection system, the Maryland Higher Education Commission implemented a unit record data system under which the Maryland independent colleges submitted data for the first time this fall. MHEC is only tracking Maryland students who receive state aid. Submission of this small amount of data required several hours of work on my part and our Information Technology office. It required several edits and communication back and forth between the college and MHEC.</p>
State Council of Higher Education for Virginia	<p>Unit records allow us to tell stories and explain the complexity of the system that we couldn't otherwise.</p>

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
State Higher Education Executive Officers	NCES will submit a report to Congress in early 2005, which is expected to recommend steps toward the development of a national student unit record collection system. SHEEO supports the design and implementation of such a system.
State University of New York System	"If you can do it in New York, you can do it anywhere."
University of Colorado at Boulder	Obviously would be far better for a state and its institutions if state UR matched federal UR. Some clearly do not. Seems as if these differences might be fruitfully studied.
University of Texas system	If it all plays out, it is important to ensure that "data at the state and national level are consistent so they tell the story consistently the same way, or we may end up with more dissatisfaction."
University of Wisconsin - Madison	Wisconsin is listed by HigherEd.org as one of the states that already has a unit record data collection. Thus, many assume "we are already doing this" and so the transition will be of little consequence. That's not a complete picture. The UW System Administration collects the Central Data Request (CDR) for analytical—but not transactional—purposes. This CDR is used as the basis for UWSA to provide student record IPEDS reports for all UW's. If the UR IPEDS format includes enrollment files, completions, and financial aid information similar to the CDR, then the administrative burden may be similar to the burden imposed by the current unit record reporting requirements to UWSA. In the first few years, a considerable effort would be required to develop and program the system. The effort would include people from the registrar's office, student financial services, admissions, academic planning and analysis (IR), information technology, and perhaps some other offices. In the first year, it would draw staff away from institutional priorities directed to serving students. In the long run, the ongoing effort may be somewhat equivalent to the CDR; we devote considerable resources to checking, editing and verifying the CDR data, and in maintaining the system. However, the current proposal suggests that the UR IPEDS submissions will require more information than in our CDR model. UW System has indicated they will be unable to support our IPEDS submissions if the tuition information is included and if the UR IPEDS has transactional features.
Wyoming Community College Commission	In general, this proposal will help the Wyoming Community College Commission (WCCC) by making new kinds of data available to the state-level agencies. We support the general idea, however, we do acknowledge the concerns of the Wyoming community colleges and support their points of view.
Subsequent enrollment redisclosure	
Association of American Universities Data Exchange	Support for the proposal could be increased if institutions saw a value-added component to the reporting obligation. That is, if institutions could receive back from NCES information on where their students transferred to or enrolled in subsequent colleges upon graduation (e.g., where they went to graduate school), there would be greater institutional support for this proposal . . . If the proposal is implemented, there is a very strong desire for institutions to receive information back from NCES on their former students. For those students who transferred out or graduated from our institution, what institution did they go to, did they receive a degree from that institution and what type of degree (BA, MS, JD, Ph.D., etc), what degree program (major) were they in, etc. Campus would need unit-record data, not aggregate reports produced by NCES.
Caspar College	As I understand the proposal, one of the main goals is to be able to track students across institutions and state boundaries. We already know that many students do not graduate from their initial college or university—they start and stop, they drop to part-time, they enroll concurrently at multiple institutions, etc. I suppose that the tracking information will be interesting, but I don't see the real value to decision-makers in documenting known practices. Also, unless changes to FERPA are included with the proposed legislation, IPEDS cannot return information about individual students to the colleges for our internal use.
Central Wyoming College	It would be extremely useful to see what other higher educational institutions students have transferred to, what their program of study is or was, whether they have graduated and with what degree. This provides any institution with an excellent evaluation tool for program review purposes.
College of Notre Dame	College of Notre Dame already posts very strong graduation rates and this proposed initiative would only enhance the rates experienced by students who begin their college career with us. I am not concerned about what the "new" data would show.
Colorado College	To be fair, I am attracted to the proposed change for the ability it affords for institutions to track former students (both alums and drop-outs) after they leave us.
DePaul University	If participating in this activity of providing student unit records does not help us do our other task then it will most likely suffer as do other things which are mandated but seen as worthless to the University. It is within recent memory that NCES and IPEDS started providing useful data back to the institutions and it is obvious that this support coincided with a major improvement in the quality of the data provided by the institutions.

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Eastern Wyoming College	<p>The advantages would relate to the increased quality of data related to transfer, graduation rates, persistence rates, and college costs. Ed Boenisch is quoted in the 12/7/04 Community College Times as supporting the proposal, since it would track every college and university student's progress. Currently it is particularly difficult to track students who move from one institution to another . . . The catch is that under the current law NCES cannot return record level data back to the individual colleges. That means we have the extra burden but receive little in return. However, if redisclosure of the information is specifically included in the Higher Education Act Reauthorization, then unit record data may be redisclosed to the colleges. It appears that the Dept of Education is in favor of giving unit record data back to the colleges and is willing to support the necessary wording in the reauthorization act. . . . I think we can safely assume that the submittal of the data to NCES in this proposal will be significantly more time consuming than the current IPEDS reporting system. However, if we can get detailed unit record level on each of our students such as transfer and degree completions at other institutions, then we would have useful information that is not currently available to us. I can get some of this information from the National Student Clearinghouse, but it is not complete and does not include all of our students. However, we will still have the benefit of receiving our graduation rates calculated by NCES. They will have access to all transfer and completions at other institutions, so in theory we could show a higher graduation rate.</p>
Financial aid administrator: proprietary school in the Midwest Financial aid administrator: small, private college in the Midwest	<p>Our school is very much in favor of creating an industry standard collection instrument that institutions can complete as well as draw data from. We do not have the internal support to provide that kind of data . . . I struggle with doing the National Student Clearinghouse submission and that is supported by Datatel. For us to provide all of the information requested would require massive programming and we don't have the internal support to do that.</p>
Goucher College Howard Community College	<p>It is important to have this redisclosure of the data and that it is "very important to know." Although a considerable burden will be placed on institutions to provide detailed data to NCES, colleges will not receive useable data about their students in return. The one-way flow of data may answer some questions about costs and transfer patterns at the national level, but it is at the institutional level that the data could be most useful. Without the flow of data back to the schools, there will be a sense of a tremendous amount of expended effort for no payoff.</p>
James Madison University	<p>While some transfer and post graduate enrollment data might become a reality, the detail of returned information is insufficient to explain "why" a student transferred or "what" a graduate could tell us about the value of their JMU degree. Without knowing "why," the data provide little for the institution to effect change. Institutions need detail sufficient to survey their transfers and graduates. I am also skeptical that privacy laws will be amended to the degree that any detailed information is returned at all.</p>
Marian College	<p>IPEDS asks for things, such as transfers out of our college, that we don't have and can't get without paying a fee to the National Student Clearinghouse. While we have made submissions to the Clearinghouse, our normal data storage does not easily produce the needed file format, so we don't do this on a regular basis. Typically, we haven't reported those things to IPEDS (such as transfers out) that we don't have a normalized method of capture. Even when we do have time and ability to submit to NSC, which is not every year, we don't maintain it with our student data systems and would have to merge it into a new file.</p>
Montgomery College	<p>If the institutions are permitted no access to the additional data obtained about "their" current or former students, there is no benefit for the colleges in this process, and no opportunity to reconcile potential inconsistencies.</p>
Springfield College	<p>She and other institutional researchers really need to know why students are dropping out, that they "have to know that."</p>
State Council of Higher Education for Virginia	<p>There is a "lot of legislative support for looking at what happens after they graduate." The legislative money committees and education committees want to know what happens to students, inside and outside of the state.</p>
Temple University	<p>NCES should reconsider its stance about sharing UR data with the schools on what happens with their students. One of the benefits of using the National Student Clearinghouse is being able to evaluate how effective schools are and evaluating student experiences. "Please reconsider doing it." . . . This would be "very good for institutions to have an effective program. If you are going to have UR, it is a marvelous opportunity to improve higher education. It impedes that opportunity if it is only one-way flow" of data.</p>
University of Colorado at Boulder	<p>I agree with many discussants that getting the data back, in UR form, would be incredibly valuable for institutions and for states. No one is going to want to go through all this simply to allow one and only one agency to have UR data for analysis. No amount of creative aggregate reporting could replace the UR data.</p>

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
University of Miami	The more information you can give back to institutions (including institutions to which their students transfer and institutions where they eventually enroll in graduate or other higher-level schools), the better. It's also imperative that you provide us with information about any changes you make to our cohorts based on information you get from the national database (including the student's SSN)—otherwise we'll never be able to figure out why our version of IPEDS reports differ from yours.
University of Wisconsin-Madison	How will individual institutions get access to tracking information for about their own students? What kind of access to unit record or aggregate analysis will be provided? To realize the value and power of this data set, some return of information to institutions is essential.
Wor-Wic Community College	Secondly, our college has recently enrolled in the Enrollment Search and Degree Verify services of the National Student Clearinghouse in order to receive data about where our students transfer and if they earn degrees at other institutions. With the new unit record requirement for IPEDS, we would be supplying enrollment data files to the state, NCES and the Clearinghouse. Since NCES will not be providing transfer data back to the institutions, participation in the Clearinghouse would have to continue in order for us to receive this data. If NCES could provide data similar to what the Clearinghouse provides, we could eliminate sending additional data files to the Clearinghouse.
Technical challenges	
Alabama Department of Postsecondary Education	Institutions will be saddled with having to change administrative software systems. Vendors of administrative software systems will have to rewrite code and revise systems. The costs of these changes will be passed on the buyers, i.e., colleges and universities.
Alverno College	Our administrative software is DATATEL. It would be the company's responsibility to program such that any new recording/file transfer could be accomplished. Most likely some of those charges would be past on to the colleges. It will also take local programmers and users time to document, test, retest etc. any new programs.
American Association of Collegiate Registrars and Admissions Officers	Many additional variables will be needed, such as citizenship, which can require multiple coding of jurisdiction and status such as refugee or provisional enrollee. "By the time it is done, it will be a longer list." . . . with the advent of web functionality, there has been a functional merger between financial aid, admissions, and registrar systems that makes the integration of these data much more possible than previously thought. While they may not be fully integrated, they are enough of a "one stop shop" that they let students register online, with all of the financial consequences which this entails.

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Bates College	<p>The technical obstacles to the proposed unit record reporting system are significant, and would require devoting excessive staff time and other institutional resources to the problem. Many smaller institutions would find the technical challenges to be particularly difficult to meet. We think that our institution is in a far better position from the technical standpoint than most small colleges, but having collectively over two decades of experience with how small colleges work, and how rapidly changes can occur, we have very serious doubts that we could both successfully and accurately implement such a change in the timeframe envisioned by IPEDS. Of course, the mandated fines would compel institutions to address the issue, albeit to the detriment of other programs and research of more immediate concern to the students of our institutions . . . One argument has been that most of the development costs would only be a one-time burden. This is not necessarily the case. Error-checking and data edits will be a recurring problem, even after the programming to prepare a draft report is done. The problem is amplified because resolving problems to ensure consistent reporting may now involve multiple offices. Many institutional research offices only have “read” access to data, and getting errors and edits resolved usually involves contacting one or more other offices who “own” the data and who have access rights and the authority to change it. Dealing with even one or two “exceptions” is a very time-consuming process, and it usually requires low-tech approaches—phone tag, e-mail, paper files, etc. With inflexible IPEDS deadlines, it is most difficult to get rapid turn-around to resolve these problems—often we cannot get through to the only person who can resolve the problem (sick/vacation, other deadlines, gaining approvals, etc.) in a timely fashion. We are inevitably stymied when dealing with certain individuals who won’t answer e-mail, voice mail, meet deadlines, etc. At these times, our technical skills must take a back seat to our skills at negotiation, diplomacy, and creative nagging. Occasionally, we must enlist a little “coercive support” from senior administrators, but in general, we have neither the authority nor the capacity to be “data police” across the units of the College. In a small institution, there may be little opportunity for cross-training or staffing redundancy, so if the authorized person cannot respond, we are at a loss. Because of these factors, we frequently end up in a situation where we can only obtain data from others at the very last minute, and this does not give us sufficient time to vet the report with others and to take other measures to ensure the accuracy of what we have to submit. We are committed to providing most accurate data possible, but if faced with an impending fine, we are forced to submit the best we can get by the deadline. We suspect that this will lead to an ongoing cycle where we’ll receive the IPEDS “published” data, review it, and recognize that we’ll have to revise it . . . We will still need to “pre-process” any unit record submissions to verify accuracy and consistency with institutional trends at the summary level prior to locking it. We will need to store an accurate copy of the institutional data in our archives, since others will only have access to IPEDS’ “perturbed” version that appears in the Peer Analysis System. We already have to spend more time than we can afford explaining and defending discrepancies between the accurate and the “perturbed” data, and we suspect that these problems will only increase. For example, it took us over a week to evaluate, recalculate, and explain some of the blatantly “off-target” derived calculations in the recently distributed NPEC IPEDS “Data Feedback report.” (IPEDS “one-size-fits-all” approach led to some very inaccurate representations of many small liberal arts institutions.) This experience gives us much less confidence in IPEDS’ ability to accurately process the unit record data it hopes to collect. Of course, as certain definitions or derived calculations change to enforce consistency and matching across components, many of our trend analyses will “break” and have to be either re-done or heavily annotated. Our own experience with several past changes in definitions is that we are required by our superiors to maintain data elements in both the old way (for internal analyses) and in the new way. And that leads to more confusion and less confidence in all of the data.</p>
Cardinal Stritch University	<p>How will an institution be able to counter what they believe to be mis-reporting by the government? For instance, if we submit enrollment fields, i.e., credits and hours attending, the government will calculate full and part-time rates. At our institution, we calculate graduate level full- and part-time status based upon whether the student is a part of a cohort. In other words, a student who is enrolled for less than seven graduate credit hours is still considered a full-time student if they are part of a cohort program. The government would not likely note such exceptions. How is the prospective parent or student truly going to be able to accurately interpret the government’s reported aggregate values? The government would only be able to calculate indices with all schools the same. Currently schools submit not only tuition and fees data, but also book costs, as well as room and board costs. By only submitting tuition and fees and total price of attendance, it could be misperceived by the potential parent or student that an institution is inaccurately priced as exorbitantly high.</p>
College of Southern Maryland	<p>There seems to be no method identified to transmit these files. It may seem a small point, but wanting to upload the files electronically and bypassing an FTP system seems ill-conceived. Whether or not institutions have the electronic capacity to handle these large files is an issue. Large file transfers consume large amounts of resources.</p>

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Community College of Baltimore County	The Community College of Baltimore County is an institution that understands the importance of research and that the availability of data can aid in improving current practices. CCBC takes great pride in providing accurate and quality data. The submission of unit record data will require reporting at its highest level of integrity in order to provide information that can play such a vital role in the lives of our students. Suitable time and resources will be necessary to ensure quality reporting.
Eastern Wyoming College	I do not have information on how our Datatel Colleague system could/would handle the data retrieval requirements.
Financial aid administrator: large, public university in the Southwest	Our institution runs SIS-PLUS on a mainframe. Running this kind of data on our students would require significant programming time. It would not require (I don't think) an additional staff person. Of course our hope (as many others I suspect) would be that if this is a required and standardized report the mainframe providers (SCT, People Soft, etc) would permanently write the program to run as part of a standard maintenance cycle.
Financial aid administrator: large, four-year, public university in the Northeast	Two years ago, motivated by the prospect of a significant tuition increase and some nominal support from our IR area, I launched a serious effort to collect limited unit record data on financial aid recipients. Each of the issues you mentioned came up in one form or another during the discussions with data providers. We struggled, and never really resolved, issues of summer school aid (we have both "leader" and "trailer" campuses) and whether to report offered aid, accepted aid or disbursed aid.
Financial aid administrator: large, public, four-year university in the Midwest	Tagging onto the size issue, we've also seen a series of problems sending and receiving large files in our work on COD. The solution has often been to break our large files into a series of smaller ones, again causing more work and introducing the opportunity for error. Sending duplicate files is just one issue we've already seen. This is likely exacerbated by what I expect will be even larger file sizes for unit records than for COD records.
Financial aid administrator: medical school in the Southeast	Medical schools already submit the following data in the Student Record System to the American Association of Medical Colleges (AAMC).
Financial aid administrator: mid-size, private college in the Southeast	Our data base system (Banner) contains all the proposed data elements, so I don't see that as an issue. My opposition is more philosophical than procedural.
Financial aid administrator: optometry school in the West	We are a small college with limited electronic support. We would probably have to do this manually if required.
Financial aid administrator: proprietary school in the Midwest	My concern is that some of the elements we do not collect and how would that be interpreted by the NCES and others.
Financial aid administrator: Small, private college in the Midwest	Given that caveat, of the data items you have listed, our system does currently contain all except possibly the six-digit CIP code for a program of study. It may be that the registrar does have such numbers for IPEDS etc and I am just not aware of it. If such a number sequence is not in place, it would obviously take some time to set up but would probably be not be overly time consuming or expensive.
Financial aid administrator: small, private, liberal arts college in the Northeast	The registration information they are looking for is easy enough to pull from the as/400. From everything I've read about this, the issues/concerns regarding the proposal are not based upon how hard it is to pull the data or the workload required, but rather the ethics of how the list will ultimately be used and/or shared. It is interesting that none of the questions asked were regarding that area, just how easy it would be to do.
Houston Community College System	I believe that the recent acquisition of PeopleSoft by Oracle could also have an affect on this proposed project. Oracle has verbally committed to continuing to support the PeopleSoft product for the next 10 years, but this is a gratuitous promise and cannot be regarded as a certainty. Conversion to another system for college administration would further increase expenses in times when resources are scarce.
Johns Hopkins University	Johns Hopkins does not have a university registrar. Some academic divisions, e.g. School of Medicine, maintain their own student record systems. The university is in the midst of implementing a new student information system. The Matrix system from SUNGARD SCT was selected in part because it provided the flexibility to manage student information eight different ways, according to the needs of each of the divisions. The university will need to retrieve data from satellite systems, the legacy system, and the new student information system.
Lexington College	We have a computer-based system of student unit records, but would have to create a different type of unit record system for NCES submissions. This is a big issue for us. We are a small, private institution, and changing our technology is not in the current budget. Would we receive funding to undertake this task?
Marian College	At a minimum, this would require a comprehensive systems analysis to determine data sources and timing, and careful file creation would require several weeks. Given the currently fragmented systems that would have to be accessed, it is doubtful that these processes could be even mostly automated in the foreseeable future.
Maryland Higher Education Commission	Lastly the use of a very new technology for data transfer (XML) was being pushed without regards to clear benefits to either side. In the meeting IPEDS did suggest they would support current ASCII text file transport as a option. This would eliminate state and institution costs to implement this technology.

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Mount Mary College	Over the past ten years we have diversified our programs in an effort to maintain a reasonable enrollment level; tracking these students in the way proposed would conflict with the ways we track them for our own purposes. We would not be in a position to provide these data electronically without maintaining a separate data set for our own tracking. Our experience is that the way we need to count our students, because it is atypical, never matches what we are asked to send to IPEDS. We meet the current expectations by extracting data and manually reconfiguring it into the way in which IPEDS asks for it In addition, we already have an outdated system that does not provide a shared data base and we do not have the funds to upgrade our system. We certainly don't have the funds to comply with the proposed requirements either instead of or in addition to what we need to do for our own purposes. At present we are challenged to maintain the data that we need to operate our institution and provide the data required by IPEDS. There is no way we could meet these new expectations without major changes in our work and a significantly higher level of staffing.
National Student Clearinghouse	It will be a challenge for schools to scrape it up and put it together, since most of the data come from multiple systems and it will be difficult to integrate the data in the same time period depending upon when the reports are cut. The Clearinghouse collects way less than this.
Occidental College	While it is certainly true that finding out what happens to “transfer-outs” and tracking students who attend multiple institutions are important goals, requiring every single college in the country to report on every single student is a grossly disproportionate response. Virtually every social science research or policy question is answered not by bludgeoning the country with a nationwide data collection scheme, but instead by sampling. For several million dollars, a longitudinal sample of several tens of thousands of subject could be created to answer these same questions. That would be far less costly and intrusive than the proposed national unit record scheme.
Purdue University	There was some discussion about the current difficulty for larger institutions of reporting financial aid data in the XML format. Will there be supporting software, training and/or assistance for convert to the XML format?
Rensselaer Polytechnic Institute	Pulling the data in the format requested will take a complete re-examination of the computer system that Rensselaer uses for student records management. Pulling the data in the specified format may require significant modifications to fields, metadata, and reports.
St. John's College	Smaller institutions struggle with the implementation of new data transmission systems. On our campus, for example, there are several computer systems in use. Coordinating these systems for a reporting requirement of this magnitude would involve not only a great deal of staff time but great expense. The IT staffing just isn't adequate considering the demands on their staff from all college offices At St. John's College, they have five computer systems and don't have UR for a number of reasons—technology, managerial, privacy, and registrar protections. Lots of people would like a wall of data from admissions to registration and on through to alumni and advancement. St. John's is playing out in miniature what is happening on a national scale.
St. Lawrence University	We are worried about declining data accuracy if we moved to the proposed UR reporting. For each IPEDS reporting cycle, the institution employs a thorough data cleansing process. Data entry or extraction errors might be discovered by running special queries and looking at aggregated data. Since UR reporting will rely on the submission of transactional data and follow a coding scheme that does not fit our institutional system, these quality checks will no longer be able to be employed While we have a well-functioning, and well integrated homegrown information system, it would need to undergo substantial expansions and modification to accommodate the proposed UR reporting. Most significantly, we would need to develop a comprehensive audit system to flag record changes, requiring the acquisition of a separate server. Another start-up obligation would be the creation of hundreds of crosswalks from our internal coding scheme to the numeric format used in IPEDS UR reporting. None of these activities would directly benefit the institution!
Towson University	The data we report both internally and to external constituencies may not match the data ultimately reported by NCES because of different reporting methodologies. In order to ensure that NCES and the institutions are reporting comparable data; it will be imperative that standardized methods of analysis be developed and shared.
University of California at Berkeley	It will be difficult to include extension, summer, and assistantships at national labs that are not part of existing admin systems
University of Colorado at Boulder	Upload options need to include flat/ASCII files as well as more exotic formats.

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
University of Maryland	The feasibility of implementation depends on the cost, timeframe, and planning. While we go to great lengths and costs to assure quality of the census data that are currently collected and reported, to expand that process would require major changes in the campus infrastructure. Our transaction systems are designed to maintain daily operations for the institution. These systems do not keep longitudinal data or up-to-date information outside of the needs of the service offices. Our census system maintains historical, accurate, reliable information that is auditable and verifiable. While we still have data quality issues, we do our best to maintain documentation to explain changes in trends that are due to definitional issues. To blend these two systems together and maintain accurate and reliable data on a regular basis would require an integrated infrastructure that would take away a great deal of resources from the primary mission of our institution: to teach students. Data used outside of our census reports would not be deemed reliable by our staff and should not be used to characterize our institution. Given that the intention of the proposed data collection is to improve the quality of the data provided to NCES, this is a critical obstacle in the way of the success of this project.
University of Maryland, Baltimore County	For UMBC, this proposal comes at a particularly difficult time, as we are beginning a three-year effort to implement a new student information system (PeopleSoft). For us, this would mean developing the new reporting requirements twice: once for our legacy system and again when the PeopleSoft system is implemented. While we will not know the true impact (cost and effort) until the final technical specs are developed, we know they will be significant . . . As we interpret the data elements being required in this new UR system, there seem to be items that we now do not report (total price paid per student; total price charged per student; family flag; dependent status). This will require new programming logic and testing.
University of Maryland Eastern Shore	We shall need the services of a PeopleSoft consultant to determine our needs and help us write appropriate programs.
University of Oklahoma	While any systems change will create some real burdens, often ERP package systems may take years to catch up, especially if the process is not built into the software package. Changes to these vendors' administrative information systems can be massive projects... XML is a much wordier way to store data and some submissions of XML data in California have had to break the file into pieces.
University of Wisconsin - Madison	Large institutions like UW-Madison often rely on commercial enterprise data systems. It may take years for vendors to provide patches and changes that support UR IPEDS, particularly since the software packages were not designed with UR IPEDS reporting in mind. And the application of those patches and upgrades can become major projects consuming precious technical and budgetary resources. Support from vendors is unlikely to be available during the pilot phase. Oracle's recent acquisition of PeopleSoft may complicate and delay any vendor-based support for UR IPEDS reporting.
University System of Maryland	Given the amount of data to be collected, the level of poor quality data which enter the system will be enormous. This will, for years to come, effectively frustrate any attempt to draw meaningful conclusions from the data which are not as likely artifacts of the data quality. Problems with tracking, changes in names, confusion about cost, nature of courses and credit hours, degree plan designations, and the "backfilling" of data cannot be resolved, in advance, to a degree which will address this problem. It will be several years of collection before this system could possibly hope to produce an information "signal" discernable through the data error "noise." . . . In-house programming, and in some cases considerable work with consultants, will be required to enable current student information systems to produce the data for these reports. Beyond the direct costs created by these changes, opportunity costs will be incurred as implementation schedules are altered and pushed back to make this federal reporting a priority. Some institutions could lose as much as a year in their efforts to bring new PeopleSoft modules online.
Viterbo University	One of our biggest objections is the cost of converting to another system—personnel, time, and money. (I wonder if some company has been lobbying the government for this so they can "force" each institution to purchase their administrative system.)
Terms	
Career Colleges Association	Whatever is implemented needs to be fair and equitable in recording the instructional activity of all types of institutions and term structures, including summer.
Goucher College	[I am] jolted by the prospect of keeping up with all these status changes over multiple files over a term.
Johns Hopkins University	It will be a considerable challenge both within and across universities to coordinate academic calendars and determine the timing of federal submissions. The academic divisions at Hopkins operate on both semesters and quarters. Part-time programs offer courses that overlap terms.
National Center for Higher Education Management Systems	The issue of term structures and the nature of enrollment suggest the need for "radical ways of thinking about enrollment," where higher education may look more like episodes in healthcare.

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
Pima Community College	How often should the file be created and transmitted? It must be at least twice a term—we have multiple terms. Our terms include fall, spring, summer (can be looked at in two fashions, since Summer Session C crosses over the fiscal year—July 1 is the start of the new fiscal year), a term for CTD, terms for Gila County enrollment which is reported on IPEDS by Pima Community College, and a term for students who are in a full-academic year term. 5. How should credit hours be reported—as attempted or as earned? If we send a UR file for our census date (45th day for Community Colleges in Arizona), then most credits would be attempted. The end of semester file could reflect both attempted and completed. If this reporting is going to be used for financial aid tracking, enough data must be submitted to show satisfactory academic progress. It is the frequency of creating the UR that is a major concern. We need to definitely send in a fall enrollment UR to establish a cohort for later reporting. For data to be comparable to past reports, we would need to sent in a census day file and at least an end of the year file to capture completions and enrollment that is not picked up on the first census day.
St. Lawrence University	Data integration would be most problematic where net tuition would be linked to enrollment activity, for the following reasons: 1) Our academic calendar year operates from fall to summer (end of August through beginning of August the following year), while our fiscal year cycle is July1 through June30. In aggregate reporting, it is easy to accommodate these adjustments; however, for unit record reporting, the two cycles would pose a significant problem; and 2) loan charges arrive throughout the year and are not specifically tied to a given semester, making it difficult to report charges beyond an entire academic year.
Thomas Jefferson University	Issues were raised about the official semester/term of record for medical students at freestanding medical schools such as Thomas Jefferson. Differentiated stop and start dates will be needed by student level and some kind of coding structure will need to be in place for these records and documented in the Institutional Characteristics (IC) file.
University of New Mexico	Reporting for multiple terms each year is also a major additional reporting burden. We'd still have to send reports to our state (since NCES can't release any data back out) and our state needs and state definitions are likely to be different than what would work for this proposed IPEDS collection. Thus we'd be doing two different files, would have to reconcile between them, etc. And the IPEDS burden would be year long, and not just a once-a-year report.
Washington University	I think the notion of unit record reporting does have merit in terms of the enhancement it could bring to concurrent enrollment, transfer activity, graduation rate, and time-to-degree issues on a national scale. These all address the Congressional issue of accountability by having a comprehensive set of data from which to report. The submission of census files several times during the academic year would not in my opinion present an excessive burden on schools, particularly when considering the trade-off in not having to do IPEDS Enrollment, Completions, and Graduation Rates anymore.
Timing	
Association of American Universities Data Exchange Brewton-Parker College	Another concern was the reconciliation of unit record data against summary figures provided by NCES (how long will it take to do this within the current locking process). After going over the collection processes necessary for the unit record collection system, the administrators from Brewton-Parker College propose that a the deadline for the fall enrollment, enrollment transaction update files, and student finance files not be prior to December 1. The team members all felt that the information related to the required variables could be gathered and input into the database by that time, making a reporting period deadline of early December a goal that could be achievable.
DePaul University	Further the timing will cause some of the variables to differ. For example citizenship for an international student may be one characteristic in the fall for Entering Fall enrollment and another characteristic by the time they complete their program for the Completions report. Of course the same is true for degree plan, program length, and many other variables. If this goes forward serious consideration should be given to putting information about the degree program into the term component of the record which I assume is reoccurring.
Financial aid administrator: large, four-year, private, not-for-profit, university in the Mid-Atlantic region	The admissions and financial aid cycles are anything but coterminous and in fact tend to be about a year apart with financial aid behind. This means, for example, when we generate data for the Common Data Set, we have to decide whether to submit data that is accurate from the most recently closed Award year, but a year behind the equally accurate admissions data, or develop an estimate of the current award year's likely result, that will not be completely accurate but will be consistent with the admissions submission. Since it seems ineffective, and perhaps unfair, to give prospective students inconsistent data and expect them to make the mental adjustment, we wind up doing the estimate. We have become relatively good at it and I am confident that we can make adequate estimates of current year aggregate data. However, I can think of no way to generate "estimated" unit record data. This means that the only way to have consistent and accurate data would be to lag the admissions data by a year, something I suspect the Congress will see as not responding in timely fashion.

See notes at end of table.

Appendix B — Estimates of Burden

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
George Mason University, Randolph Macon Woman’s College, St. Olaf College	Developing transactional databases with records from over 6,700 institutions would create a verification quagmire, threatening huge delays in presenting meaningful, useful information such as NCES has begun to achieve in recent years.
James Madison University	The IPEDS UR system will degrade the credibility of institutional research across the country if it delays institutional ability to respond to data requests. IR is already expected to respond to a host of questions from both external and internal sources before data is official. This problem is most acute for fall enrollment reports, including data about first-time entering freshmen. Edits that might require an institution to change its FTF cohort have to be available so early that an institution can complete its fall enrollment no later than October 15th of each year. Also, IR shops cannot afford degradation to their credibility associated with changing official numbers or having more than one official number on the same subject . . . Again, timing is an issue with respect to existing state UR systems. To which system should an institution first submit its data? Will state systems still be open for edits after federal mandates force changes to the data? Financial data is very organic and synchronization of state and federal systems will help reduce the potential for generating different information on the same subjects.
Mills College	The current time-lag between data reporting and availability limits the usefulness of the IPEDS aggregates. I believe that NCES has underestimated the potential costs to colleges and universities while presenting an overly optimistic picture regarding the period of disruption in federal-level aggregates. Requiring more time and resources on my part to comply with NCES requirements while providing less timely access to peer data is simply an absurd proposition.
New York Institute of Technology	I believe that the file submission should occur after the traditional Fall semester has ended; in our case that means after the end of December (our Fall term ends roughly at the end of December). I don’t believe that the current IPEDS requirement of freezing data files in October has kept pace with the times. There are several reasons why fall enrollment may not be nearly complete by October; some of the big ones I can see are: (1) out of country enrollments where the fall term may not precisely coincide with the fall term here in the United States; (2) online colleges cropping up as part of traditional universities, which may have rolling admissions where the fall term is a moving target and students are continuously enrolling; and (3) Registrations from “offsite” locations that come in late for a variety of reasons. I think many colleges and universities are still attempting to fit their offerings into a fairly traditional fall term but I think the edges of the fall term are being pushed, with enrollments happening all through the entire term. For these reasons I think that if there is to be just one upload of record that it ought to occur sometime after December for the preceding fall term. However, I think a better solution is to have an upload at the end of December with new registration updates to fall enrollment for up to six months after the term has ended.

See notes at end of table.

Table B1. Selected comments received from institutions regarding burden associated with implementing unit records system, by selected topic—Continued

	Comment
University of Miami	<p>Creating a separate census file would probably produce less burden for us than trying to track/date census versions of these fields on an end-of-semester file (I'd suggest you allow institutions an option for how to report Enrollment (EF) data: those institutions for whom a snapshot is appropriate because they have a small number of terms could opt to send a census file, whereas other institutions for whom cumulative enrollments are more appropriate because they have rolling class begin-dates could use the end-of-term transaction file). With that exception, the fewer the number of files the better. . . . Transaction files: One problem with end-of-fall-term files is that many people take vacation at the end of December and early January, so having a due date as late as possible would be helpful. A single summer file, with two records for students enrolled both terms would be easiest for us (for one thing, we have classes that run across both summer sessions). August is a big vacation month so it would be better to have this due in September. It will really help with burden if transaction files can be snapshots that do not require tracking changes in status (e.g., for intensity, majors, etc.) since dates when many of these fields change (including intensity prior to our census date) are not stored on our homegrown computer system. . . . Completions: Degrees awarded over the summer are supposed to be posted by early- to mid-October, but our Registrar said the later this file could be sent, the better. In fact because of incompletes and issues related to international students, a number of degrees are retroactively posted during the year after the official degree date (I'd estimate our 4-year graduation rate increases around one full point when it's recalculated a year later, due to retroactive degrees). If you want accurate data you will need to ask institutions to provide an addendum to the prior-year Completions report each year to reflect these retroactive degrees, but this will of course increase burden (we don't record the date when degrees are recorded so it would require re-running the prior-year completions report and merging with the original report to identify discrepancies). . . . Financial aid: UM's financial aid year tracks our academic year (i.e., fall/spring/summer A/summer B). The SFA data should not be requested until well after the end of the aid year to be sure that effect of spring transfers, fall graduates, late applicants, and students who complete the verification process late are accurately reflected. Our Director of Financial Assistance Services (FAS) indicated the first two weeks of October were the lightest for his office, but our office would probably produce the file and those weeks are our busiest since that's when UM benchmarks its census file. November would be a better month for us.</p>
University of Wisconsin - Madison	<p>In order for UR IPEDS to satisfy the student loan reporting requirements there would need to be timely submissions at critical points in each semester such as: first of term, last drop date, end of term, and perhaps additional points. For example, UW-Madison submits six enrollment files per spring and fall semester and 5 files during summer to the National Student Clearinghouse in order to comply with student loan enrollment reporting. We have access to this system and there are clear benefits to the university and our students and alumni, so we can identify clear benefits to from our investment in this system.</p>
Viterbo University	<p>I think it would not cut down of the amount of time we currently put into IPEDS. We would need to reconfigure our data input/output and our methods of gathering information from students and personnel.</p>

SOURCE: Comments were taken from Technical Review Panel discussions or letters and e-mails sent directly to HigherEd.org for the feasibility study. In some cases, the language has been modified to meet NCES publication standards.

Cost Estimates

Comments about cost estimates fell into three general types: (1) data-driven—i.e., those examining a variety of factors in calculating costs; (2) basic—i.e., those that looked at only one or two factors, such as personnel time; and (3) opinion—i.e., those that did not appear to be supported with data but only with anecdotal claims or opinions.

Data-Driven Cost Estimates

Four cost estimates examined a variety of factors and were somewhat data driven, including Indiana University (eight campuses), the University of Texas (UT) (nine academic campuses, six health science centers), the University of Maryland Eastern Shore (UMES), and Towson University. Of the two system offices, the total Indiana estimate is \$143,400 for implementation and \$54,000 annually; where the UT total estimate is \$2,275,000 for implementation and \$1,268,000 annually. Towson University estimates \$210,500 for implementation and \$162,000 annually, and UMES would require \$378,000 to implement, but did not include an operational estimate.

The Indiana methodology is “based upon the time it will take to create data extractions for a single campus and then modifications of those queries to accommodate the other campuses,” including “an estimate to cover hardware to store the data submissions.” The UT methodology “did not include any indirect overhead costs, but did include estimates for person hours required to reprogram and build new files and for transmission processes, as well as an estimate for the data verification process. In a couple of instances, the cost of additional hardware was included to archive submitted datasets. Some software costs were also included, however, the bulk of these costs are for personnel.”

The UT estimates are at a more gross level of personnel costs, but average \$151,667 per school for implementation. The Indiana estimates are more refined, with personnel hourly estimates for each type of data file, but are less by half for the system as a whole than are calculated for UT. This discrepancy illustrates the different perceptions of the personnel costs and the inclusion of software upgrades for administrative information system improvements. These are more likely a function of these two systems preparedness for extracting and manipulating large scale datasets, with Indiana doing this centrally and UT passing the work and costs onto the campuses.

Towson includes the full \$2,000 cost of a computer for each of four full- or part-time additional staff; while UMES would need to purchase nine \$2,000 computers for staff and a special \$10,000 server. UMES also built in \$150,000 to retain a PeopleSoft consultant for six months. The President of Towson University reiterates that “this initiative will impose a heavy financial and resource burden on our institution.” The “anticipated increased IT workload related to the proposal is by no means trivial as indicated by the resource estimates.” The UMES estimate, the highest for any one institution that was received as part of the project feedback, includes effort by at least eight staff in addition to the PeopleSoft consultant.

Basic Cost Estimates

A wide range of responses were received from schools whose cost estimates were less refined. There is little similarity between them. However, at least seven respondents suggest that the unit record proposal would require approximately one more full-time equivalent (FTE) staff member per year. This is based on their careful reading of the proposal and TRP summaries, which contain much more explanation of the specifics of how the system would work. James Madison University’s (JMU) institutional research office states that after needing one more staff FTE the first year, the cost burden would decrease to one-half FTE annually. The cost of this one FTE ranges in estimates from \$60,000 to \$100,000 per year and would vary based on regional cost of living differentials, among other factors.

The discrepancy in estimates at even this most basic level is shown in these typical responses. The University of Colorado at Boulder suggested that the initial implementation of unit records would require 100 to 200 hours of the director’s time and 200 to 400 hours of staff time for startup. However, maintenance would not be any more than it is now. A joint letter from George Mason University and Randolph Macon Woman’s College that was disseminated widely to the institutional research community, and that was mentioned in other letters and comments, assumed that it would require “one FTE per institution at a nominal average salary of \$60,000.” Mount Mary College’s estimate, which was not broken out, totals \$750,000 for implementation because it has “an outdated system that does not provide a shared data base and we do not have the funds to upgrade our system.” The University System of Maryland estimates that it would take four to six additional FTE at a cost of \$400,000 for implementation and \$225,000 for subsequent years. The comparability of these

estimates is questionable, especially as most of these institutions participate in an existing state/system unit record system collection of student data.

Some schools such as Pima Community College and Shorter College state that they can already do this kind of unit record reporting without additional effort, as do some of the financial aid administrators surveyed by the National Association of Student Financial Aid Administrators (NASFAA). NASFAA comments included statements that: “It is not a large task to get the information requested...It will take staff time but it should be minimal.” “It wouldn't require additional staff.” “This kind of report would be a low-impact project from the cost perspective. It would be simply staff time to develop a script to extract this information from our system.” Another financial aid administrator explained that, “Our data base system (Banner) contains all the proposed data elements, so I don't see that as an issue.”

Opinion Estimates

Most of the estimates that were received were based upon anecdotal evidence and opinion and did not appear to be data driven. They focus on how the implementation of unit records would take staff time away from other projects, would require a major overhaul or upgrade of administrative information systems, or would simply “take months to implement.” Very often, these estimates are lumped in with other required changes coming from outside of NCES, specifically the use of new race/ethnicity categories and the need to submit data in XML format. OMB is requiring the new race/ethnicity categories for all unit record data collections and FSA is requiring the submission of unit record data using XML.

Some schools report that their costs would be intertwined with the role of their state system or SHEEO offices. If two different unit record systems must be maintained, one for NCES and one for the state, then there would be an obvious perceived duplication of effort and increased burden. If the SHEEO or system could be modified to include the additional data elements needed for IPEDS, as some states do now, then there would be no increased burden with unit records, according to some institutions.

Conclusions

Much of the data in providing estimates of costs for implementing unit records comes down to two factors—additional personnel and additional hardware/software. For schools

that are already well staffed, if priorities are not shifted, then additional work would require additional staff. However, this is estimated in the range of one-half to one FTE per school, at a cost of \$60,000 to \$100,000. This would vary with the role of central offices, such as in the different estimates of Indiana University and the University of Texas systems and the campus estimates of Towson University and the University of Maryland Eastern Shore.

In preparing any cost estimate, two fundamental challenges will always remain: (1) the lack of good staff workload data; and (2) differences in administrative system capability. The Indiana University model is based on estimated hours for each of the different unit record files. These estimates are likely based on good internal tracking of projects and time sheet tracking. Few institutional research offices can afford this level of project management documentation, operating instead in a just-in-time production mindset. There are no easy comparisons of system capabilities either. For some schools, unit records would require a vendor contract in which the school pays someone else to extract and prepare the data for NCES, and the bid for this would include profit margins. At many other institutions, system offices already do this work and submitting student unit record extracts should involve minimal extra effort. Still at others, such as small career colleges, there would be a need to document print records in NCES-provided spreadsheets, which are needed already for adequate IPEDS reporting.

Most institutions do not include the full, direct costs for new computers as part of their projected costs for implementing UR and this seems appropriate. The cost of additional servers and extensive, long-term consulting relationships with vendors for administrative software systems also should not be attributed as a full, direct cost of UR, since they would benefit and impact other functions at the institution.

The actual increase in burden with the implementation of unit records would be the time necessary for resolving mismatches, which are estimated to be between 4 and 6 percent of all records based on NCES experience with NPSAS. Mismatches would be resolved by the school's keyholder working with the IPEDS Help Desk. Special algorithms and "fuzzy logic" would be used to suggest possible matches and how best to resolve discrepancies between records, so that time spent on reconciling mismatches would be minimized.

Some schools included in their burden estimates the time they would spend merging records and creating draft summary reports locally. This is certainly a choice; however, this burden of verifying the outcome and matching records locally would not be designed as part of the unit record system and would not be a requirement. The matching and editing

processes built into the system would be sufficient to accurately merge records and resolve mismatches.

Without very complex and data-driven estimates, the range of perceived burden in terms of cost is very wide. There is some agreement, among a certain type of school, that it would require an additional FTE for the first year and probably somewhat less staffing annually after implementation. There would need to be a complex survey conducted of staff workload to determine true staffing hours. This has been shown to have limited utility unless extensive daily logs are in place and the results are tied to some kind of reward system. A co-chair of the third Technical Review Panel meeting (at which the issue of cost estimates was discussed at length), Stan Ikenberry, replied that “these dollar estimates may not tell us much, in part because they would vary widely and aren’t really informative.”

The varieties and differences between administrative information systems are difficult to track. However, where extracting is already done by vendors or internally by the institution, the cutting of a dataset is not the question, so much as the process of handling mismatches. It appears that those schools that are most prepared to deal with the mismatches place a higher priority on data integrity and are willing to devote the staff time to resolve them; whereas other institutions might be more willing to let NCES assist them, using “fuzzy logic” and other techniques to tie streams of data together in order to resolve mismatches.

Overall, perceived cost estimates appear to vary depending upon whether the institution desires to replicate and duplicate the NCES procedures locally. While NCES has stated that it would give out the SQL code for institutions that desired to calculate aggregate reports locally, this is not part of the intended function of the UR system according to the proposal and should therefore be separated from its cost estimates. The creation of aggregate reports prior to submitting UR data should be considered a quality check on the art of the institution, but it is not a required activity in the process as anticipated by NCES.