

Spring 2017

NC-SARA Enrollment Data Reporting Guide



National Council for
State Authorization Reciprocity Agreements

A voluntary, regional approach to state oversight of distance education

NC-SARA Enrollment Data Reporting Guide – Spring 2017

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Introduction:

This *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.* 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 two general points of guidance: 1) report enrollments as you do to IPEDS (including associated definitions, etc.), and 2) if in doubt, use your best professional judgment, exercised within the spirit and intent of SARA.

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

What's different for spring 2017 reporting?

- Different dates for submitting your data. For spring 2017, report between **May 22-June 14, 2017**. Each institution's SARA contacts will be sent a URL link on or around May 22.
- There is no longer a cell size limit on reporting enrollments; report *actual enrollments* in each state. (In 2016 we instructed institutions to report "zero" for each state in which their enrollments were fewer than ten students. For 2017 there is no such directive. *Report actual enrollment numbers for each state, regardless of number.*) (See Appendix for legal opinion.)
- For spring 2017, **DO NOT include experiential learning placements** in the enrollment data you report. We plan to *encourage* such reporting in spring 2018 and *require* it (likely by two-digit CIP code) in spring 2019. Additional guidance on experiential learning placement reporting will be provided for the 2018 and 2019 reporting periods.
- Within the online form on which you will report your enrollments, we've added a space 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 entity.

Reporting your institution's data:

Please determine who is going to handle this task for your institution internally, as all active institution contacts will receive notice.

The required data reporting is based on the enrollment data your institution reports to the federal *Integrated Postsecondary Education Data System (IPEDS)* each fall; NC-SARA asks you to disaggregate some of that data. NC-SARA sets its reporting period to occur approximately one month after the IPEDS

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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 2017 will be May 22 -June 14, 2017.**

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. 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*.¹ (Institutions shall use the means they currently employ to determine their students’ location.)

The name/label/identifier for the relevant IPEDS field in which your institution reported that aggregated data for fall 2016 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 2016 enrollments is the data you are to disaggregate by state, territory or district and submit to NC-SARA between May 22 – June 14, 2017.**

Based on the advice of counsel², 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).

However, we caution that 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 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.

¹ Authority – NC-SARA *Policy Manual*, Section 6; and Application for Institutional Participation in SARA, item 7. See “Documents” at www.nc-sara.org

² 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 Appendix 1 of this document.

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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

The screenshot shows the 'NC-SARA Annual Enrollment Reporting' interface. At the top right, it says 'Page: 1|2'. Below the title is a section titled 'SARA States & Territories'. This section contains a grid of 24 rows and 2 columns. Each row lists a state or territory name followed by a small red asterisk and an empty input field. The states and territories listed are: Alabama, Arizona, Colorado, Delaware, Hawaii, Illinois, Iowa, Kentucky, Maine, Michigan, Mississippi, Montana, Nevada, New Jersey, New York, Alaska, Arkansas, Connecticut, Georgia, Idaho, Indiana, Kansas, Louisiana, Maryland, Minnesota, Missouri, Nebraska, New Hampshire, New Mexico, and North Carolina.

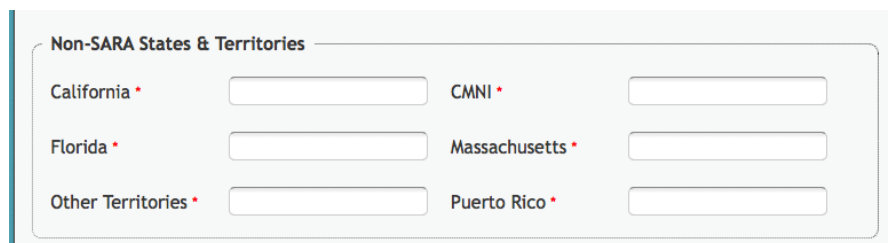
NC-SARA will not collect individually identifiable student data and will comply with the Family Educational Rights and Privacy Act (FERPA).

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Steps for NC-SARA Data Reporting

Gather the data that you reported to IPEDS for your fall 2016 enrollment, *disaggregated by state, territory or district.*

1. NC-SARA will provide each SARA institution a secure link to a web form, on which you will enter your institution's enrollment data. The SARA contacts for your 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.
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 7 of this Guide.)
NOTE: Unlike 2016, for spring 2017 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 and territories, you then fill in your enrollment numbers for non-SARA states. See the example below.



Non-SARA States & Territories					
California *	<input type="text"/>	CMNI *	<input type="text"/>		
Florida *	<input type="text"/>	Massachusetts *	<input type="text"/>		
Other Territories *	<input type="text"/>	Puerto Rico *	<input type="text"/>		

3. Enter your institutional distance education enrollment data for each Non-SARA state. (As indicated above, 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. You will see that for spring 2017 we have added a comment box. This field may be used to explain any apparent data anomalies or 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. Please email data@nc-sara.org directly for any data enrollment questions not resolved by your state's SARA entity.



Comments

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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. Confirmation of the submission of the report will be sent from NC-SARA's system to all active institution contacts on file.

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Frequently Asked Questions:

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. If you don't know where to look, first ask your department head.

How is "distance education" defined?

The US 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 we will use for spring 2017 SARA enrollment reporting.

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 you handled it in your IPEDS fall enrollment report.

How do I 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 information provided 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.

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

Do we report non-credit activities in other states?

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

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 2017 will be May 22-June 14, 2017.**

Will NC-SARA audit our enrollment reporting?

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

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 and consequences for failure to report are being developed for 2018.

Technical Support:

The data entry web forms are designed to be simply 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

EducationCounsel

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Memorandum

To: Marshall A. Hill
Executive Director
National Council for State
Authorization Reciprocity Agreements (NC-SARA)

From: Steven Y. Winnick

Date: March 16, 2017

Re: Reporting Small Cell Size Data to NC-SARA

This memorandum responds to your February 28, 2017, memorandum to Art Coleman requesting advice regarding the consistency with the Family Educational Rights and Privacy Act (FERPA; 20 U.S.C. §1232g) of a proposed revision in NC-SARA's collection of data from postsecondary institutions. Data are collected on the number of students who are located out-of-state and who are enrolled in the institution via distance education. The data show in aggregate form the states in which these students are located while taking the instruction. The proposed revision on which you seek advice is to instruct institutions to report actual enrollment totals for each state without masking or suppressing small cell size data for states with fewer than ten students, subject to an important exception discussed below. In the past, institutions were instructed to report zero students for each such state, so as to mask these small cell size data and avoid the possible indirect personal identification of students within these cells. However, your memorandum indicates that the prior policy resulted in many reports of zero students in all or many states, thereby undermining the purposes for which the data were disclosed to NC-SARA. For the reasons described below, we advise that your proposed change in collecting small cell-size data, subject to the exception described, complies with FERPA.

As discussed in an opinion letter of May 5, 2014, that we provided to you, FERPA prohibits educational institutions funded by the U.S. Department of Education (USED) from disclosing personally identifiable information from students' education records without the consent of a parent or, in the case of postsecondary students, of the student, unless the disclosure comes within a list of authorized disclosures in the law. FERPA regulations define "personally identifiable information" as including but not limited to the student's name; the name of the student's parent or other family members; other named identifiers; and "other information that, alone or in combination, is linked or linkable to a specific person that would allow a reasonable person in the school community, who does not have knowledge of the relevant circumstances, to identify the student with reasonable certainty. . . ." (34 CFR §99.3)

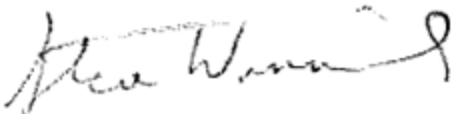
As we previously advised you in our May 5, 2014, opinion letter, while there is not a clear answer to this issue, particularly because USED has not addressed what the "school community" means with reference to distance education, we believe there is a good argument that the disclosure of the subject enrollment data disaggregated by the state in which the student is located while taking the instruction would not make the information linkable to an individual student by a reasonable person in the school community. Interactions among students are likely to be limited in a distance education program and it seems unlikely that persons in the school community would be able to identify the individual student based on this

information.¹ The reporting of numbers of distance education students by state therefore may not involve a disclosure of personally identifiable information under FERPA.

Your memorandum indicates an intent to instruct institutions to report actual student data by state without masking or suppressing data for small cell sizes, subject to the exception that an institution, in reporting data to NC-SARA, should apply its own established policies for masking or suppressing small cell size data if **both** of the following circumstances apply:

1. If the postsecondary institution believes that the disclosure of the small cell size information, when linked to other information available in the school community, will enable reasonable 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 students have opted out of that policy.

Given the absence of precedents on this issue, and consistent with our prior opinion letter, we believe that the inclusion of these cautionary exceptions is advisable to assure compliance with FERPA.



Cc: Art Coleman
Terri Taylor

¹ Employees may have specialized knowledge of the student by virtue of their jobs, but that would not bring the disclosure within the FERPA definition of personally identifiable information.