

Maryland Higher Education Commission

2010 (and 2009) Reporting Revisions Statewide Workgroup

Final Recommendations for:

- Implementing the new 1997 race/ethnicity standards 2010
- MHEC revision for transfer-in reporting 2009
- First-professional (and fp certificate) degree levels elimination 2009
- Recent high school graduates by residency 2009
- Collection of student identification numbers

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Overview
 2010 Reporting Revisions Recommendations

This document addresses several issues and reporting changes for the 2009, 2010 and 2011 collections. The initial data collection year affected by the recommendations is summarized in the table below as well as discussed in more detail in the section discussing the reporting area. These include:

- 2010 and 2011 New U.S. DOE race/ethnicity standards
- 2009 New IPEDS transfer-in reporting requirement and MHEC collection
- 2009 Prior Year High School Graduation
- 2009 IPEDS elimination of the first-professional and first-professional certificate
- Student identification in Maryland higher education for longitudinal tracking of students in a P-20 continuum

Assessment of 2010 (and 2009) revisions on MHEC Annual Collection Systems
 This table shows the System or form used in collection and indicates what surveys are impacted and the collection year of impact.

System or Form	Segment	New Race/Ethnicity	Transfer-in identification	High school graduation year	First-professional changes	Multiple student ids
Enrollment Information System (EIS)	Public 2yr Public 4yr Independents	Yes 2010	Yes 2009	Yes 2009	Yes 2009	n/a
Degree Information System (DIS)	Public 2yr Public 4yr Independents	Yes 2011	No	No	Yes 2009	n/a

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High School Graduate System (HGS) or form S-14	Public 2yr Public 4yr Independents	Yes 2011	No	No	No	n/a
Financial Aid Information System (FAIS)	Public 2yr Public 4yr Independents	Yes 2011	No	No	No	n/a
Employee Data System (EDS)	Public 2yr Public 4yr	Yes 2010	No	No	No	n/a
WIA Program Performance File	Public 2yr Public 4yr Independents	No	No	No	No	n/a
Enrollment reporting forms (S-1, S-4, S-8, S-9)	Independents	Yes All aggregate 2010	Yes S-1 2009	No	Yes All aggregate 2009	n/a
Opening Fall Enrollment (S-7)	Public 2yr Public 4yr Independents	No	No	No	Yes	n/a
Degree and Formal Awards Form (D)	Independents	Yes Aggregate 2011	No	No	Yes 2009	n/a
Application Acceptance and Admission Form (S-3)	Public 2yr Public 4yr	Yes 2010	No	No	No	n/a
Financial Aid (S-5)	Independents	Yes Aggregate 2011	No	No	No	n/a
Distance Education (DE)	Public 2yr Public 4yr Independents	No	No	No	Yes 2011	n/a
Transfer Student System (TSS)	Public 4yr	Yes 2011 see section 1.6	No	No	No	n/a

Section 1

Recommendations for Implementing 1997 Race/Ethnicity Standards in Maryland

1.1 Background

With an announcement in the fall of 2007, the new State and federal requirements finally have been put into place after a hiatus of 6 years. These requirements change how racial and ethnicity information is identified and collected by institutions, MHEC, and the US Department of Education. This change will have a significant impact on institutions collecting and reporting this student data. MHEC established a workgroup to provide guidance to institutions and planning on reporting changes for the period 2008-2011. The workgroup was led by Charles Benil, Information Systems Director, who is responsible for State and federal reporting of student and staff data. Before the federal government hiatus, a previous workgroup worked on this from 1998 to 2001.

A brief history of the new 1997 race/ethnicity standards starts with the 1997 OMB standards to planned 2010 mandatory reporting compliance year.

- Original 1977 standards – single category
- New 1997 standards – one/two question format, separate ethnicity, multiple races
- 1998-99 federal studies on implementing
- 2000 federal provisional guidance
- 1998-2001 MD statewide workgroup
- 2000-2001 State legislation – two question
- 2007 federal final guidance
- 2008 presentations on new race/ethnicity changes to segments and MDAir
- 2008 formation of 2010 Statewide workgroup and their recommendations
- 2010 mandatory compliance year

In the past data collection standards allowed individuals to be identified in only one racial category. The federal government has developed new ethnic and racial categories to provide a more accurate picture of the nation's diversity. The new categories enable individuals to be identified in both ethnicity and race. They also allow more than one race to be identified.

Even though institutions are required to collect race/ethnicity data individually in a new two question format, the national data to be collected by IPEDS will still be at an aggregate level. The following table provides a comparison of the 1977 aggregate standard categories to the new 2010 federal aggregate reporting categories which are based upon the race/ethnicity data collected from individuals. Changes are highlighted.

Current 1977 Reporting Categories	2010 reporting categories (1997 revision)
Non-resident Alien	Non-resident Alien
Hispanic	Hispanic (of any race)
Black, non-Hispanic	Black or African American, non-Hispanic
White, non-Hispanic	White, non-Hispanic
American Indian or Alaska Native, non-Hispanic	American Indian or Alaska Native, non-Hispanic
Asian/Pacific Islander, non-Hispanic	Asian, non-Hispanic ----- Native Hawaiian or other Pacific Islander, non-Hispanic
	Two or more races, non-Hispanic
Race and Ethnicity Unknown	Race and Ethnicity Unknown

1.2 Schedule Recommendations

The Statewide workgroup recommended that the schedule for 2010 reporting revisions be oriented around the federally mandatory academic year of AY 2010-2011. Therefore the modified surveys would be collected based upon the academic year for the data in the survey itself. This creates a separation of the surveys affected by these 2010 revisions into two collection years (CY). The two collections and how they relate to surveys are:

- CY 2010 for those surveys collecting data on current AY2010-2011 such as
 - Enrollment Information System (EIS)
 - Employee Data System (EDS)
- CY 2011 for those surveys collecting data on prior AY2010-2011 such as
 - Degree Information System (DIS)
 - High School Graduate System (HGS)
 - Financial Aid Information System (FAIS)

The other recommendation carried forward from the previous 1998 workgroup was for an 18 month lead time period prior to the AY2010-2011 to allow institutions to prepare for the mandatory requirement year.

The schedule timeline table below shows an overall time line for the 2010 reporting revisions and the relationship to the implementation year of AY 2010-2011 (shaded area).

Task	Start Date	End Date	2008		2009		2010		2011	
			Jan-Jun	Jul-Dec	Jan-Jun	Jul-Dec	Jan-Jun	Jul-Dec	Jan-Jun	Jul-Dec
Workgroup Recommendations	3/25/2008	8/30/2008	█ → →	→ █						
Institution Preparation	9/1/2008	7/1/2009		█ →	→ → → █					
Institution Collection AY2010 Students and Staff	7/1/2009	9/1/2010				█ → → →	→ → → →	█		
Institution Resurvey Current Students and Staff	1/1/2010	9/1/2010					█ → → →	█		
Implementation AY 2010-2011										
MHEC Preparation	9/1/2008	6/1/2010		█ →	→ → → →	→ → → →	→ → → █			
MHEC/IPEDS CY2010 for current year surveys	8/1/2010	1/1/2011						█ → →	→ █	
MHEC/IPEDS CY2011 collection for prior year surveys	8/1/2011	1/1/2012								█ → →

This schedule table is to provide overall guidance to the institutions. Each institution will need to develop a more detailed and specific time line to accomplish this at their college. In this time line consideration must be given to the many deadlines an institution may have and interdependencies between them:

- Institution Preparation
 - Revisions to application forms for new students entering Fall 2010
 - Revisions to web application forms for new students entering Fall 2010
 - Revisions to employment application forms for employees starting Fall 2010 (or after resurvey)
 - Modification to student information system for storing new race/ethnicity data
 - Modification to human resources system for storing new race/ethnicity data
- Institution Resurvey
 - Resurvey of students enrolled in the Spring 2010/ Fall 2010 semester
 - Resurvey of employees who started prior to Fall 2010 (or before resurvey)
- Institution Reporting
 - Modification of both federal IPEDS and State reporting interfaces for 2010
 - Modification of both federal IPEDS and State reporting interfaces for 2011

This table shows the effect of race/ethnicity changes in the 2010 revisions on the MHEC Annual Collection.

System/Form	Segment	Revision Collection Year
Enrollment Information System (EIS)	Public 2yr Public 4yr Independents	2010
Degree Information System (DIS)	Public 2yr Public 4yr Independents	2011
High School Graduate System (HGS) or form S-14	Public 2yr Public 4yr Independents	2011
Financial Aid Information System (FAIS)	Public 2yr Public 4yr Independents	2011
Employee Data System (EDS)	Public 2yr Public 4yr	2010
Enrollment reporting forms (S-1, S-4, S-8 S-9)	Independents	2010

Degree and Formal Awards Form (D)	Independents	2011
Application Acceptance and Admission Form (S-3)	Public 2yr Public 4yr	2010
Financial Aid (S-5)	Independents	2011
Distance Education (DE)	Public 2yr Public 4yr Independents	2011
Transfer Student System (TSS)	Public 4yr	2011

The federal IPEDS survey mandatory requirements which collect race/ethnicity data are provided in following table:

IPEDS collection year	IPEDS surveys required to have new race/ethnicity standards
(2010 -2011)	Fall Enrollment (EF) Human Resources (HR)
(2011 -2012)	Completions (C) 12-Month Enrollment Graduation Rates (GRS)

The surveys that collect data on older cohorts such as MHEC's TSS or the IPEDS GRS also have a mandatory reporting in 2011. Special recommendations will be provided on how to handle this situation given the difficulties in resurveying students who may have left the institution many years prior to the data collection time.

In order to provide institutions flexibility in their individual schedules due to internal needs or resources, it is possible for institutions to move to the new race/ethnicity standards prior to AY 2010-2011. Institutions are encouraged not to do this to maintain consistency within the State. If an institutions does move at an earlier time they will be required to bridge back to the old 1977 standard for reporting until the CY 2010 period. This will have to be completed under a method acceptable under OMB guidance. State systems will not be able to accept the new Race/ethnicity standard until CY 2010. Therefore any data uploaded by the State to IPEDS prior to CY 2010 will be based upon the old standard. Institutions that do move earlier will have the option to either update the MHEC upload or request it not be performed for their institution.

1.3 Two Question Format Collection Format Recommendations

The mandatory federal implementation for institutions of higher education in 2010 of the 1997 race/ethnicity standards (referred to as the new standards) is accompanied with final guidance provided by the U.S. Department of Education. This guidance is based upon the U.S. Office of Management and Budget (OMB) issuance of the new standards. In addition, all public institutions must comply with a State law that directs collection of the new standards.

All of this guidance requires the use of a two question format but does not prescribe the required question language or presentation. The workgroup is providing recommendations to the Maryland institutions to assist them to meet both the federal and State requirements. The 1997 new race/ethnicity collection question is broken down into each component for discussion.

Initial Opening

The workgroup recommends using a standard opening statement to frame the ethnicity and race questions. The recommended wording is:

Colleges and universities are asked by many, including federal and State governments and national surveys to describe the racial and ethnic backgrounds of our students and employees. You should answer both questions.

Optional additions can be added depending on respondent group or method and timing of form. For example on an employment application form: This information does not affect your consideration for employment or this information is not used to determine eligibility for admission.

Hispanic/Latino question

The workgroup recommends using a standard ethnicity question. The recommended wording is:

Are you of Hispanic or Latino origin? Yes No

Definitions must be displayed and available to respondent after questions or in separate section or in pop-ups/links for web applications. Institutions can choose to add definitions to question.

Subcategories can be used as long as it is clear the subcategory is part the primary question and when selected are answering Yes to the race category. Preference would be

to leave question intact (with yes or no answer as above) and add subcategories to be selected only if answering yes to it.

Choose one or more Races

The workgroup recommends using a standard race question. The recommended wording is:

What is your race? Select one or more of the following categories.

- White
- Black or African American
- Asian
- American Indian or Alaska Native
- Native Hawaiian or Other Pacific Islander

Preferred order is based on national frequency as indicated above. This is based upon internal NCES guidance for their own surveys. This recommended order can be changed by the institution to be based on their own population frequency but it should not be ordered alphabetically.

Definitions must available to respondent after questions or in separate section or in pop-ups/links for web applications. Institutions can choose to add definitions to answers.

Subcategories can be done for races as long as it is clear the subcategory is part of the appropriate category and when subcategory selected, it is answering Yes to specific category. Preference is to have student or employee select race category and when a category is selected then provide the subcategory. For example, if subcategories were used for the Asian it would look like this.

- Asian
(if selected please indicate appropriate subcategory below)
 - Chinese
 - Japanese
 - Vietnamese
 - Other Asian

Due diligence question

The workgroup recommends there should not be any type of due diligence question. This additional question conflicts with OMB guidance of not allowing an unknown answer. Having the respondent answer “I prefer not to respond” would constitute an unknown

answer. This also conflicts with the State law for public institutions under advice given by the MHEC Assistant Attorney General.

Definitions which should be available to respondent or added to questions

The workgroup recommends the use of standard definitions for the race categories. The recommended wording is:

White: A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Black or African American: A person having origins in any of the black racial groups of Africa.

Hispanic or Latino: A person of Cuban, Mexican, Puerto Rican, Cuban, South or Central American, or other Spanish culture or origin, regardless of race.

Asian: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

American Indian or Alaska Native: A person having origins in any of the original peoples of North and South America (including Central America), and who maintains cultural identification through tribal affiliation or community attachment.

Native Hawaiian or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

1.4 Citizenship Recommendations

IPEDS/MHEC definitions

The aggregate data collection categories used by IPEDS under the new 1997 race/ethnicity standards continue to require the distinction of U.S. citizens “group” from nonresident aliens (or foreign) for both students and staff. Under IPEDS and State definitions the U.S. citizens “group” is defined as:

- U.S. citizens “group”: Consists of U.S citizens, U.S. nationals, resident aliens and other eligible (for financial aid purposes) non-citizens who are not citizens or nationals of the United States and who have been admitted as legal immigrants for the purpose of obtaining permanent resident alien status (and who hold either an alien registration card (Form I-551 or I-151), a Temporary Resident Card (Form I-688), or an Arrival-Departure Record (Form I-94) with a notation that conveys legal immigrant status such as Section 207 Refugee, Section 208 Asylee, Conditional Entrant Parolee or Cuban-Haitian) are to be reported in the appropriate racial/ethnic categories along with United States citizens.
 - Resident alien (or other eligible non-citizens): A person who is not a citizen or national of the United States and who have been admitted as legal immigrants for the purpose of obtaining permanent resident alien status (and who hold either an alien registration card (Form I-551 or I-151), a Temporary Resident Card (Form I-688), or an Arrival-Departure Record (Form I-94) with a notation that conveys legal immigrant status such as Section 207 Refugee, Section 208 Asylee, Conditional Entrant Parolee or Cuban-Haitian).
 - U.S. national: A native of American Samoa or Swain’s Island.
- Nonresident alien: A person who is not a citizen or national of the United States who is in this country on a visa or temporary basis and does not have the right to remain indefinitely

Even though the new two question format for individuals does not allow specifying of the citizenship status, institutions are required to collect and maintain this citizenship and visa information. Therefore if an institution relied on the previous 1977 race/ethnicity categories to collect and report citizenship, the institution must develop a new separate method to collect this information. The workgroup recommends institutions collect citizenship information to determine whether U.S. Citizen Group or nonresident alien.

The USM Peoplesoft system uses a table that provides cross reference of student Visa type to the citizenship determination. This is in Appendix B and is provided as additional information to institutions.

FAFSA citizenship use

The federal student financial aid program uses the FAFSA form as an application. This form has a clearly developed methodology and definitions for collecting citizenship information. The following question format is extracted from the FAFSA form.

14. Are you a U.S. citizen? Mark one. **See Notes page 2.**

- a. Yes, I am a U.S. citizen (U.S. national). Skip to question 16.....
 b. No, but I am an eligible noncitizen. Fill in question 15..... 15. Alien Registration Number
 c. No, I am not a citizen or eligible noncitizen..... A _____

These are the short version instructions for this question identified as Notes for questions 14–15(page 7).

If you are an eligible noncitizen, write in your eight- or nine-digit Alien Registration Number. Generally, you are an eligible noncitizen if you are (1) a permanent U.S. resident with a Permanent Resident Card (I-551); (2) a conditional permanent resident (I-551C); or (3) the holder of an Arrival-Departure Record(I-94) from the Department of Homeland Security showing anyone of the following designations: “Refugee,” “Asylum Granted”, “Parolee” (I-94 confirms that you were paroled for a minimum of one year and status has not expired), “Victim of human trafficking,” T-Visa holder (T-1, T-2, T-3, etc.), or "Cuban-Haitian Entrant." If you are in the U.S. on an F1 or F2 student visa, a J1 or J2 exchange visitor visa, or a G series visa (pertaining to international organizations), you must fill in square c. If you are neither a citizen nor an eligible noncitizen, you are not eligible for federal student aid. However, you may be eligible for state or college aid.

The longer more complete instructions and definitions for this FAFSA question are as follows:

14. Citizenship status. You can receive federal student financial aid only if you are a U.S. citizen or an eligible noncitizen. If you have changed from a noncitizen to a citizen and have not informed the SSA, contact the SSA to update your status. Otherwise, the SSA may report that you are not a citizen, and you will have to provide citizenship documentation before receiving aid.

For financial aid purposes, an **eligible noncitizen** is one of the following:

- A U.S. permanent resident who has a Permanent Resident Card (I-551 or I-151).
- A conditional permanent resident (I-551C).
- A noncitizen with an Arrival-Departure Record (I-94) from the Department of Homeland Security (DHS) (specifically, the U.S. Citizenship and Immigration Services) showing any one of the following designations: "Refugee," "Asylum Granted," "Paroled" (the I-94 must confirm 'paroled for a minimum of 1-year and status' has not expired), "Conditional Entrant"(valid only if issued before April 1, 1980) or "Cuban-Haitian Entrant, status pending."
- A student also may qualify as an eligible noncitizen if he or she holds a T-visa (for victims of human trafficking) or if his or her parent holds a T-1 visa.

If you are neither a **citizen nor an eligible noncitizen**, you are not eligible for federal student aid; for example, you are not eligible if you are in the U.S. on one of the following:

- An F-1, F-2 or M-1 student visa.
- A J-1 or J-2 exchange visitor visa.
- A B-1 or B-2 visitor visa.

- A G series visa (pertaining to international organizations).
- An H series or L series visa (allowing temporary employment in the U.S.).
- A "Notice of Approval to Apply for Permanent Residence" (I-171 or I-464).
- An I-94 stamped "Temporary Protected Status."

It is also recommended that institutions add an additional question to the above FAFSA format that collects the Visa type for both eligible and non-eligible students. This information should be part of the student's record and is important to comply with other federal requirements such as SEVIS.

MHEC's U.S. Citizenship Group

The State's collection systems that provide student data are Degree information System (DIS), Enrollment Information System (EIS), High School Graduate System (HGS), Transfer Student System (TSS) and the Financial Aid Information System (FAIS). These systems will be modified to include a one character field to define whether the student is in the U.S. citizenship group definitions. The field will be established the same as it is used in the Employee Data System (EDS) which is collected from public institutions only. This field will be defined as:

U.S. Citizenship Group

- Code "1" = U.S. citizen, U.S. national, permanent resident, resident alien
- Code "2" = Non-resident alien (also known as foreign)

Institutions will be responsible for gathering the data needed to determine the proper classification of a student and employees. This is not a new requirement for either students or employees. The old 1977 race/ethnicity standard required this be done for all students whether by using the categories for the old standards directly self-reported or by a separate collection of this information that was used to produce or verify the self-reported category. For employees, this data was also previously collected for public in the State EDS and for independents direct IPEDS Human Resources (HR) reporting. Institutions should review their current methods for collecting this citizenship data to insure it complies with the new race/ethnicity standards both for definitions and for reporting to State and federal IPEDS.

Institutions should consider policies and procedures that insure the student's citizenship remains updated as students change their status. It is recommended that citizenship information be reviewed and updated at least once a year. Preferably this would be prior to the federal and State reporting requirements in the fall of each year. One of the major ways is to tie the updating of U.S. Immigration and Customs Enforcement's SEVIS to information within your student information system on citizenship status. This would be especially focused on the non-resident aliens.

In no way should any of this guidance abrogate an institutions compliance with any other federal agency requirements for reporting on permanent residents, resident aliens or non-

resident aliens. One of these is SEVIS, Student and Exchange Visitor Information System, from the U.S. Immigration and Customs Enforcement

U.S. Citizenship and Immigration Service Definitions

Any methodology chosen must comply with requirements from all federal agencies such as the U.S. Citizenship and Immigration Service and U.S. Immigration and Customs Enforcement Office. SEVIS, Student and Exchange Visitor Information System, is one of those requirements for institutions having nonresident alien student population.

In addition to the definitions used by IPEDS above, these additional ones used by the US Citizenship and Immigration Service are provided. It should be noted that these definitions are different but consistent with the definitions given above that are used by IPEDS and MHEC. These are only provided for information and as a reference for SEVIS.

- **Citizenship from US Citizenship and Immigration Service :** *All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.* - XIV Amendment to the U.S. Constitution. Citizenship is one of the most coveted gifts that the U.S. government can bestow, and the most important immigration benefit that USCIS can grant. Most people become U.S. citizens in one of two ways: by birth, either within the territory of the United States or to U.S. citizen parents, or by Naturalization. In addition, in 2000, Congress passed the Child Citizenship Act (CCA), which allows any child under the age of 18 who is adopted by a U.S. citizen and immigrates to the United States to acquire immediate citizenship.
- **US Citizen (citizenship) or permanent resident (permanent resident or green card) from U.S. Citizenship and Immigration Service:** A U.S Citizen is a person born in the U.S. or who meets specific criteria related to birth and parents. A U.S. Citizen also may be a person who is ‘naturalized’ by meeting certain criteria. A permanent resident is a person who has been granted permission to remain in the U.S. indefinitely, so long as they continue to meet the qualifications or elect to relinquish the status. These individuals are also known as ‘green card’ holders.
- **Resident Alien or Nonresident Alien from U.S. Citizenship and Immigration Service:** U.S. immigration law views individuals who are neither U.S. citizens nor permanent residents as ‘aliens’. U.S. tax law divides these ‘aliens’ into two categories.
 - Resident alien – a person who is not a U.S. citizen or permanent resident, but has met the substantial presence test (mathematical test of time within U.S.)

- Nonresident alien – a person who is not a U.S. citizen or permanent resident, and has not met the substantial presence test.

1.5 Re-survey/Mapping Recommendations for current Students and Staff

In the transition to the new 1997 race/ethnicity standards, the U.S. Department of Education through their final guidance dated October 19, 2007 does NOT require institutions to re-survey their continuing students and staff (includes faculty). The guidance does require that the new students and staff for the AY 2010-2011 year have the new 1997 standards for race/ethnicity applied to them. It is recognized that transition to the new standards with a goal of achieving full compliance and obtaining the highest quality level of race/ethnicity data will require re-survey. While it will ultimately be up to each institution as to the method they will use to transition, the workgroup is providing this guidance to assist them and to achieve uniformity in data quality in Maryland.

As indicated in the section on Data Storage and Retention, institutions should retain at least two sets of race/ethnicity data for students and staff. These would be the old 1977 standards and the new 1997 two question student/staff level of self reported data. These old 1977 data are important in many different ways. Not only as a permanent non-updated record for all students and staff self reported data under the 1977 standards but also as a mapping aid to support the re-surveying effort.

The workgroup recommends that institutions re-survey their current students and staff. The institution will need to decide how and when to do this re-survey. This could start in the AY2009-2010 but it is further recommended that it is not undertaken prior to the fall 2009 semester. Re-survey schedule is based upon this plan that the new 1997 race/ethnicity standards be started in the AY 2010-2011. The re-survey can be incorporated into normal institution procedures such as registration. Alternatively, an institution could choose to do an independent survey to obtain the new data. This alternative method would be the most practical for collecting from staff. There are advantages and disadvantages to both methods. The embedding of the collection into normal procedures may produce better responses to the new questions while a separate survey may be easier to manage for this one-time need.

The use of mapping the 1977 data to the new 1997 categories provides the potential for reducing the occurrence of unknown category individuals. This method does not rely solely on the re-survey and, of course, the response rates. There is a danger that the new 2 question format will not be answered in a survey just because it is a change in the way race/ethnicity is collected. The use of mapping will bring forward the old data to the new format so an institution will have all prior self reported data that will constitute a base of race/ethnicity data. The data mapped must be replaced as current race/ethnicity when new 1997 format answers are provided by the student or staff.

The use of mapping by itself is not the preferred method. The following table maps the old 1977 standards to the new 1997 format for individuals. The new standards are the individual 2 question format not the new federal aggregate reporting categories.

1977 Standards	New Citizenship Group	New Ethnicity Hispanic/Latino?	New Race Category
Black or African American	YES	NO	Black or African American
American Indian or Alaskan native	YES	NO	American Indian or Alaskan native
White	YES	NO	White
Asian/Pacific Islander	YES	NO	Not available
Hispanic	YES	YES	Not available
Foreign (Non-resident alien)	NO	Not available	Not available
Unknown/Other	Not available	Not available	Not available

As this table shows there are several problems with mapping. First the splitting of the 1977 Asian/Pacific Islander category into two separate categories in the new 1997 standards cannot be accomplished correctly without additional efforts. The institution would need to adopt one of the following recommended fixes listed in preferred order to address this:

- Special re-survey of only those students in the Asian/Pacific Islander category to identify proper new category
- Use other information in the student or human resources system to provide the ability to identify the correct new category
- Force all Asian/Pacific Islanders to the new Asian category

It must be recognized that the last fix does not produce totally correct information and would probably need to be updated based upon a subsequent full re-surveying process.

The individuals in the 1977 Hispanic category will not have any race information. Though this is not necessary for the submission to the U.S. Department of Education due to the trumping rules for the new 1997 federal aggregate reporting categories, it does represent a deficiency in the consistency and quality of race/ethnicity data for the total institution population. The same is true for old 1977 foreign category as it will not have either the race or ethnicity data for these individuals.

In addition mapping will not be able to identify students and staff who are more than one race.

The workgroup recommends that mapping be used in conjunction with full re-surveying of students/staff. This technique allows an institution to gain the benefits of both methods while achieving the highest quality and completeness of race/ethnicity data. The re-survey can be pre-populated with mapped data and instructing individual to update this

race/ethnicity data if it is not correct. When doing this method, the re-survey instructions should emphasize the needs to update to new standards. These include:

- Asian/Pacific Islanders should declare themselves into proper category
- Individuals who are Hispanic/Latino should now complete race even though it is absent from mapping
- Foreign (non-resident aliens) are now requested to complete the ethnicity and race questions

The use of mapping could also be done after re-surveying to back fill individuals not self reporting under new standards. This is considered as acceptable since it is still self reported data by individual and institution does not know why individual did not self report (intentional or oversight).

One issue that will need to be addressed by the institution is the student or employee who wishes to respond to the re-survey as not declaring any race or ethnicity. It could be assumed that the individual not responding to a re-survey is not changing their race/ethnicity and accepting the current information at the institution. It is possible that an individual responds to the re-survey with no information declared. The re-survey instrument needs to address this possible scenario by making clear when no information declared means no change in individual's information or means accepting a new no declared race/ethnicity. Individuals do have the right to change their declaration even to a no declare race/ethnicity at any point in their enrollment or employment. This must be done without changing or adding to the two question format. Institutions cannot add a third question on not declaring but could have instructions that identify how answers are interpreted. For example, if you return a paper survey or click on submit on web form without answering the above questions, you will be considered as having no race/ethnicity declaration.

Institutions should consider the use of a race/ethnicity reporting indicator in their systems which would identify how the new 1997 race/ethnicity data was obtained. This would indicate whether the data for each individual is mapped, resurveyed or observer based. This is discussed further in the Data Storage and Retention section.

The workgroup recommends that institutions monitor the level of unknown under the new 1997 standards. If this level increases significantly from the historical trend under the old standards, the institution should consider follow-up surveys of those individuals with unknown (did not self report). This effort should include attempts to resurvey any individual that complete new 1997 race/ethnicity or citizenship data in addition to unknown.

1.6 Past cohort Surveys (TSS, GRS) Recommendations

There are two surveys collected that use data from cohorts of students from years prior to the current or the previous year period. These are the federal IPEDS Graduation Rate Survey (GRS) and the Commission's Transfer Student System (TSS). These two systems are applicable to Maryland higher educational institutions in different ways.

The first one is the IPEDS GRS which typically collects on either 3 or 6 year old cohorts depending on whether the institution is two or four year. The IPEDS GRS is uploaded for public institutions only from the Commission longitudinal study system. Institutions can enhance the data past the limitations of the Commission process. These enhancements include dealing with federal reporting exemptions and tracking students outside of the State. Independent institutions in Maryland are required to file GRS directly with the federal IPEDS.

The second system is the Commission's TSS which tracks performance of public community college transfer students at four year public institutions. This system collects data on the past five years of transfer cohorts at four year public institutions. Ultimately, the data is enhanced at the Commission by adding additional information on recent community college graduation and whether the transfer receives a degree from any other public institution rather than starting one. This data is collected from four year public institutions and is returned to the public community colleges.

These two systems have a special problem in that conversion to the new race/ethnicity standards deals with students no longer at the institution. The students may have left the institution as a result of dropping out, transferring to out of state or independent institutions or graduating. The federal final guidance and email follow-up from IPEDS staff does not require re-survey of GRS cohort and the Commission will follow that for its own TSS. Guidance from IPEDS is not clear whether the original cohort year based race/ethnicity data should be used or replaced with the most current available race/ethnicity data for student. The Commission follows the basic rule of cohort analysis by not modifying the original cohort data and therefore reporting on the race/ethnicity data available at cohort creation time.

The workgroup recommends an approach that handles both the GRS and TSS in the same manner. This allows for a consistent method for handling past cohort based data. The approach will be to use mapping for cohort data that are for years prior to AY2010-2011 in reporting of TSS and GRS submissions starting with 2011 collection. This is explained in the following discussions on each system.

The GRS is a federal survey and has to meet the requirements of the IPEDS reporting. Therefore in the 2010 survey the data reported to IPEDS must conform to the new 1997 race/ethnicity standards. GRS is handled differently for public versus independent institutions. The Commission's longitudinal study system is used to prepare the GRS for public institutions and uploads to IPEDS. The independents must provide this data themselves as they do not provide full student data to the Commission.

The public institutions have the right to review and modify this uploaded data to meet various federal exceptions and to add data on transfers that the State cannot provide in their data. The race/ethnicity data collected on cohorts prior to the 2010 cohort will be based on the old 1977 race/ethnicity standards. In order to meet the federal requirements and their expectations, the GRS data for all cohorts prior to 2010 will be mapped to the new 1997 standards when submitted to IPEDS. This mapping will be done by the Commission in the interface to IPEDS GRS and not in their internal systems.

This table shows the mapping at the aggregate level for GRS reporting of cohorts prior to the 2010 cohort. This technique will result in no counts in the Pacific Islanders or Multiple Race categories,

1977 Aggregate Standards	1997 Aggregate Standards
Black or African American	Black or African American
American Indian or Alaskan native	American Indian or Alaskan native
White	White
Asian/Pacific Islander	Asian
Hispanic	Hispanic
Foreign (Non-resident alien)	Foreign
Unknown/Other	Unknown/Other

This conversion will continue until the cohorts based on 2010 are reported. This means the 2016 IPEDS submission for four year publics and the 2013 submission for the two year publics.

Institutions reviewing the GRS data uploaded by the Commission have the option to make changes to the race/ethnicity aggregate category counts when other changes (such as federal exclusions) are made.

The TSS is a Commission based survey and does not provide data to the federal IPEDS. The mandatory conversion year of 2010 established by the federal government will govern the reporting of the new 1997 race/ethnicity standards. This means the race/ethnicity standard reported will be based upon the year collected. All TSS submissions and all of the cohorts contained within them starting with 2011 collection year will be reported with the new 1997 race/ethnicity standards. Therefore all the TSS submissions through 2010 will have all 5 cohorts with the old 1977 standards. Starting with the TSS 2011 submission, race/ethnicity reporting for all 5 cohorts in each yearly submission will be based upon the new 1997 standards. This will require the public institutions that do TSS submissions to report under the new standards for all cohorts

even though they may be for prior years. Data for the older cohorts must be mapped from the original cohort year race/ethnicity data regardless of whether new information is received through re-surveying. The record format for TSS will be modified for 2011 submission to accept only the new standard. The institution will map old data to the new using the same technique as prescribed for GRS below. The following table shows the transition for each community college transfer cohort and how TSS reporting will be done.

TSS submission year	AY 2005 2006	AY 2006 2007	AY 2007 2008	AY 2008 2009	AY 2009 2010	AY 2010 2011	AY 2011 2012	AY 2012 2013	AY 2013 2014	AY 2014 2015
2010	Old	Old	Old	Old	Old					
2011		Map	Map	Map	Map	New				
2012			Map	Map	Map	New	New			
2013				Map	Map	New	New	New		
2014					Map	New	New	New	New	
2015						New	New	New	New	New

In this table, the following definitions apply:

- Old – 1977 race/ethnicity standards
- Map – mapped from 1977 race/ethnicity and reported under 1997 standards
- New – 1997 race/ethnicity standards

These reporting requirements for TSS require the data for the cohort indicated as mapped above to be converted from the 1977 aggregate standards to the individual two question 1997 standards. The following table provides guidance on the methodology to do this mapping.

1977 Aggregate Standards	U.S. Citizen Category	1997 Ethnicity	1997 Race Fields marked Yes
Black or African American	Yes	No	Black or African American
American Indian or Alaskan native	Yes	No	American Indian or Alaskan native
White	Yes	No	White
Asian/Pacific Islander	Yes	No	Asian
Hispanic	Yes	Yes	None (all blank)
Foreign (Non-resident alien)	No	None (blank)	None (all blank)
Unknown/Other	Yes	None (blank)	None (all blank)

1.7 Data Storage and Retention Recommendations

Maryland higher education Institutions will need to address the storage and retention needs for data collected under the new race/ethnicity standards. For individual student and employee records the raw data that answers the individual two-question multiple race format must be stored. According to federal guidance, it is not acceptable to just store and retain the federal aggregate level information derived from mapping, re-surveying or collected from students entering in the AY2010-2011 (and beyond). Institutions are required to keep the original individual’s responses to the new two question format.

Storage

The workgroup recommends that each institution review their implementation of the new race/ethnicity standards to insure both federal and State requirements are addressed. There are many different ways to approach meeting requirements. Different approaches may be needed due to the institutions own needs or through restrictions placed upon them in the design of packaged systems for student or employee administrative systems by their software vendors. The goal to be achieved is storage of the new two-question format data. The approach discussed here is one suggested way. It will be used in the MHEC collection systems for gathering unit record (or individual) data. Under the MHEC approach, there are seven new data fields that are needed to be maintained in unit data records for students and employees. These new fields will supply the data required for individual records (unit record) for reporting to state and to meet IPEDS (Title IV) requirements.

Data Field in Unit Record	Width	Values	Code value meanings
US Citizen Group Category	1	1 or 2	1 – U.S. Citizenship Group; 2 – non-resident alien (foreign)
Hispanic/ Latino Ethnicity	1	Y, N, or blank	Y - yes; N – no; blank – not answered
White	1	Y or blank	Y - yes; blank – not answered
Black or African American	1	Y or blank	Y - yes; blank – not answered
Asian	1	Y or blank	Y - yes; blank – not answered
American Indian or Alaska Native	1	Y or blank	Y - yes; blank – not answered
Native Hawaiian or Pacific Islander	1	Y or blank	Y - yes; blank – not answered

Note: For complete explanation of U.S. Citizen Category see section on Citizenship.

The workgroup agrees with federal recommendations by IPEDS that the “old” field for race/ethnicity be kept and any new standards data collected for race/ethnicity would be added as new fields to the student or employee record. The original race/ethnicity data should be kept in the record and never overwritten. This may require dealing with mapping or bridging at analysis time. MHEC systems, such as EIS, will provide for both

old 1977 standards data (as available) and new 1997 standards (required) to be reported in their systems starting in 2010. The old standard data fields should be reported as available for several years starting in 2010 and will eventually become an optional submission field.

The workgroup recommends that each institution consider implementing a race/ethnicity reporting indicator for their own use. The workgroup acknowledges that this may be too burdensome or not available in some systems. Institutions should consider the use of a race/ethnicity reporting indicator in their systems which would identify how the new 1997 race/ethnicity data was obtained. This would indicate whether the data for each individual is mapped, resurveyed or observer based. Institutions may expand this indicator to meet specific or more detailed needs. This field would be kept by the institution and is **not** reported to the Commission or IPEDS. This field could be 1 character in size with the possible following codes:

- M – r/e data was obtained by mapping of the old 1977 standard data
- R – data is based upon individual answering the new two question format for the new 1997 standard through either resurvey or new declaration
- O – data is based upon observer declaration (main use is employee declaration by institution staff)

Whether or not this field is used the institution should document their conversion process to the new standards (see following discussion under retention).

This new race/ethnicity data storage must conform to FERPA and any other applicable federal and State confidentiality requirements that are currently applied to student and staff records at the institution.

Reporting to MHEC

Maryland Annual Collections Unit Record Data Systems will have the seven new fields added to the unit data record for the following systems. MHEC will continue to collect the 1977 old race/ethnicity field (as available) for several years in these data systems.

MHEC collection system	Institutions submitting system
Enrollment Information System (EIS)	<ul style="list-style-type: none"> ▪ All public ▪ Independents under MICUA agreement
Degree Information System (DIS)	<ul style="list-style-type: none"> ▪ All public ▪ Independents under MICUA agreement
High School Graduate System (HGS)	<ul style="list-style-type: none"> ▪ All public ▪ Independents (MICUA members)
Financial Aid Information System (FAIS)	<ul style="list-style-type: none"> ▪ All public ▪ Independents under MICUA agreement (for just MD residents receiving State aid)
Transfer Student System (TSS)	<ul style="list-style-type: none"> ▪ All public four year
Employee Data System (EDS)	<ul style="list-style-type: none"> ▪ All public

For independent institutions that do not submit all students in the DIS and EIS unit record data systems, there are three MHEC Forms requiring race/ethnicity aggregate data. The forms are listed below. The institution will need to maintain and store the new two question format data collected for each student and map it to the new aggregate data fields for MHEC state and federal reporting.

MHEC Aggregate Collection system	Institutions submitting system
Form S-1 Enrollment By Program	<ul style="list-style-type: none"> Only independents who do not submit all students in unit record systems above.
Form S-4 Residence by County	<ul style="list-style-type: none"> Only independents who do not submit all students in unit record systems above.
Form D - Degree and Other Formal Awards	<ul style="list-style-type: none"> Only independents who do not submit all students in unit record systems above.

In addition the surveys above for enrollment and degree data, all surveys used by the Commission that collect aggregate race/ethnicity data will use the new federal aggregate categories starting in either 2010 or 2011 as based upon the data reporting period being AY2010-2011.

The mapping of the individual two question format to the new federal/State aggregate categories for the 1997 race/ethnicity standards is defined in the following table:

Individual 2 question format	Response	New federal aggregate category
U.S. Citizenship Category?	No →	Non-resident alien (foreign)
	Yes next question	
Hispanic or Latino?	Yes →	Hispanic
	No or blank next question	
Which races? (only one)	Yes single one selected →	Single race category selected from: <ul style="list-style-type: none"> Black or African-American White American Indian or Alaska Native Asian Native Hawaiian or other Pacific Islander
	No next question	
Which races? (more than one)	Yes multiple selected →	2 or more races
	No next question	
No information provided	→	Race and Ethnicity Unknown

Note: For complete explanation of U.S. Citizen Category see section on Citizenship.

Retention

This guidance provided based upon the federal rules and the State needs for maintaining the original responses from staff and students to support requests for racial and ethnic data. These are focusing on the length of time for the data to be maintained by them. The retention need can be met by the student or employee system itself or augmented by the saving of extraction files (such as MHEC submissions) that were used as the basis for federal reporting. The workgroup recommends that institutions determine retention to meet their own needs as well as the federal and State needs. It is the institution's responsibility for necessary data retention.

The federal rules are for three years as summarized by the references below:

- In the Federal Register / Vol. 72, No. 202 it says that when the US Department of Education (ED) requests racial and ethnic data from educational institutions, the ED instructs how long institutions are to keep individual original responses. It also says that at a minimum, under 34 CFR 74.53 and 80.42, generally an ED grantee or sub-grantee must retain for three years individual responses of racial/ethnic data. One exception is if there is litigation within the three years the records must be maintained until completion of the action. See Federal Register Education's Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data
<http://a257.g.akamaitech.net/7/257/2422/01jan20071800/edocket.access.gpo.gov/2007/pdf/E7-20613.pdf>
- Retention of Data: (AIR Alert #14, Update #3) Institutions are required to keep the detailed information on student and employee responses for at least three years (or, if needed for litigation, a claim or an audit, until the completion of the action), including racial identification for individuals choosing Hispanic/Latino and multiple race responses. This information may be requested for an Office for Civil Rights (OCR) investigation or compliance review or other legal action.

The State MHEC needs are for two years as summarized by the references below:

- Recommended that all institutions retain all submitted data for 3 years after submission
- Public Institution Enrollment Audits uses EIS data gathered in previous year and require keeping data for at least 2 years

There are other institution needs that may need to be met and must be considered:

- Institutions will need to address handling the old and new standards in data warehouses and auxiliary systems that capture and maintain data for the purpose of reporting to the Commission or IPEDS
- The institution should keep on file documentation about how the race/ethnicity code was derived i.e. how and when the institution was resurveyed, was the old data mapped for missing responses. This documentation is important because

institutions survey electronically and post to the database so there may not be a “paper trail” or process description.

- Internal and external institution audit needs must be addressed
- Data for federal Graduation rate Survey (GRS) and State Transfer Student System (TSS) submissions are based upon past cohorts and may require longer period for retention of individual student race/ethnicity data

Section 2

Recommendations for Revision for Transfer-in Reporting

2 Recommendations for Revision for Transfer-in Reporting

IPEDS added a new column to the Fall Enrollment Survey Part A – Enrollment by Racial/Ethnic Category and Gender for Undergraduate Full-time and Part-time students to collect Degree/Certificate Seeking Transfers-In. This change was mandatory for the IPEDS 2007-08 survey and required institutions to manually extract and update this information. IPEDS Definition of Transfer-in Student is a student entering the reporting institution for the first time, but known to have previously attended a postsecondary institution at the same level (e.g. undergraduate, graduate). The student may transfer with or without credit.

There is a need to capture this transfer-in information within the Maryland Annual Collection to maintain consistency between federal and State information, reduce institution burden by consolidating this information and allowing it to be uploaded by MHEC for IPEDS Fall Enrollment. This can be addressed by capturing Transfer-in students using the Maryland Annual Collection Enrollment Information System (EIS) First-Time Flag field. The definition of the First-time flag is a flag that indicates if the student is enrolled within the collection period for first time at any institution at the appropriate program level Undergraduate or Graduate). It is a required one digit numeric field. The existing EIS **First Time Flag codes and definitions** are:

- Code 1 – First time undergraduate
FIRST-TIME UNDERGRADUATE - A student attending any institution for the first time at the undergraduate level. Include students enrolled in the Fall term who attended college for the first time in the preceding summer. Also includes students who entered with advanced standing (college credits earned before graduation from high school or placement testing) in the appropriate semester regardless of entering undergraduate fall student level. High school students who are concurrently enrolled are not considered first-time.
- Code 2 – Continuing Undergraduate
- Code 3 - First time Graduate
FIRST-TIME GRADUATE - A student enrolled at the graduate level for the first time. Includes graduate students enrolled in the fall term who entered graduate school for the first time in the preceding summer.
- Code 4 – Continuing Graduate
The continuing graduate does include all graduate students who are not first-time graduates.

Collection of transfer-in and concurrent students

The workgroup recommends that the first time flag be expanded to cover the transfer-in reporting through modification of coding. This would also allow further data improvements by differentiating the transfer-in and the concurrent students from the continuing student. The following two codes will be added to the first time flag field:

- Code 0 – Student still enrolled in high school and taking college courses. This is any student who has not yet received a high school diploma but is still in high school on track to completion. The student may be enrolled in a number of semesters or terms in this status. The student may have also attended multiple colleges before high school graduation. High school students concurrently enrolled before graduation from high school are not considered to be first-time until after high school graduation.
- Code 5 – An undergraduate student entering the reporting institution as a new student but known to have previously attended another undergraduate postsecondary institution. The student may transfer with or without credit.

Because of the complex movement of students the determination of transfer can be difficult. This trumping rule guidance is provided for institution in determining the correct category for students. The determination should follow this order.

1. concurrent high school enrollment -
2. first-time undergraduate status - This would be to any institution and using definition above.
3. transfer-in - This determination may follow institution readmit policies or policies governing transfer. The ultimate decision on whether the student is transferring from another institution or returning from prior enrollment at same institution must be made by institution. The issue of a student enrollment in multiple institutions can create difficult determination of transfer-in but institutions should establish and apply a consistent method.
4. continuing - Students who are continuing enrollment at your institution. This should include students who maintain enrollment at institution even though they may have enrolled concurrently at other institutions. Again institution policies or readmit or transfer should be considered when making this determination.

Paper form changes to S-1

The major effect will be on the aggregate enrollment reporting form known as the S-1, Enrollment by Program, would be in the data detail of the lines on the form. Basically the student levels now used will be replaced by basing them on the first time flag codes.

The UG lines would be based on:

- Concurrent student
- First-time student
- Transfer-in student
- Continuing student

and graduate lines based upon:

- First-time student
- Continuing student.

Schedule

The workgroup recommends that this change to allow collection of transfer-in and concurrent students be required in the 2009 collection (for fall 2009 enrollment). The consensus was to make these changes prior to the race/ethnicity scheduled for 2010 collection.

2008 – The 2010 Workgroup finalize action plan to adopt transfer-in reporting for federal changes

Winter 2009 – Commission releases the new EIS specifications (coding changes for the first time flag field) and revised format of the aggregate submission of S-1 and S-8 reporting forms

Spring and summer 2009 – institutions make changes to the reporting process that provides data to the Commission

Summer 2009 – Commission modify its systems to handle new coding for first-time flag for EIS and IPEDS 2009-2010 upload for EIS 09 data

Fall 2009 –S forms submitted to Commission under the new 2009 coding changes. EIS must be submitted using 2009 first time flag field coding changes.

Spring 2010 – fall 2009 enrollment data reported to IPEDS with transfer-in data

Section 3

Recommendations for Prior Year High School Graduation Reporting

3 Prior Year High School Graduation Reporting

The IPEDS Fall Enrollment Survey – Part C – Residence of First-time Degree Seeking Undergraduate students is mandatory in even-numbered years (next required year is the 2010 IPEDS collection). MHEC preloads data for column (1) Total first-time undergraduate (degree/certificate seeking only), but does not have information to determine column (2), “Those who graduated from high school in the past 12 months”.

There is a need to capture this prior year high school graduation information within the Maryland Annual Collection to maintain consistency between federal and State information, reduce institution burden by consolidating this information and allowing it to be uploaded by MHEC for IPEDS Fall Enrollment. This can be addressed by creating a new field in the Maryland Annual Collection Enrollment Information System (EIS). The workgroup recommends this new field be added to collect an indicator of whether the undergraduate student graduated from high school or received a GED in the preceding year (previous 12 months).

This new field will be entitled high school prior year graduation flag. The coding of this field would be as follows:

- 1 – yes - Student graduated from high school or received GED in the preceding year (prior 12 months) to their fall enrollment.
- 0 – no - Student did not graduate from high school or receive GED in the preceding year (prior 12 months).
- 9 – unknown - Student for which the high school graduation period is not available or unknown.

Paper form changes to S-8 Residence by State

The major change to this form would be to add two columns to report the number of first time undergraduate students who are degree seeking and a column for first time undergraduate who graduated from high school in the preceding year.

Schedule

Even though the need for the next federal submission is not until 2010, this change will be introduced in the 2009 collection year. The workgroup recommended the 2009 year to implement this reporting. It was to be accomplished prior to the race/ethnicity scheduled for 2010.

2008 – The 2010 Workgroup finalize action plan to adopt federal residency reporting requirements.

Winter 2009 – Commission releases for the 2009 collection the EIS specifications (to add the high school graduation field) and revised format of the aggregate submissions of S-1 and S-8 reporting forms

Spring and summer 2009 – institutions make changes to the reporting process that provides data to the Commission

Summer 2009 – Commission modify its systems to handle new field for prior year high school graduation flag for EIS and IPEDS 2010-2011 upload for data.

Fall 2009 – EIS and S forms submitted to Commission with the new prior high school graduation flag field.

Fall 2010 – EIS and S forms submitted to Commission with the new prior high school graduation flag field.

Spring 2011 – fall 2010 enrollment data reported to IPEDS with new information for first-time undergraduate degree seeking students and those who graduated from high school in preceding year.

Section 4

Recommendations for Federal First-Professional (and First-Professional
Certificate) Degree Levels Elimination

4 Recommendations for Federal First-professional Degree Levels Elimination

The U.S. Dept. of Ed. (IPEDS) is making changes in the national collection of degree level data by eliminating the use of first-professional and first-professional certificate categories. Degrees in these categories are re-classified (moved) to one of three new Doctor's degree levels, the Master's level or the Certificates of Advanced Studies.

Information on this change is at the following links:

- http://nces.ed.gov/ipeds/news_room/trp_update_to_07202006_16.asp
- http://nces.ed.gov/IPEDS/news_room/ana_Changes_to_1_29_2008.asp

The federal mandatory compliance years are in 2009 collection year for the fall 2009 enrollment (uploaded to IPEDS in Spring 2010) and optional in the 2009 collection year for the AY2008-2009 completions data. This change will affect institution program designations and reporting to the Commission and IPEDS. It will also affect program approval process at the Commission.

The workgroup recommends this change within the 2009 Annual Collection Cycle instead of with the 2010 Reporting Revisions by establishing new degree level coding structure for all of its reporting systems. Additionally, the Degree Information System reporting system is recommended to be changed in 2009 for the AY 2008-2009 degree period. Besides addressing the first professional elimination this change will also standardize the degree level coding across all reporting systems. This approach will also preserve the data integrity of past reporting by leaving the older (and now obsolete codes) in place in historical data.

A previous proposal developed in 2007 which minimized the impact by keeping the existing structure of coding and degree level and adopting degree level name changes will not be pursued. This proposal was pursued in early 2007 under a prior plan by IPEDS to eliminate the first professional starting in 2008. During the period of May-June 2007 the Commission Academic Affairs staff worked with the institution academic staffs on this degree elimination. This effort and the previous proposal were suspended due to delays by IPEDS to implement the first-professional elimination.

Reclassification to the new degree levels

The following table identifies the overall reclassification of the first professional degrees.

Current Award Categories (Baccalaureate and above)	New Award Categories (Baccalaureate and above)
Bachelor's degree	Bachelor's degree
Postbaccalaureate certificate	Postbaccalaureate certificate
Master's degree	Master's degree
Certificate of Advanced Study (Post-Masters degree)	Certificate of Advanced Study (Post-master's certificate) <i>(Combines current post-master's and first-professional certificates into one category.)</i>

Doctor's degree	<i>3 new Doctor's degree categories (programs moved from old Doctorate and First-professional) Doctor's degree – research/scholarship Doctor's degree – professional practice Doctor's degree - other</i>
First-professional degree	<i>Eliminated – programs move to either Masters or one of 3 new Doctorate</i>
First-professional certificate	<i>Eliminated – programs move to Certificate of Advanced Study</i>

The new degree categories will be defined as follows:

Doctor's degree - research/scholarship - A Ph.D. or other doctor's degree that requires advanced work beyond the master's level, including the preparation and defense of a dissertation based on original research, or the planning and execution of an original project demonstrating substantial artistic or scholarly achievement. Some examples of this type of degree may include Ed.D., D.M.A., D.B.A., D.Sc., D.A., or D.M, and others, as designated by the awarding institution.

Doctor's degree - professional practice - A doctor's degree that is conferred upon completion of a program providing the knowledge and skills for the recognition, credential, or license required for professional practice. The degree is awarded after a period of study such that the total time to the degree, including both pre-professional and professional preparation, equals at least six full-time equivalent academic years. Some of these degrees were formerly classified as "first-professional" and may include: Chiropractic (D.C. or D.C.M.); Dentistry (D.D.S. or D.M.D.); Law (L.L.B. or J.D.); Medicine (M.D.); Optometry (O.D.); Osteopathic Medicine (D.O); Pharmacy (Pharm.D.); Podiatry (D.P.M., Pod.D., D.P.); or, Veterinary Medicine (D.V.M.), and others, as designated by the awarding institution.

Doctor's degree - other - A doctor's degree that does not meet the definition of a doctor's degree - research/scholarship or a doctor's degree - professional practice.

Master's degree - An award that requires the successful completion of a program of study of generally one or two full-time equivalent academic years of work beyond the bachelor's degree. Some of these degrees, such as those in Theology (M.Div., M.H.L./Rav) that were formerly classified as "first-professional", may require more than two full-time equivalent academic years of work.

Implications on MHEC Systems

The first professional elimination will require changes to a number of data collection systems and surveys at the Commission. Changes to programs re-classified (moved) will be made to the Commission's academic program inventory and these degree re-classifications coordinated with both segment and institutional academic staff. The old program entries that have been re-classified will be marked with a status of "R" (meaning reclassified) and a discontinuance year of 09. In order to provide for historical information any program re-classified will be specially marked as reclassified and

therefore distinguishable from a discontinued program. The change will also require the re-listing of any old program in the Academic Program Inventory under the new degree level and having it specially marked. These programs will be identified with a status of “M” (program was moved to new degree classification). The approval year will be preserved for the program. No historical data prior to the 2009 collection year will be altered.

A summary of these impacts by institution sector shows the impact on the MAC surveys in the 2009 collection year.

Public institutions

New degree coding structure must be used for EIS and DIS as follows:

- Doctor’s degrees – use 3 new categories and new coding structure
 - First professional – not used, programs reported under new categories and codes for Doctor’s degrees
 - FPC – not used, programs reported as Certificates of Advanced Study
- HGS and TSS will not require any changes as degree coding is compatible with new

The EDS survey for publics will continue to allow reporting of the highest degree attained for faculty per current standards. Under this system the first-professional can be used to preserve historical reporting and the 3 new Doctorate categories are collapsed into a single Doctorate reporting code. The codes used are:

EDS highest degree attained field (faculty)

- 0 – not applicable (non-faculty)
- 1 - less than Bachelors
- 2 – Bachelors
- 3 – Post Baccalaureate Certificate
- 4 – Masters
- 5 – First –professional
- 6 – Certificate of Advanced Study
- 7 – Doctorate
- 8 – Other
- 9 – Unknown

Independent institutions

Surveys affected are the S-1, S-4, S-8, S-9, and D aggregate forms

New degree coding must be used for EIS and DIS

Both aggregate forms and unit records will follow use of new codes:

- Master’s degrees – used for all Masters Divinity, Theology or Rabbinical reported as Masters
- Doctor’s degrees – use 3 new categories and new coding structure
- First professional – not used, programs reported under new categories and codes
- FPC- n/a

HGS will not require any changes as degree coding is compatible.

The comparison for new versus old codes and their respective systems is shown in this table.

Degree Sought	OLD EIS	OLD DIS	TSS and HGS	NEW for all starting 2009
Unknown	00	00	00	00
Private Career School Diploma/Certificate	n/a	n/a	n/a	n/a
Lower Division Certificate	01	01	10	10
Associate	02	02	20	20
Upper Division Certificate	07	07	30	30
Bachelors	03	03	40	40
Non-Degree undergrad	10	n/a	47	47
Post-Baccalaureate Certificate	08	08	50	50
Masters	04	04	60	60
Certificate of Advance Study	12	09	70	70
Doctorate (OLD single category)	05	05	80	n/a
Doctorate (research and scholarship)	n/a	n/a	n/a	81
Doctorate (professional practice)	n/a	n/a	n/a	85
Doctorate (other)	n/a	n/a	n/a	86
Non-degree graduate	11	n/a	87	87
First-Professional	06	06	90	n/a
First-Professional Certificate	09	10	95	n/a
Non-degree first-professional	n/a	n/a	97	n/a
Multiple majors	n/a	99	99	99

Schedule

The federal schedule requires mandatory change over for 2009-2010 academic year (enrollment for fall 2009 and degrees awarded in 2010). The new reporting to the

Commission will be made starting in 2009 collection year for both the enrollment and degrees. The proposal would require program inventory changes at the Commission be identified by the spring 2009 to enable proper categorization and to establish a program level crosswalk for each institution affected.

2008 – The 2010 Workgroup finalize action plan to adopt federal first-professional changes

Winter 2009 – Commission release the new DIS and EIS specifications (coding changes for either 1 or 2 fields) and revised format of the aggregate submissions of S-1, S-4, S-8, S-9 and D reporting forms

Spring 2009 - work between academic staffs at Commission and institutions to identify program changes to Commission Academic Program Inventory, revised academic program inventory released

Spring and summer 2009 – institutions make changes to the reporting process that provides data to the Commission

Summer 2009 – Commission modify its systems to handle new coding for new degree categories, first-time flag for EIS and IPEDS 2009-2010 upload for data in the MAC 2009

Fall 2009 –S forms and D form submitted to Commission under the new 2009 coding changes. EIS and DIS data must be submitted using 2009 coding changes.

Fall 2009 – Degree data for AY2008-2009 reported to IPEDS with new degree categories

Spring 2010 – fall 2009 enrollment data reported to IPEDS under new degree levels

Section 5

Recommendations for Collection of Student Identification Numbers

5 Recommendations for the Collection of Student Identification Numbers

There is currently an interest by States developing the ability to track students longitudinally through their entire P-20 education experience and beyond into any life long education and employment. The development of this ability presents a number of challenges to higher education. These challenges include developing methodologies to link data from various sources especially P-12 and the costs to gather and maintain data necessary to track students. More than likely, **higher education will be forced to use a minimum of three identifiers for each student at every campus.** There is a need for a coordinated effort by higher education to work with the P-12 segment to effectively implement longitudinal tracking.

The public higher education segment has had this longitudinal tracking ability in Maryland since 1980 through systems operated by the Maryland Higher Education Commission (MHEC). More recently the ability to track public students longitudinally in the P-12 segment has been initiated by the Maryland State Department of Education (MSDE) with support from a large grant from the U.S. Department of Education. As these two segments develop their systems separately the issue of tracking across them becomes an important consideration. This issue focuses on the ability to track students by using a unique student identifier that is at least State specific. State specific tracking is the current direction being pushed by the federal government and numerous national organizations.

In Maryland, MSDE has begun implementation of the P-12 ID system. There are concerns with how this will affect the ability to link P-12 data to higher education data. Also how will higher education retrofit to this new scheme to establish linkage of student records for the whole P-20 arena? The information provided by MSDE indicates they are using this P-12 ID exclusively and not using social security number in their new system. Higher education has used SSN for tracking and longitudinal studies for almost 30 years. Loss of P-12 data identified by SSN means there may be problems to track across the P-12 to higher education interface. This current environment is forcing the issue onto higher education to address. This could take the form of attempting to expand the P-12 ID to a P-20 ID. While on the surface the P-20 does seem like a viable option, basing higher education systems and longitudinal studies on it creates a new set of issues and problems. More than likely, higher education will be forced to implement a minimum of three identifiers for each student at every campus. The following identifies the use of these three:

- **Social Security Number (SSN)** – One major use is to track students within higher education. SSN is also necessary for colleges to administer federal aid programs and track graduates into employment records. The continuing of the SSN as a single major identifier in higher education is not the ultimate solution. There have been many suits and laws that were related to using the SSN as the student ID number for day to day operations (student ID cards or as key to computer records). Some of these did relate to whether colleges could mandate collection of SSN as a requirement for admission (never been a policy in

Maryland). What most colleges did was to move away from SSN for administrative purposes to a non SSN based campus local ID. Colleges are still being faced with a slowly growing population for which they do not have SSNs due to students not wishing to provide it for enrollment or being unavailable for foreign students. There is definitely a push to move away from SSN and it is expected to continue. Any college must still collect and maintain SSN if they participate in federal student aid or they wish to track students into employment using state unemployment insurance (UI) data bases (only way unless using expensive follow-up surveys). MHEC and the colleges have used the UI many times in Maryland to perform employment studies. Currently the Maryland Workforce Investment Act program is dependant upon this technique to determine employment for accountability purposes.

- **Local Campus ID** – Most colleges have spent considerable effort over the past 7 years to move their own administrative systems from using SSN as a student id. Several laws were passed in Maryland which restricted the use of SSN (like on student ID cards). This move has been done in Maryland at public institutions under legislatively established deadlines. This effort required significant resources by the colleges to implement. Due to this effort, they are vested in their own local campus ID. Most colleges would not want to move to another system to meet their everyday administration needs. Of course these local campus IDs have no value in tracking students outside of one campus, in longitudinal studies for P-20 or for employment linkages.
- **P-12 ID** – This is the new ID being implemented by MSDE. It has limited value in higher education unless higher education takes on the burden of also collecting it and using it as a third ID. For higher education it has a major limitation of only existing for Maryland P-12 public students and does not cover private high school, out-of-state or foreign students. At this time, new ID is not required to be present on public high school transcripts which limit higher education access to it for students. If used as identification on transcripts by all the Local Education Authorities component of the new MSDE system, higher education would be able to address its capture through business process changes at institutions.

There are some other possibilities to do P-20 linkages and longitudinal tracking by:

- Develop other techniques that build upon matching a combination of data points like name, birth date and/or address. This technique has its own set of limitations in matching reliability and accuracy. In addition the MHEC systems do not capture the personal data to pursue these alternative approaches.
- Expand the P-12 identifier system to higher education and making it the Maryland Educational ID by expanding the MSDE system to establish a Maryland Educational ID (MEID). This ID would have to be obtained for any student entering higher education and not possessing one from Maryland P-12 participation. Adapting the P-12 ID to higher education may require modifications to it due to needs specific to higher education. One way to insure this would be legislation to require all students in Maryland be required to obtain and use one for enrollment in all Maryland educational institutions.

These possibilities still do not reduce the requirement for SSN for student financial aid or UI tracking. There is not a simple solution to resolve all needs for longitudinal studies besides using SSN. Any other solutions will represent multiple IDs and longitudinal data tradeoffs.

These are concerns on the implementation of the new MSDE system and relate only to the linkage between P-12 and higher education. These concerns were made to MSDE through discussions on a State Longitudinal Data System (SLDS) within the Accountability Workgroup of the Bohanon Commission in the fall 2008. The ability of the new MSDE system to interface with higher education requires future discussions between higher education and MSDE to establish both the needs and the mechanisms for the P-20 linkage and a SLDS. Additional information on the Bohanon Commission recommendations can be found at http://mlis.state.md.us/other/Funding_Higher_Ed/2008FinalReport.pdf .

The workgroup recommends that this issue be deferred for future study through SLDS initiatives in the State.

Appendices

Appendix A Race/Ethnicity Reference Links

IPEDS Race Ethnicity Resources webpage: <http://nces.ed.gov/ipeds/reic/resource.asp>

Association for Institutional Research webpage:
<http://www.airweb.org/raceethnicity.html>

Federal Register Education's Final Guidance on Maintaining, Collecting, and Reporting Racial and Ethnic Data:
<http://a257.g.akamaitech.net/7/257/2422/01jan20071800/edocket.access.gpo.gov/2007/pdf/E7-20613.pdf>

OMB Revision to Standards for the Classification of Federal Data on Race and Ethnicity:
<http://www.whitehouse.gov/omb/fedreg/1997standards.html>

National Center for Educational Statistics – Statistical Standards
http://nces.ed.gov/statprog/2002/std1_5.asp

OMB Provisional Guidance on Implementation of the 1997 Standards for Federal Data on Race and Ethnicity
<http://www.ofm.wa.gov/pop/race/omb.pdf>
http://www.whitehouse.gov/omb/inforeg/re_app_etable.pdf

U.S. Census Bureau Study of Responses to the Census200 Race Questions...
<http://www.amstat.org/sections/srms/proceedings/y2002/Files/USM2002-000535.pdf>

NCES – IPEDS Changes to implement the OMB 1997 Standards for Maintaining, Collecting and Presenting Federal Data on Race and Ethnicity
http://nces.ed.gov/IPEDS/news_room/ana_Changes_to_10_25_2007_169.asp

NCES – Proposed Changes to IPEDS forms for 2008-09 through 2010-2011 Updated 5/6/08
http://nces.ed.gov/IPEDS/news_room/twk_Proposed_Changes_01_30_2008_178.asp

National Forum on Education Statistics Managing an Identity Crisis: Forum Guide to Implementing New Federal Race and Ethnicity Categories (GOOD BRIDGING INFO APPENDIX)
<http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2008802>

Appendix B. Visa to Citizenship Reference from UM Peoplesoft System

Visa Codes

VISA_PERMIT_TBL

Country	Visa_Type	MHEC Racial Category	Description
USA	U-4	Non-Resident Alien	Dependent of U-1
USA	U-3	Non-Resident Alien	Minor Child of U-1
USA	U-2	Non-Resident Alien	Spouse of U-1
USA	U-1	Non-Resident Alien	Victim of Certain Crimes
USA	TPS	Non-Resident Alien	Temporary Protected Status
USA	TN	Non-Resident Alien	Trade NAFTA
USA	T-D	Non-Resident Alien	Dependent of TN Visa Holder
USA	RF	Resident	Refugee
USA	R-2	Non-Resident Alien	Dependent of R-1 Visa Holder
USA	R-1	Non-Resident Alien	Religious Worker
USA	Q	Non-Resident Alien	Partic n an Internl Cult Excha
USA	PR	Resident	Green Card
USA	PP	Resident	Permanent Residency Pending
USA	P-4	Non-Resident Alien	Dependents of P1, P2, P3
USA	P-3	Non-Resident Alien	Artis of Entert n Cult Uniq Pr
USA	P-2	Non-Resident Alien	Artist of Enter Under a Recip
USA	P-1	Non-Resident Alien	Internly Recog Athl or Enter G
USA	O-3	Non-Resident Alien	Dependent of O-1 and O-2 Visa
USA	O-2	Non-Resident Alien	Accompanying Personnel
USA	O-1	Non-Resident Alien	Person of Extraordina Ability
USA	NTR	Resident	Naturalized Citizen
USA	NAT	Non-Resident Alien	NATO Personnel
USA	M-2	Non-Resident Alien	Dependent of M-1 Visa Holder
USA	M-1	Non-Resident Alien	Vocational Student
USA	L-2	Non-Resident Alien	Dependent of L-1 Visa Holder
USA	L-1	Non-Resident Alien	Intracompany Transferee
USA	K-2	Non-Resident Alien	Dependent of K-1 visa holder
USA	K-1	Non-Resident Alien	Fiance of a US citizen
USA	J-2	Non-Resident Alien	Dependent of J-1 Visa Holder
USA	J-1	Non-Resident Alien	Exchange Visitor (Student)
USA	I	Non-Resident Alien	Rep of Foreign Info Media
USA	H2B	Non-Resident Alien	Skilled or Unskilled Worker
USA	H2A	Non-Resident Alien	Agricultural Worker
USA	H1B	Non-Resident Alien	Temp Wrkr in a Specialty Occup
USA	H1A	Non-Resident Alien	Registered Nurse
USA	H-4	Non-Resident Alien	Dependent of H Visa Holder
USA	H-3	Non-Resident Alien	Trainee
USA	G-5	Non-Resident Alien	Personal Employe of G-1 to G-4

USA	G-4	Non-Resident Alien	Dependents of G-3
USA	G-3	Non-Resident Alien	International organiz e.g UN
USA	G-1	Non-Resident Alien	Represent of International Org
USA	F-2	Non-Resident Alien	Dependent of F-1 Visa Holder
USA	F-1	Non-Resident Alien	Student
USA	E-2	Non-Resident Alien	Treaty Investor
USA	E-1	Non-Resident Alien	Treaty Trader
USA	D-1	Non-Resident Alien	Alien Crewman
USA	C-1	Non-Resident Alien	Aliens in Transit
USA	B-2	Non-Resident Alien	Visitor for Tourism
USA	B-1	Non-Resident Alien	Visitor for Business
USA	AY	Non-Resident Alien	Asylee
USA	AR1	Resident	Alien Registration
USA	A3	Non-Resident Alien	Employee Of Foreign Government
USA	A1-	Non-Resident Alien	Foreign Diplomatic Personnel
USA	A-2	Non-Resident Alien	Dependents of A-1/A-2
USA	A-1	Non-Resident Alien	Foreign Diplomatic Personnel
USA	O-2	Non-Resident Alien	Accompanying Personnel