



SHEEO

STATE HIGHER EDUCATION EXECUTIVE OFFICERS ASSOCIATION

COMMUNITIES OF PRACTICE:

INTEGRATING INDEPENDENT INSTITUTIONS IN POSTSECONDARY DATA SYSTEMS

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State postsecondary education data systems are vital information assets for policymakers, researchers, and the public. The Communities of Practice project (funded by the Bill & Melinda Gates Foundation) at the State Higher Education Executive Officers Association, builds upon SHEEO's ongoing efforts to measure the capacity and effective use of state postsecondary data systems, and provides states with opportunities to develop solutions to common issues with those systems. Since 2010, SHEEO has conducted periodic studies of the content, structure, and use of state postsecondary data systems through its *Strong Foundations* surveys and associated site visits and meetings.¹ The Communities of Practice project extends this work to provide professional development and technical assistance to state postsecondary policy analysts and researchers. Beginning in fall 2017, SHEEO will hold a series of Communities of Practice convenings. Each of these events will bring together teams from multiple states and launch an ongoing network for Community of Practice members to share information, analyze solutions, and provide assistance to practitioners in other states. In conjunction with each Community of Practice convening, SHEEO will release a white paper highlighting key themes and findings for the topic of focus.

The second Community of Practice convening, "Integrating Independent Institutions in Postsecondary Data Systems," was held in Denver, Colorado, in March 2018. The two-day meeting included participants from nine states—Colorado, Connecticut, Kentucky, Massachusetts, Minnesota, North Carolina, Rhode Island, Tennessee, and Texas. These states represent a range of relationships between independent institutions and state data systems, from states with long-standing voluntary reporting relationships to those with no existing reporting relationship. This white paper highlights opportunities—such as improved access to student outcomes and demonstrating the value of independent institutions—and challenges—such as privacy and cost concerns—associated with integrating independent institutions into state postsecondary data systems. The paper also includes four state-level case studies, outlining how Connecticut, Georgia, Kentucky and Minnesota developed methods for integrating these institutions in their state data systems.

1. For a summary of results from the most recent Strong Foundations study, see John Armstrong and Christina Whitfield, "The State of State Postsecondary Data Systems: Strong Foundations 2016," SHEEO, May 2016. Retrieved from: http://www.sheeo.org/sites/default/files/publications/SHEEO_StrongFoundations2016_FINAL.pdf

THE DEVELOPMENT AND BENEFITS OF STATE DATA SYSTEMS

Over the last few decades, demand for high-quality student data—among policymakers, state higher education agencies, and students—to answer complex questions has increased. Since the 1970s, states have been developing postsecondary student unit record systems (PSURS). Many of these state data systems were originally designed to track enrollment indicators but have evolved over time as policy demands and student behavior have changed.² PSURS are now “the primary means for states to collect data and analyze student progress, completions, and outcomes.”³ Access to these data is becoming increasingly important as improving educational attainment is now a cornerstone of many higher education policy discussions. According to Lumina Foundation, 41 states have established a statewide educational attainment goal.⁴ As students increasingly take nonlinear pathways to completion, states are relying on robust postsecondary student unit record systems to help identify and evaluate policy interventions designed to achieve these goals.

The utility of PSURS has been enhanced by the ability to link data with information collected by other state agencies including the K-12 and workforce sectors. These linkages, when matched by a common identifier, can provide longitudinal information about transitions between K-12 education, postsecondary education and the workforce, and help states evaluate programs and policies. Given the growing attention policymakers are placing on student success, the utility of longitudinal data systems has been magnified. A growing number of states have leveraged federal grants to develop longitudinal linkages with postsecondary data systems and K-12 and workforce data. Forty-seven states have received a State Longitudinal Data System (SLDS) grant from the federal government.⁵

Robust state postsecondary student unit record systems linked with other state agency data provide many benefits, including a better understanding of trends in the P-20W arena. For example, state PSURS provide the ability to analyze student enrollment and migration patterns, factors and policies that improve student success, and data on student earnings after graduation. Data from these systems are used by policymakers, academic researchers, and as consumer information for students and families. In addition, members of the media, policy think tanks, and advocacy groups regularly use data from PSURS to inform their work.⁶

2. Armstrong, John, and Katie Zaback. “Assessing and Improving State Postsecondary Data Systems.” *Institute for Higher Education Policy*, May 2016.

3. Armstrong and Whitfield, “The State of State Postsecondary Data Systems.”

4. Lumina Foundation, “Statewide Educational Attainment Goals: A Case Study,” 2017. Retrieved from: <https://www.luminafoundation.org/files/resources/01-statewide-attainment-goals.pdf>

5. National Center for Education Statistics, “Grantee States,” 2017. Retrieved from: <https://nces.ed.gov/programs/slds/stateinfo.asp>

6. See Dustin Weeden and Christina Whitfield, “Communities of Practice: Improving Access to State Postsecondary Data Systems.” SHEEO, January 2018.

INDEPENDENT COLLEGES' PARTICIPATION IN STATE PSURS

While attention has been paid to the development and utility of state PSURS, less attention has been paid to the limitation that many of these systems only include public institutions. Although there is variation between states, approximately 20 percent of undergraduate and graduate students in the U.S. enroll at independent colleges and universities,⁷ and approximately 27 percent of associate, bachelor's, and graduate degree earners graduated from independent institutions.⁸ Consequently, the data and analyses from state PSURS that do not include independent institutions fail to provide a complete picture of the higher education sector. As state PSURS become more integrated into the policymaking and evaluation process, it will be increasingly important for states to work with their independent colleges and the state associations representing the interests of those colleges to create an environment that allows for and encourages participation in state PSURS.⁹

In the 2016 iteration of the *Strong Foundations* survey, 18 states indicated they had integrated independent colleges and universities into their state postsecondary data systems.¹⁰ In some states, participation is mandated by statute or regulation. In Maryland for instance, state regulations require all approved higher education institutions—including independent colleges and universities—to submit an annual report.¹¹ The Maryland Higher Education Commission uses the information provided by higher education institutions to produce reports that include data elements such as enrollment by race/ethnicity, gender, and distance education status, degrees awarded, and state aid (for the institutions that receive direct support from the state).¹² Independent colleges and universities are required to submit data on all students, not just students receiving state financial aid. As a result, the Maryland Higher Education Commission's annual data report is more comprehensive than in other states where reporting is limited to students receiving financial aid.

Other states, including Arkansas, Colorado, Indiana, Minnesota, Texas, Virginia, and Washington, statutorily require independent colleges and universities whose students receive state financial aid to participate in state student unit record data system collections. In Washington, each institution that participates in the state need-based grant program must submit data on students receiving aid awards. The Washington Student Achievement Council has statutory authority¹³ to collect data as part of an ongoing analysis of financial aid, and uses a Unit Record Report to fulfill this statutory requirement. Because the statute authorizing data collection is linked to the analysis of financial aid, only students receiving financial aid are reported by independent institutions. The Washington Student Achievement Council has developed data-sharing agreements to allow Unit Record Report data to be shared with a P-20W warehouse that is operated by the Office of Financial Management. Data collected from independent institutions in the state are not shared with the P-20W warehouse unless the institutions specifically provide consent.¹⁴

7. National Center for Education Statistics, "Table 303.10. Total fall enrollment in degree-granting postsecondary institutions, by attendance status, sex of student, and control of institution: Selected years, 1947 through 2026," *Digest of Education Statistics*, 2016. Retrieved from: https://nces.ed.gov/programs/digest/d16/tables/dt16_303.10.asp?current=yes
8. National Center for Education Statistics, "Table 318.50. Degrees conferred by postsecondary institutions, by control of institution, level of degree, and field of study: 2014-15," *Digest of Education Statistics*, 2016. Retrieved from: https://nces.ed.gov/programs/digest/d16/tables/dt16_318.50.asp?current=yes
9. Armstrong and Whitfield, "The State of State Postsecondary Data Systems."
10. Ibid.
11. COMAR 13B.01.01.06 <http://www.dsd.state.md.us/comar/comarhtml/13b/13b.01.01.06.htm>
12. Maryland Higher Education Commission, "2017 Data Book," 2017. Retrieved from: <http://www.mhec.state.md.us/publications/Documents/Research/AnnualPublications/2017DataBook.pdf>
13. RCW 28B.92.050
14. Washington Student Achievement Council, "The Unit Record Report Manual 2016-17 Academic Year," 2017. Retrieved from <http://www.wsac.wa.gov/sites/default/files/09-13-2017%20-%20Final%202016-17.URRmanual.pdf>

Most statutory and regulatory provisions say little about whether the state or institution is responsible for the costs of providing data. Colorado is an exception and places the responsibility solely on independent institutions. Colorado operates a unique voucher-like approach for allocating a portion of state appropriations known as the College Opportunity Fund. Independent colleges and universities are eligible to participate and receive state funding through this fund; however, to be eligible for the public funding, independent institutions must enter performance contracts and participate in the student unit record system. Colorado statute specifically states, “the participating private institution of higher education shall reimburse the department for the actual expenses associated with including the institution in the student unit reporting data system.”¹⁵

Beyond the statutory and regulatory mandates, independent colleges in several states participate in PSURS on a purely voluntary basis. In states like Kentucky, these relationships are long-standing and have proven to be mutually beneficial by providing the state with a more complete understanding of its higher education sector. In other states such as Connecticut and Georgia, these relationships are recent developments. In Florida and Kentucky, all independent colleges participate, while in other states only a portion provide data to the state PSURS. In Alabama, for example, only about half of the Alabama Association of Independent Colleges and Universities members participate in the PSURS data collection.¹⁶ The Connecticut, Georgia, and Kentucky case studies discussed below provide a deeper analysis of how the voluntary relationships in these states function, and highlight the intermediary role independent college associations can serve.

OPPORTUNITIES FOR INDEPENDENT COLLEGES TO PARTICIPATE IN PSURS

The willingness of independent colleges and universities to voluntarily participate in state data systems suggests that the institutions and the state benefit from these arrangements. As increasing educational attainment becomes a social and economic imperative, states, independent colleges, and their state associations are increasingly aware of the benefits of participating in state postsecondary data systems. These opportunities include:

INFORMED DECISION-MAKING OPPORTUNITIES

By participating in the state PSURS, independent colleges can engage in data-informed decision-making which can allow them to gain a deeper understanding of the preparation students have had on their paths to college, what kinds of initiatives make a difference in outcomes, and see what their students do once they leave college. Institutions can better understand how students “swirl” (a nonlinear pathway which involves students stopping out of or transferring between institutions), and what labor-force outcomes await their graduates. Both the state and the institution benefit from shared access to key information about student mobility between sectors when independent colleges participate in the state PSURS. States gain a more complete picture of student movement from high school into the postsecondary sector as well as a better understanding of the success of students who begin at community colleges and transfer to four-year institutions. This information can aid the evaluation of policies designed to encourage access to and success in postsecondary education.

15. C.R.S. 23-18-201(2)

16. Alabama Commission on Higher Education, “Institutional Student Profiles: Fall 2016.” Retrieved from: <http://ache.alabama.gov/Content/Profiles/2016-Profiles/2016-Profiles.pdf>

POLICY OPPORTUNITIES

While participation in state PSURS provides an institution with an abundance of information to support informed decision-making, the independent colleges in the state may also gain a seat at the higher education policy table. Independent colleges can also use the state-level data and comparisons to leverage grant funding for strategically important initiatives, and demonstrate success beyond graduation rates. Additionally, if policymakers see data highlighting the added value and success of independent colleges, they will be more likely to view these institutions as viable partners that can help solve the higher education challenges facing the state. Institutions also gain a better sense of what is happening with state legislatures and higher education policy development, and can provide input in the policymaking process.

WORKFORCE OPPORTUNITIES

Independent colleges and universities make significant contributions to state economies, and participating in the state PSURS allows independent institutions to demonstrate the value they provide. For example, many independent colleges recruit geographically diverse students who subsequently remain in the state after graduation. Thus, these colleges may bring in many out-of-state students at no cost to the state, and then upon graduation provide the state with educated taxpayers. Providing state policymakers with a more complete understanding of the supply of residents with postsecondary degrees can help economic development efforts intended to attract new employers. In the fall of 2017 when states were developing proposals for the site of Amazon's second headquarters, several states relied on data from independent colleges to demonstrate a highly educated labor supply—which was one of Amazon's criteria for selecting a location.¹⁷ The ability to access graduates' wage data also helps institutions make decisions related to curriculum adjustments and improving career services.

CHALLENGES FACING INDEPENDENT COLLEGES' PARTICIPATION IN PSURS

Regardless of sector, resources such as staff capacity (both number of staff and skill levels of staff), sustainability, time constraints, information technology capacity, concerns about data breaches and data quality, and financial resources are frequent barriers to participation in state data systems. Additionally, there are continued concerns regarding interpretation of the Federal Educational Rights and Privacy Act (FERPA), data governance, and often a lack of memoranda of understanding/agreement. However, the barriers facing independent college participation in state data systems may be more unique because their participation is often voluntary (and if not completely voluntary, some of the elements may be). This section highlights some of these challenges, but is not exhaustive. It is important to remember that while these challenges exist, and for many colleges may seem insurmountable, opportunities are also prominent as discussed above.

17. Amazon HQ2 RFP Retrieved from https://images-na.ssl-images-amazon.com/images/G/01/Anything/test/images/usa/RFP_3_V516043504_.pdf

LEGAL

In some instances, independent colleges face unique legal hurdles that must be overcome to participate in the state data system. Interpretation of FERPA, the Higher Education Act of 1965 (HEA), and state statutes governing the data sharing can create barriers for participation. Independent institutions may pass their data through a state association, which in turn passes the information to the state. In these instances, there seems to be some confusion about whether this violates applicable laws governing student privacy. Additionally, independent colleges may be concerned about liability from lawsuits should a data breach occur while the data are in transit or at rest. Particularly, independent institutions are concerned that they are more likely to face litigation—and may not be indemnified—in the event of a data breach when compared to state entities. To address this issue, many states are exploring legislation (such as SB 405 in Georgia, as discussed in the case study below), which may indemnify the college or state association in the event of a breach. An additional cause for concern pertains to who can access the data and how it can be used. Specific memoranda of understanding/agreement need to be agreed upon in advance to allay these concerns. These agreements should detail which entity houses the data, who the data stewards are, and how the data will be disposed of. All interested parties can benefit from clearly defining expectations and addressing data governance at the outset.

CAPACITY

Many independent colleges face capacity constraints that may limit or prevent participation in the state PSURS. Specifically, independent colleges and their associations are less likely to receive funds to build and maintain systems compared to their public counterparts. Independent colleges may have limited data capacity and may not be able to allocate sufficient staff time for state data collections without assistance. While institutions in the public sector may share a common student information system (SIS), independent colleges more often run a wide spectrum of SISs, including some that are homegrown. This variation makes script writing and troubleshooting difficult, and can create additional demands on limited research staff. Similarly, constrained reporting capacity may make it difficult for independent institutions to respond to changing reporting requirements or increased requests for information. States seeking to integrate independent institutions in their state data systems should consider innovative approaches to support reporting capacity in the independent sector.

PRIVACY

Data privacy concerns can also be a significant hurdle for independent colleges. Institutions may be hesitant to submit data to the state system if they have concerns regarding data security and data governance. This can be a primary concern in instances where sectors have no history of data sharing or past friction exists. With many large American businesses falling victim to data breaches recently, there is heightened sensitivity about exposing student data to additional risk by sharing it with others. Additionally, independent colleges are concerned that their student data will become subject to open records requests, from which private colleges are typically exempt. States seeking to include independent institutions in their PSURS can facilitate the process by clarifying issues regarding data security, governance, and access.

STATE CASE STUDIES

The following case studies describe four successful models for integrating independent institutions in state data systems:

CASE STUDY: CONNECTICUT

Connecticut (*Voluntary, Federated, Subset of Data Elements, Direct to Association*)

Independent colleges and universities in Connecticut participate in the Connecticut Preschool through 20 and Workforce Information Network (P20 WIN). P20 WIN links data between education and workforce agencies in the state, but is not a data warehouse. Each participating agency retains control and management of its own data. In this federated model, participating agencies executed memoranda of agreement (MOAs) that guide the sharing of data between the agencies.

Development of P20 WIN began in 2009 with an SLDS grant from the U.S. Department of Education to fund a project to attain “interoperability” between the Connecticut State Department of Education’s K-12 Public School Information System and postsecondary and workforce data systems for research, evaluation, management and policy development purposes. Connecticut’s grant application recognized that a significant number of Connecticut residents enroll in an independent college in-state and, without access to data on these students, the state would have an incomplete picture on student progression and success. In the fall of 2012, the Connecticut Conference of Independent Colleges (CCIC) Board of Directors unanimously voted to authorize CCIC’s research arm, the Connecticut Independent College & University Institute for Research & Public Service (“cicu-IRPS”) to begin work on an independent college student data warehouse that would have the capacity to share data with P20 WIN.

For much of 2013, discussions with independent colleges in the state took place on best practices and data elements to provide to the state, along with a search for grant opportunities to fund the development of the data warehouse at cicu-IRPS. CCIC also engaged in dialogue with the P20 WIN team and the state’s attorney general about its participation. CCIC/cicu-IRPS became an official participating agency of P20 WIN in October 2014.

CCIC procured a grant in 2013 to support the launch of the project. This grant supported the purchase of software and hardware as well as the retention of a consultant to complete development of an extensive data dictionary and to manage the development and administration of the data system itself. CCIC secured a second grant in 2014 that allowed it to conduct a pilot test with a subset of member institutions. An extensive memorandum of understanding granting cicu-IRPS and its member institutions the authority to share data was developed and eventually

signed by 13 of 15 cicu-IRPS eligible member institutions. To date, data have been received from 11 of the 13 participating institutions. In spring 2018, eight institutions will receive wage and earnings data back from the Connecticut Department of Labor. They also anticipate receiving out-of-state labor information through Connecticut's participation in WRIS 2.¹⁸

The participating agencies of P20 WIN presently include: the Connecticut State Department of Education (CSDE), the Connecticut State Colleges and Universities (CSCU), the University of Connecticut (UConn), the Connecticut Department of Labor (DOL), the Connecticut Office of Early Childhood (OEC), and the Connecticut Conference of Independent Colleges (CCIC). Under the P20 WIN Data Governance Policy, three bodies share P20 WIN system leadership responsibilities: the Executive Board, the Data Governing Board, and the Data Steward Committee. Collectively, they provide policy creation and system implementation, maintenance, and improvement.¹⁹

18. WRIS stands for the "Wage Record Interchange System 2" within the U.S. Department of Labor.

19. Connecticut State Colleges and Universities P20 WIN, "Governance." Retrieved from: <http://www.ct.edu/p20win/about#governance>

CASE STUDY: GEORGIA

Georgia (Voluntary, Centralized, Nearly All Data Elements, Direct to Association)

Independent colleges and universities in Georgia participate in the state data system Georgia's Academic and Workforce Analysis and Research Data System (GA-AWARDS). GA-AWARDS is a Pre-K through workforce (P20W) system, and includes data from a number of agencies, including Bright from the Start: Department of Early Care & Learning, Georgia Department of Education, State Charter Schools Commission, Georgia Student Finance Commission, University System of Georgia, Technical College System of Georgia, Georgia Independent College Association (GICA), Georgia Professional Standards Commission, Georgia Department of Labor, and the Governor's Office of Student Achievement (GOSA).

GA-AWARDS is housed within GOSA and is governed by the Alliance of Education Agency Heads (AEAH) Data Management Committee. Data from the system is used to create aggregate-level report cards and dashboards. An Executive Research Committee—which functions much like an institutional review board—was created to allow researchers from participating institutions and agencies to apply for individual-level data for research purposes.²⁰

Georgia was awarded an \$8.9 million SLDS grant in 2009. These funds were to be used to “establish a new infrastructure that manages the exchange, integration, analysis, and reporting of educational data for the State of Georgia. A P-20 data model will be designed to track student data longitudinally and integrate information about teachers, courses, programs, schools and systems to provide better understanding of the influences on and context for student achievement.”²¹ The following year, Georgia was awarded nearly \$400 million in Race to the Top funding to integrate the two grants to extend and improve the existing SLDS, which led to the development of GA-AWARDS.

While the independent colleges in the state were not named recipients of the SLDS grant funds, GICA began discussions with the Governor's Office of Student Achievement to examine whether the independent colleges in the state might participate. During the initial stages of the project, GICA helped shape the research questions, elements collected, and rules regarding use of data. The GICA board passed a unanimous vote for GICA to begin participation in GA-AWARDS. Unlike Connecticut, Georgia independent colleges were not recipients of a grant to help fund their endeavors; however, the state worked with the association to provide resources and personnel to make participation possible.

GICA's chief concerns regarding participation in the system were the availability of data to third parties, data security, and indemnity of the association and their institutions in the instance of a data breach at the state level. To address these concerns, GICA was a part of the development of the data request process for

20. More information about this process can be found at:
<https://gosa.georgia.gov/statewide-longitudinal-data-system-ga%E2%80%A2awards>

21. Georgia Department of Education 2009 SLDS Grant Project Abstract: <http://nces.ed.gov/programs/slds/pdf/2009georgiaabstract.pdf>.
2 Georgia Department of Education Phase

approved affiliated researchers, and sits on the committee to review these requests. Additionally, the association ensures that the data is encrypted both at rest and in transition between institutions, the association, and the state. In response to concerns about liability, Georgia passed Senate Bill 405 in 2012. This legislation states that “a private college that submits confidential student data and records to the Department of Education shall not be liable for the breach of the confidentiality of such data and records by the Department of Education.”²² Additionally, the association purchased data breach insurance.

Currently, 19 of GICA’s 24 independent college members provide data for GA-AWARDS. The process involves institutions submitting data directly to GICA, which works to ensure the data are reliable. Once this process is complete, GICA supplies the data to GOSA, which matches, consolidates, and links the data provided by various partners. Variables such as first and last names and state-assigned unique student identifiers are used to link student records. The data system then de-identifies this linked data to ensure that no student’s personally identifiable information is contained within the data set. The de-identified student level data is made available to designated researchers from partner agencies and institutions for research purposes as stated above. The system is fully operational, with GICA receiving necessary data for research and an active applicant portal for data requests.

22. Georgia General Assembly (2012). Senate Bill 405. Retrieved from: <http://www.legis.ga.gov/Legislation/en-US/display/20112012/SB/405>

CASE STUDY: KENTUCKY

Kentucky (Voluntary, Centralized, Most Data Elements, Direct to State)

Independent colleges in Kentucky have been voluntarily supplying data to the Council on Postsecondary Education (CPE), the state SHEEO organization, since the 1980s and have participated in CPE's Kentucky Postsecondary Education Data System (KPEDS) since its inception. In Kentucky, independent college institutions submit their data directly to the state without going through an intermediary such as their state association, the Association of Independent Kentucky Colleges and Universities (AIKCU). Currently, independent colleges and universities provide data that includes personally identifiable information. However, these campuses do not report some elements that public institutions in the state are required to report (such as student coursework and first-year grades, ACT scores, and institutional financial aid). Data is validated and stored in the CPE KPEDS warehouse.

Independent Kentucky colleges meet with the CPE regularly, facilitated by AIKCU meetings of institutional researchers. Data collection procedures and proposed changes to data elements are vetted before changes are finalized. Annually, the CPE collection 'guidelines' manual is published, one volume for the independent colleges and one for the public institutions.²³ From the unit-level data collected, reports are presented by AIKCU and CPE regarding enrollment, degrees conferred and other state-level metrics which support the Kentucky attainment goal, 60 percent by 2030. The AIKCU president presents annually to the Council regarding the metrics which evaluate the state of the Kentucky independent colleges and their role in the Kentucky postsecondary education and workforce development.

As part of the CPE KPEDS system, Kentucky independent colleges participate in the State Data System KY Center for Education and Workforce Statistics (KCEWS). As the state SLDS, KCEWS was created in 2012 to expand upon the P-20 Data Collaborative already in place. KCEWS collects and links data to assess education and workforce outcomes. The CPE delivers unit-level data to KCEWS multiple times per year, determined by an agreed upon schedule based on data availability and the KPEDS storage procedures used to ensure integrity and data security. KCEWS is governed by the leadership of the main agencies that provide data: K-12 Department of Education, Education Professional Standards Board, Kentucky Council on Postsecondary Education, Kentucky Higher Education Assistance Authority, and the Kentucky Education and Workforce Development Cabinet. Currently, each agency maintains control over their own database systems, so no agency has direct access to another's data until after it goes through KCEWS and each student record is given a unique identifier that protects the person's and institution's information.

23. See <http://cpe.ky.gov/policies/data/2017-18guidelines-independent.pdf>

CASE STUDY: MINNESOTA

Minnesota (Voluntary, Centralized, All Data Elements, Direct to State)

Minnesota higher education institutions, public and private, have long submitted enrollment and completion data to the Minnesota Office of Higher Education. Though this data submission is voluntary, it is required to participate in state financial aid programs. Minnesota independent and proprietary colleges and universities technically volunteer to participate in the Minnesota Statewide Longitudinal Education Data System (SLEDS), but if they did not, they would not have access to state financial aid programs. The data that institutions have been submitting are now used in the SLEDS system and thus development of the SLEDS system did not create additional reporting requirements for institutions. Developed in 2009, the Minnesota SLEDS is governed by the Minnesota P-20 Education Partnership and is managed jointly by the Minnesota Office of Higher Education (OHE), Minnesota Department of Education (MDE), and Minnesota Department of Employment and Economic Development (DEED). This system links data provided by K-12 and higher education institutions (enrollment, completion, ACT score, major, etc.) with National Student Clearinghouse data and earnings data from the DEED.

OHE produces reports using these data, and has developed a website where the public can access aggregate statistics on K-12, college, and graduate employment outcomes by district, sector, or institution.²⁴ Minnesota's SLEDS webpage describes in detail how data is safeguarded, what data is collected, how the system shares data and what federal and state laws govern data protection and sharing. According to the site, "data may only be shared for purposes authorized in federal and state law and requires the requester apply for access using the process approved by the SLEDS Governance Committee. While personal information is used to link records outside of SLEDS, personal information is removed before the data are placed into SLEDS—de-identifying the data within the SLEDS system."²⁵

Independent colleges send data directly to OHE. While the SLEDS was established in 2009, the agreement retroactively allowed for enrollment data from 2003 forward and degree data from 2007 forward. The Minnesota Private College Council (MPCC) colleges have data-sharing agreements in place with the state which are renewed every five years. Institutions can access their de-identified enhanced data (the data on their students plus K-12 and workforce data). If colleges want identifiable data they must go through the SLEDS data request process and explain the necessity of the request. Researchers may also use the request process, but are not allowed to identify institutions by name without their permission. The MPCC facilitates the relationship between individual institutions and the state. In addition to the data that colleges receive directly, MPCC has benefited from this endeavor; the Council recently had a data request approved which will provide de-identified data on all students that have been enrolled in MPCC schools since fall 2007, enhanced with fields provided by other state entities. MPCC will receive

24. Minnesota Statewide Longitudinal Education Data System. Retrieved from: <http://sleds.mn.gov>

25. Minnesota Statewide Longitudinal Education Data System, "Privacy." Retrieved from: <http://sleds.mn.gov/#privacy>

additional fields from K-12, employment, and the National Student Clearinghouse data to answer questions about graduate outcomes and how those outcomes vary by ethnicity, free and reduced lunch, and outcomes for students who transferred out of MPCC institutions. Participation in the state SLEDS will allow independent institutions to advocate more fully for their institutions and sector.

OPPORTUNITIES FOR THE COMMUNITY OF PRACTICE

Based on survey responses of independent college associations, and conversations at the Community of Practice convening, states wishing to integrate independent colleges in their PSURS should consider the following:

- **Identify innovative methods to support independent colleges**

Given the lack of financial support for developing longitudinal data systems within the independent sector, and often limited staff analytical capacity within independent institutions, states will need to find innovative ways to provide support for participation. States may want to consider lending personnel with reporting expertise to assist with system troubleshooting, model building and coding. Additionally, states with software purchasing agreements may consider sharing their technology access at a reduced cost. Members of the Community of Practice can work together to identify additional ways in which states can support the growth of PSURS and inclusion of independent colleges.

- **Clearly define expectations**

Given the concern that independent colleges have over what the expectations may be, states should develop detailed memoranda of understanding/ agreement and data-sharing agreements that outline what data is being collected, how the data will be securely maintained, how the data can be used and for what purpose, and how data will be disposed of. States should be open about what elements are being collected and any anticipated changes. Independent colleges and their associations should be included during the planning phase if possible to provide input on the process.

- **Address issues of data governance**

While each state has a unique data governance structure, Members of the Community can learn from peers with well-defined data governance structures that integrate independent colleges. Examples and assistance from these states can be of great value to states struggling with data governance challenges.

- **Cultivate relationships among state independent colleges and between sectors within a state**

SHEEO agencies and independent college associations can take leadership roles in cultivating relationships among the multiple actors involved in data-sharing arrangements. Articulating the benefits of integrating independent colleges and providing fora to discuss and address concerns—using examples from other Members of the Community—could help improve the coverage and utility of state postsecondary data systems.

APPENDIX A: COMMUNITY OF PRACTICE PARTICIPANTS

CONNECTICUT TEAM

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APPENDIX B: RESULTS OF INDEPENDENT COLLEGES AND UNIVERSITIES PARTICIPATION SURVEY

State	Does the State Have an SLDS System In Place?	Do Independent Colleges Participate in the SLDS?	Reason Independent Colleges Participate in the SLDS	Relationship Between the SLDS and SHEEO Agency	Length of Time Independent Colleges Have Been Submitting Data
California	No	No	-	-	-
Connecticut	Yes	Yes	Participation voluntary	Federated Model	2016
Florida	Yes	Yes	Participation voluntary	Centralized - Florida does not have a coordinating board, but the SLDS is housed at the state department of education.	Early 2000s
Georgia	Yes	Yes	Participation voluntary	Centralized	2008
Indiana	Yes	Yes	Limited participation for financial aid eligibility	Centralized - the SHEEO student unit record system functions as the SLDS	2013
Kentucky	Yes	Yes	Participation voluntary	Centralized - the SHEEO student unit record system submits data to the SLDS	Data has been submitted to the SHEEO agency since the 1980s and to the SLDS as long as it has been in existence
Maryland	Yes	Yes	Required by law	Centralized - The SHEEO student unit record system submits data to the SLDS	15 Years
Massachusetts	Yes	No	No participation; but interested in future discussions		
Minnesota	Yes	Yes	Participation tied to state financial aid	The SHEEO student unit record system functions as the SLDS	SLEDS started in 2009 and agreement retroactively included enrollment data from 2003 onwards that colleges submitted to the Minnesota Office of Higher Education
New York	Yes	No	Not required to participate	Maintained by NYSED Office of Information and Reporting Services.	-
North Carolina	Yes - the SLDS will be active as soon as administrative rules and an MOU for operations are completed	Yes, once rules and an MOU are completed	Participation will be voluntary once active. Institutions participated in the grant and development of the system as full partners	North Carolina does not have a coordinating board so each sector houses its information separately. A "broker" through SAS software links the information requested from each sector.	-

Name of Data System	Was the State a Federal SLDS Grant Recipient?	Submission Practice	Data Provided
-	-	-	-
Preschool through Twenty and Workforce Information Network	Yes	Institutions submit data to the association which then submits the data to the state.	Institutions provide a subset of the data requested (individual-level data).
PK-20 Education Data Warehouse	Yes	Institutions submit data directly to the state.	Institutions provide all data requested - excluding personally identifiable information such as name, address, etc.
Georgia's Academic and Workforce Analysis and Research Data System	Yes	Institutions submit data to the association which then submits the data to the state.	Institutions provide all data requested - including personally identifiable information such as name, address, etc. (often for matching purposes and later discarded)
Indiana Network of Knowledge	Yes	Institutions submit data to the association which then submits the data to the state.	Institutions provide all data requested - including personally identifiable information such as name, address, etc. (often for matching purposes and later discarded)
Kentucky Longitudinal Data System	Yes	Institutions submit data directly to the state.	Institution provide all data requested (which includes personally ID information). Institutions do not report some elements that publics are required to report (such as first year grades, ACT scores, inst. financial aid).
Maryland Longitudinal Data System	Yes	Institutions submit data directly to the state.	Institutions provide all data requested - including personally identifiable information such as name, address, etc. (often for matching purposes and later discarded)
-	Yes	Institutions submit data directly to the state.	Institutions provide all data requested - including personally identifiable information such as name, address, etc. (often for matching purposes and later discarded). *Not all elements are mandatory
-	-	-	-
-	-	Institutions will submit data to the association which then will submit the data to the state.	Institutions have agreed to provide certain data points. The system is based on a unique identifier already in use by k-12 so no personally identifiable data will be provided.

State	Does the State Have an SLDS System In Place?	Do Independent Colleges Participate in the SLDS?	Reason Independent Colleges Participate in the SLDS	Relationship Between the SLDS and SHEEO Agency	Length of Time Independent Colleges Have Been Submitting Data
Ohio	The state received SLDS grant funds, but does not currently have a functioning P-20 database	No	No participation, have not been asked	The K-12 agency received funds for an SLDS through the Race to the Top program, but there is no P-20 connection, and no movement toward incorporating data from any higher education institution--public or private--or the SHEEO agency's unit-record database of public-campus students	-
Pennsylvania	Yes	No	No Participation - by choice	-	-
Rhode Island	Yes	No	No participation; state has limited system development funds to public schools only; to date private institutions have expressed a desire not to participate	The SHEEO student unit record system submits data to the SLDS	-
Tennessee	Yes	Yes	Individual campuses voluntarily choose to participate - about 2/3 of the independent college association's membership participates	The association submits data to the SHEEO agency for analysis of state financial aid programs; however, the SHEEO agency does not submit independent college data to the SLDS. Individual campuses choose whether to participate in the SLDS, but by accepting state financial aid institutions are required to submit data on aid recipients to the SHEEO agency. The association serves as the reporting agency in both cases.	Participation in the SLDS began in August 2014, but includes data back to 2005.
Texas	Yes	Yes	Limited participation for financial aid eligibility and enrollment/graduation rate data.	The SHEEO student unit record system functions as the SLDS	2001
Washington	Yes	Yes	Limited participation for financial aid eligibility	The SHEEO student unit record system submits data to the SLDS	As long as the SLDS has been in existence
Wisconsin	Yes	Yes (some)	Participation voluntary	-	2010

Name of Data System	Was the State a Federal SLDS Grant Recipient?	Submission Practice	Data Provided
Ohio Longitudinal Data Archive	Yes	-	-
-	Yes	-	-
-	-	-	-
P20 Connect TN	Yes	Institutions submit data to the association which then submits the data to the state.	Institutions provide all data requested - including personally identifiable information such as name, address, etc. (often for matching purposes and later discarded)
Texas Public Education Information Resource	Yes	Institutions submit data directly to the state.	Institutions provide a subset of the data requested (individual-level data).
Washington P-20W Statewide Longitudinal Data System	Yes	Institutions submit data directly to the state.	Institutions provide all data requested - including personally identifiable information such as name, address, etc. (often for matching purposes and later discarded)
-	-	Institutions submit data to the association which administers and holds the data in a secure database subject to research requests to access the information	Institutions provide all data requested - including personally identifiable information such as name, address, etc. (often for matching purposes and later discarded)

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