NC-SARA Enrollment Data Reporting Guide

National Council for
State Authorization Reciprocity Agreements
A voluntary, regional approach to state oversight of distance education

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Introduction:

This *Spring 2018 Enrollment Data Reporting Guide (Guide)* provides guidance to SARA-participating institutions about how to submit institutional enrollment data to NC-SARA. *Please read the entire Guide before submitting your data or asking questions*. While every effort has been made to provide clear instructions, the variety of institutional practices in determining student location, tabulating enrollments, and delivering distance education make a perfectly accurate and consistent reporting across institutions unattainable at present.

In view of that fact, in addition to the following information we offer three general points of guidance: 1) report enrollments as you do to IPEDS (the U. S. Department of Education's *Integrated Postsecondary Education Data System*) (including associated definitions, etc.); 2) enlist the help of the person who does your institution's reporting to IPEDS (because they are intimately familiar with the world according to IPEDS; and 3) if in doubt, use your best professional judgment, exercised within the spirit and intent of SARA.

We encourage you to also read the Spring 2018 *NC-SARA Data Sharing Agreement* (found HERE), which is incorporated by reference in each institution's enrollment data submission.

What's new or notable for spring 2018 reporting?

- Different dates for submitting your data. For spring 2018, report between **May 21-June 11, 2018**. Each institution's SARA contacts will be sent a URL link on or around May 21.
- As was the case in 2017, there is no longer a cell size limit on reporting enrollments; report *actual enrollments* in each state. *Report actual enrollment numbers for each state, regardless of number.* (See footnote 2 on the following page for a related legal opinion.)
- For spring 2018, **DO NOT include out-of-state learning placements** in the enrollment data you report through this survey. Data on out-of-state learning placements is being collected in a separate survey, with a separate reporting guide and link – available HERE.
- Within the online form on which you will report your enrollments, we've added a space for you to briefly comment on any apparent anomalies in your data. Please do not ask questions here, as this box will not be actively monitored in that respect. Please email data@nc-sara.org directly for any questions not resolved by your state's SARA portal entity.

Reporting your institution's data:

Please determine who is going to coordinate this task for your institution internally, as all active institution contacts will receive an e-mail notice prompting reporting.

The required data reporting is based on the enrollment data your institution reports to *IPEDS* each year; NC-SARA asks you to disaggregate some of that data. The particular report that is to be disaggregated is

the Fall Enrollment Report (EF) that your institution was to submit to IPEDS between December 13, 2017 and April 11, 2018. NC-SARA sets its reporting period to occur approximately one month after the IPEDS deadline for reporting each year's fall enrollments; that IPEDS deadline is usually in early April each year. **The NC-SARA reporting period for spring 2018 will be May 21 -June 11, 2018.**

What data is reported?

SARA institutions will report the number of students enrolled exclusively in distance education delivered outside the home state of the institution[1]. While IPEDS requests *aggregated* data for your institution's out-of- state students within the United States, for this SARA report we ask you to *disaggregate those enrollments by state, territory, or district in which the students are located*.[2] (Institutions shall use the means they currently employ to determine their students' locations.)

The name/label/identifier for the relevant IPEDS field in which your institution reported that aggregated data for fall 2017 is: "Students enrolled exclusively in distance education courses and are located in U.S. but not in same state/jurisdiction as institution (EF2015A_DIST All students total). **The aggregated data you reported to IPEDS in that field for fall 2017 enrollments is the data you are to disaggregate by state, territory or district and submit to NC-SARA between May 21 – June 11, 2018.**

Based on the advice of counsel[3], NC-SARA believes that the requested data, even in small cell sizes, generally would not be personally identifiable information and, therefore, would not trigger concerns in regard to the federal Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g (FERPA), which addresses the privacy of student records maintained by or for schools (including institutions of postsecondary education) and school districts that are funded by programs of the U.S. Department of Education (USED). NC-SARA will not collect individually identifiable student data and complies with the Family Educational Rights and Privacy Act (FERPA).

However, a postsecondary institution should apply its established policies for masking or suppressing small size data in reporting data to NC-SARA when *BOTH* of the following circumstances apply:

- (1) if the postsecondary institution believes that the disclosure of this small cell size information, when linked to other information available in the school community, will enable reasonable

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[1] To help institutions better reconcile their reports to NC-SARA with their reporting to IPEDS, to facilitate NC-SARA's analysis and presentation of enrollment data, and to better represent the full distance education activity of SARA institutions, NC-SARA staff will propose for consideration by the NC-SARA Board at its May, 2018 meeting having SARA institutions, beginning in spring 2019, report in-state enrollments to NC-SARA, as well. Institutions currently report those enrollments to IPEDS.

[2] Authority – NC-SARA *Policy Manual*, Section 6; and Application for Institutional Participation in SARA, item 7. See "Documents" at www.nc-sara.org

[3] In 2014, NC-SARA obtained a formal legal opinion on SARA's data collection policies. That opinion is available at http://nc-sara.org/files/docs/NC-SARA%20Chicago%20board%20booklet.pdf pages 49-56. A subsequent opinion on removing cell size limit is available at http://www.nc-sara.org/files/docs/NC-SARA-Memo-EdCouncil_2017.pdf .

persons in the school community who do not have knowledge of the specific circumstances to identify the student; and

- (2) if disclosure of the information is not covered by the institution's directory information policy, or – if it is covered --students have opted out of that policy.

How does NC-SARA use the data?

NC-SARA reports institutional distance education enrollments by SARA institutions on its website, by institution name, in the following format:

Institution Name

NC-SARA Enrollment Data Reporting Guide – Spring 2018

Steps for NC-SARA Data Reporting

Gather the data your institution reported to IPEDS for its <u>fall 2017 </u>enrollment, *disaggregated by state, territory or district*.

1. NC-SARA will provide the designated SARA contacts at each SARA institution a secure link to a web form, on which is to be entered the institution's enrollment data. ALL SARA contacts for each institution will receive the *Data Enrollment Reporting Guide* each spring, several weeks before the NC-SARA data reporting deadline. The link to the actual reporting will be sent at the beginning of the reporting period. For 2018, the link will be sent May 21, 2018.

2. At the top of the web form, enter the total number of distance education students enrolled in each SARA state. (See *"How do I determine the location of a student?"* on page 9 of this *Guide.)* **NOTE: For spring 2018 there is no minimal cell size limit; report the actual number of enrollments, whether they are 30, 12, 3, or 0.** A value must be entered for each state. Insert zero for your home state. Once you have entered enrollments for SARA states, territories and districts, fill in the enrollment numbers for Non-SARA states. See the example below.

   Non-SARA States & Territories

California *		CNMI *	
Puerto Rico *		Massachusetts *	
Other Territories *			

3. Enter your institutional distance education enrollment data for each Non-SARA state. (As has been done in prior years, NC-SARA will report those enrollments as an aggregate total for Non-SARA states. As additional states join SARA, NC-SARA staff will move your institution's enrollment numbers for those states from the Non-SARA aggregate total to new columns for new SARA states as they join.) **Once again, report actual enrollments, with no cell size minimum.**

4. In spring 2017 we added a comment box; we have retained that for 2018. Use it to provide clarifying context for the data you report. Please do not ask questions here, as this box will not be actively monitored in that respect. And please do not use the comment box to update your institution's SARA contact information; contact your SARA state portal entity to update

institution information. Please email data@nc-sara.org directly for any data enrollment questions not resolved by your state's SARA entity.

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5. Finally, review and check the box stating your confirmation and authorization of the *Enrollment Data Sharing Agreement*. The full text of [NC-SARA's Enrollment Data Sharing Agreement document can be found HERE.](#)

6. Hit **Submit** to complete reporting.

7. The institution's SARA contacts will receive an e-mail from NC-SARA confirming receipt of the data submission.

Frequently (and a Few Important but Infrequently) Asked Questions:

Do all SARA institutions need to report their data, even if they just recently joined?

Yes. Regardless of when they join, institutions agree to do that in their application to participate in SARA. SARA staff at the regional and state levels will follow-up with institutions that fail to report.

My institution doesn't participate in federal financial aid programs, so we don't report our enrollments to IPEDS. What should we do about reporting to NC-SARA?

Report to NC-SARA with the same end goal: report the number of students your institution enrolled in fall 2017 via distance education, disaggregated by state, territory or district. If possible, apply IPEDS definitions throughout that process. IPEDS provides reporting guides, a searchable and downloadable glossary, and other helpful material, online at: https://nces.ed.gov/ipeds/Home/ReportYourData

Where can I find my institution's enrollment data?

That varies from institution to institution. Most institutions have someone who does institutional research (IR). Large institutions will have an IR department; small institutions may locate IR staff within various larger departments: academic affairs, business office, etc. *You want to find the person who handles your institution's IPEDS reports; she/he is designated the IPEDS Keyholder.* If you don't know where to look, first ask your department head.

How is "distance education" defined?

The U.S. Department of Education (ED) provides the following definition:

> **Distance education** means education that uses one or more of the technologies listed in paragraphs (1) through (4) to deliver instruction to students who are separated from the instructor and to support regular and substantive interaction between the students and the instructor, either synchronously or asynchronously. The technologies may include--
>
> (1) The internet;
>
> (2) One-way and two-way transmissions through open broadcast, closed circuit, cable, microwave, broadband lines, fiber optics, satellite, or wireless communications devices;
>
> (3) Audioconferencing; or
>
> (4) Video cassettes, DVDs, and CD-ROMs, if the cassettes, DVDs, or CD-ROMs are used in a course in conjunction with any of the technologies listed in paragraphs (1) through (3).
>
> Citation: https://surveys.nces.ed.gov/ipeds/VisGlossaryPopup.aspx?idlink=713

Because that is the definition used by IPEDS, that is the definition NC-SARA will use for spring 2018 SARA enrollment reporting.

What about IPEDS' "exclusively distance education" provision?

Reporting directions from IPEDS also specify that they collect as distance education enrollments only those enrollments in "A course in which the instructional content is delivered exclusively via distance education. Requirements for coming to campus for orientation, testing, or academic support services do not exclude a course from being classified as distance education." (This is the so-called "100 percent rule.") Because that provision applied to the distance education enrollments your institution reported to IPEDS on the 2017 Fall Enrollment report, it should be applied to the data disaggregated by state from that report that you report to NC-SARA.

So that means we don't report enrollments in "hybrid" courses, right?

Right – because you don't report those enrollments to IPEDS.

My institution has some uncommon operating policies or distance education activities.

(Examples: branch campuses in other states; online courses offered by a branch campus, located in another state; flexible course-start calendar; flexible "blended" courses; consortial arrangements with institutions in other states; etc.) How should we deal with those matters.

Our general answer to all such questions is to deal with the issue in the same way it was handled in your institution's IPEDS fall enrollment report. And if your institution doesn't report to IPEDS, using your best professional judgment report *as if you had reported* to IPEDS under their provisions.

How do we determine the location of a student?

Institutions should use the same data regarding the location of their distance education students that they used for enrollment reporting to IPEDS. NOTE: "Location" is the state where the student is located *while receiving the instruction* and does not refer to the student's official state of residence.

Remember, if you don't know the where your students are located you can't accurately report to IPEDS (and NC-SARA) and *you can't know whether your institution is in compliance with the laws, rules and regulations that cover those locations*.

IPEDS reporting allows institutions to report certain student enrollments as "location unknown." Does NC-SARA?

No – for the reasons mentioned just above. Enrollment data that SARA institutions reported in spring 2017 to both IPEDS and NC-SARA indicates that most SARA institutions appear to be doing a good job tracking and reporting the locations of their distance education students.

Do we report non-credit activities in other states?

No – because you don't report such activities to IPEDS.

Do we report international students?

No – because SARA, as an agreement between member U.S. states, territories and districts, doesn't involve other countries or affect international enrollments.

Any special points relating to reporting military students?

Yes. As best you can, report military students as you should all students: report them according to their location while taking the particular course or courses during the time period covered in the 2017 IPEDS Fall Enrollment report. Regarding APO (Army Post Office), FPO (Fleet Post Office), DPO (Diplomatic Post Office) or other U.S. military addresses (AE, AP, AA, etc.) Do not report enrollments with APO, FPO or DPO or other military addresses. The location of the student is reported, not the mailing address of the student.

When is the data due to NC-SARA?

NC-SARA requires *annual* reporting of distance education data. The deadline for reporting is approximately one month after the IPEDS deadline for reporting enrollments of the previous fall. Communication from NC-SARA will provide the exact deadline date each year. **The NC-SARA reporting period for spring 2018 will be May 21-June 11, 2018.**

Will NC-SARA audit our enrollment reporting?

No, we're depending on institutions to submit information that is as accurate as possible.

Technical Support:

The data entry web forms are designed as data entry pages: one to report enrollments for the SARA states and one for the Non-SARA states. If you encounter any technical issues, please contact NC-SARA for support at: data@nc-sara.org