



Elevating Equity Through Better Data

2021 Proposal for Changes to the Office of Higher Education's Student-Level Data Collection

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About the Minnesota Office of Higher Education

The Minnesota Office of Higher Education is a cabinet-level state agency providing students with financial aid programs and information to help them gain access to postsecondary education. The agency also serves as the state's clearinghouse for data, research and analysis on postsecondary enrollment, financial aid, finance and trends.

The Minnesota State Grant Program is the largest financial aid program administered by the Office of Higher Education, awarding up to \$207 million in need-based grants to Minnesota residents attending eligible colleges, universities and career schools in Minnesota. The agency oversees other state scholarship programs, tuition reciprocity programs, a student loan program, Minnesota's 529 College Savings Plan, licensing and early college awareness programs for youth.

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Executive Summary

This report contains recommendations for changes in the reporting of student level data by institutions to the Office of Higher Education (OHE) for OHE's Enrollment and Awards Conferred databases. Over the past year, staff from OHE have engaged representatives from a cross section of institutions, sectors, and systems to review OHE's existing data collection and to discuss potential new data elements. The changes proposed and described in this report are necessary to address critical postsecondary issues identified by policymakers as well as Minnesota students and their families.

Recommendations

OHE proposes collecting the following **new data** elements about student characteristics, academics, finance and data privacy:

- Detailed racial and ethnic subgroups, and Tribal affiliation of American Indian and Alaska Native students.
- Inclusive gender identity options including categories for transgender, non-binary and other gender minority students.
- Grade point average (GPA) data including high school GPA, term GPA and cumulative GPA
- Flags for completion of college-level math and English/reading/writing (ERW) courses.
- Cumulative debt at graduation.
- FERPA (Family Education Rights and Privacy Act) block on directory information.

OHE proposes to **modify collection** of several data items:

- Adopt a new definition of first generation student, using the federal definition (neither parent completed a bachelor's degree) for consistency of reporting.
- Stop mandating MARSS ID (K-12 student identifier).
- Rename Gender field as Sex, adding the "X" designation to align to state documents.
- Use two summer term codes in Term Season: one for "leading" terms and one for "trailing" terms.
- Switch to decimal values for credits attempted, completed, accumulated and transfer.
- Add 2020 Classification of Instructional Program (CIP) codes as valid entries for majors, and 2020 as a valid CIP Major Year code.
- Modify labels for basic race/ethnicity codes.
- Merge "not an undergraduate" codes with "unavailable" codes for relevant data items.

OHE proposes **ending collection** of the Enrollment Status field and will instead calculate enrollment intensity (full-time/part-time) from credits attempted.

OHE proposes **two process changes**.

- Simplified reporting for institutions offering exclusively short-term programs.
- Voluntary collection of teacher preparation program data.

OHE determined that several proposals for new data are not feasible at this time based upon discussions with institutions:

- Data on basic needs insecurity.
- Student participation in developmental education reforms (for example, co-requisite remediation).
- Transfer credits accepted by source.
- Improved name tracking across different cultural naming conventions.

These proposed changes to enrollment and awards conferred data will improve OHE's ability to understand equity gaps by student demographics, analyze more factors connected to student success (such as GPA and college-level coursework), and evaluate the performance of Minnesota's overall postsecondary system. OHE can use this information to aid students and families in making informed college decisions, identify strengths and weaknesses within the postsecondary system, and ensure that outcomes for underserved student populations are being captured.

Introduction

This report contains recommendations for changes in the reporting of student level data by institutions to the Office of Higher Education (OHE) for OHE's Enrollment and Awards Conferred databases. The enrollment database includes data on students enrolled in Minnesota private and public postsecondary institutions, and the awards conferred database includes data on credentials (certificates, diplomas, and degrees) conferred to students upon successful completion of a program of study.

OHE collects student-level data from institutions under Minnesota Statutes 2020, section 136A.121, subdivision 18(a) which mandates submission of data from institutions participating in the Minnesota State Grant program, and Minnesota Statutes 2020, section 136A.1701, subdivision 11(a) which mandates submission of data from institutions participating in the Minnesota SELF Loan program.

Minnesota Statutes 2020, section 136A.121 subdivision 18 (a). An eligible institution must provide to the office data on student enrollment and federal and state financial aid.

Minnesota Statutes 2020, section 136A.1701, subdivision 11 (a). An eligible institution must provide to the office data on student enrollment and federal and state financial aid.

Data Advisory Committee Background

Every five years OHE convenes a Data Advisory Committee to consider changes to the Student Enrollment and Awards Conferred data collections. The Committee consists of representatives from the institutions OHE gathers data from, institutional research staff, and other stakeholders. As policy questions and data collected by higher education institutions evolve, OHE seeks to modify data collections to meet changing needs. A list of institutions, systems, and organizations represented is provided in Appendix B. This process conforms to requirements of Minnesota Statutes 2020, section 136A.121, subdivision 18(b) and Minnesota Statutes 2020, section 136A.1701, subdivision 11(b) mandating OHE to consult with a data advisory committee prior to proposing changes.

OHE last undertook this process in 2015-2016. The 2016 process resulted in changes that have significantly improved OHE's ability to answer important research questions for the state in the last five years:

- Year-round data collection (expanded from fall-only collection) strengthened analysis of student enrollment patterns, transfer pathways, and course-taking patterns
- Subject data on developmental education course-taking allowed analysis of participation in developmental education by subject area
- Additional student characteristics, such as first generation and veteran status, improved analysis of equity gaps based on student demographics

The 2016 process also highlighted challenges for future data collections, particularly the need for detailed race and ethnicity data to improve understanding of student diversity and enable better analysis of equity gaps within basic race/ethnicity categories. At the time, no institution gathered detailed race/ethnicity data beyond federal requirements. In the intervening five years, both public systems have implemented detailed race/ethnicity data collections. This topic was a central focus of our 2020 process, yielding recommendations for adding detailed race/ethnicity data.

2020-2021 Process

Over the past year, staff from OHE engaged representatives from a cross section of institutions, sectors, and systems to review OHE's existing data collection and to discuss new data elements. OHE proposed changes to address critical postsecondary issues of policymakers and students and their families. OHE hosted nine meetings between June 2020 and March 2021. A list of meeting dates and their agendas is provided in Appendix A. A list of institutions, systems, and organizations represented is provided in Appendix B. OHE also solicited feedback from institutional and system stakeholders via e-mail and phone. The stakeholders provided important context and feedback that is reflected in these recommendations. Specifically, OHE's research staff consulted with institutions and systems to review OHE's proposed changes, agree on common definitions, discuss data limitations, ensure institutional capacity, and develop an implementation timeline. Finally, OHE consulted with additional stakeholders and subject matter experts on relevant topics.

Proposed Changes to Data Collected

There are four categories of proposed changes to data collected:

1. New data
2. Modifications to existing data collected
3. Data elements no longer collected
4. Process changes

1. New Data

Recommendations for new data elements will add understanding to important questions in postsecondary education in Minnesota. New data on student demographics will allow for analysis of equity gaps by detailed race/ethnicity and gender identity. The addition of data elements for students' Grade Point Average (GPA) and completion of college-level coursework will enhance understanding of factors related to student success. Finally, student-level data on cumulative debt at graduation will allow for more accurate cumulative debt statistics across degree programs and enable analysis of equity gaps.

Table 1. New Data Proposed

Item	Details	Rationale
Detailed Racial/Ethnic Origin Subgroups	Add four data elements for reporting of racial/ethnic subgroups (allow for reporting of multiple selections by the student); add elements for tracking the Tribal affiliation of American Indian and Alaska Native students	Improve understanding of the diversity of Minnesota postsecondary students; enable analysis of equity gaps by subgroups within basic race/ethnicity categories
Inclusive Gender Identity	Add four data elements for Gender Identity, with option sets based on those currently in use in Minnesota institutions	Improve understanding of the diversity of gender identity among Minnesota postsecondary students. Enable analysis of equity gaps for transgender, non-binary, and other gender minority students
Grade Point Average (GPA) - High School, Term, and Cumulative	Add three GPA elements: High School GPA (from transcripts), Term GPA, and Cumulative GPA	Gap in state research: GPA values can enhance understanding of student success patterns
Completed College-Level Math and	Add two elements as flags: one for completed college-level math, and the	Understand relationship to persistence and completion patterns

Item	Details	Rationale
English/Reading/Writing (ERW)	other for completed college-level English/Reading/Writing (ERW)	
Cumulative Debt at Graduation	Add element for Cumulative Debt at Graduation to Awards Conferred data collection	Eliminate the need for a separate survey; student-level debt data will improve accuracy of median debt statistics and allow for equity analysis of debt patterns by student demographics
FERPA (Family Education Rights and Privacy Act) Block on directory information	Add element to indicate that the student has requested a FERPA block on part or all of their directory information	Compliance with FERPA

Detailed Race/Ethnicity

Adding fields for detailed racial and ethnic subgroups serves two purposes: 1) allows for analysis of important differences in student enrollment and completion patterns by subgroups within the basic federal race/ethnicity categories, and 2) allows for reporting of multiple race/ethnicity selections by the student to attain a more accurate picture of the diversity of Minnesota postsecondary students.

OHE’s Educational Attainment report, which uses Census data to analyze attainment outcomes, highlights significant differences in attainment for subgroups within larger racial and ethnic categories. For example, while Asian Minnesotans have an overall attainment rate of 60.5%, subgroup attainment rates range from 5.4% for Burmese Minnesotans to 91.2% for Indian Minnesotans; while Black Minnesotans have an attainment rate of 30.1% overall, subgroup rates range from 17.9% for Somali Minnesotans to 40.0% for Liberian Minnesotans.¹

In recent years, both the Minnesota State Colleges and Universities system and the University of Minnesota system have added detailed racial and ethnic subgroups to their applications. Subgroup options have also been added to the Common Application. Option sets in use include both regional and country- or cultural-group options. OHE’s proposed option set nests country- and cultural-group options inside regional options, using the United Nations M49 standard as a reference for defining regions.²

Both systems have also implemented collection of Tribal affiliation for American Indian and Alaska Native students. In addition to the Data Advisory Committee, OHE consulted with the Tribal Nations Education Committee (TNEC) to propose the addition of Tribal affiliation to OHE’s student data collections. Based on these consultations, OHE proposes creating two types of fields: one type for the

¹ Fergus, M. (2020). Educating for the Future 2020 Update. *Minnesota Office of Higher Education*. Available here: https://www.ohe.state.mn.us/pdf/EducatingfortheFuture2020_final.pdf

² Available here: <https://unstats.un.org/unsd/methodology/m49/>

name of the student's Tribe if the student is enrolled, and another type for the names of the student's Tribe or Tribes if the student is descended but not enrolled.

Consultation with TNEC also highlighted the importance of disaggregating data when students report multiple race/ethnicity selections. Currently, OHE gathers race/ethnicity in a single field that aligns to federal data collection methods: students reporting as Hispanic or Latino are reported as such regardless of their race selections, and non-Hispanic students who select multiple races are reported as multiracial. Data Advisory Committee discussions noted that many institutions track the multiple selections separately – and can report these separately. OHE proposes adding the basic race/ethnicity selections to the detailed option sets in order to allow institutions to report multiple basic race/ethnicity selections by students in addition to detailed subgroups.

Inclusive Gender Identity

Significant changes have also taken place in recent years regarding institutional data collections on the topic of gender. In particular, both of Minnesota's public systems and some private institutions have begun gathering students' current gender identity in addition to students' sex. Similar changes have occurred with the Common Application, which now gives students the option to report on their gender identity in addition to their sex. Gender identity refers to "a person's internal sense of gender" and may or may not be consistent with their sex assigned at birth.³ The term cisgender describes a person whose gender identity is consistent with their sex assigned at birth, while terms such as transgender, non-binary, genderqueer and others are used to describe gender identities that differ from sex assigned at birth or that otherwise do not conform to dominant societal norms for gender.⁴

A growing body of research demonstrates that transgender, non-binary and other gender minority individuals face significant discrimination that may affect educational outcomes. The US Transgender Survey found that 24% of people who were perceived as transgender in college were verbally, physically, or sexually harassed.⁵ Adding gender identity to OHE's student data collection will allow for OHE to include transgender, non-binary and other gender minority students in reporting on the gender of Minnesota postsecondary students, and will facilitate analysis of equity gaps.

In considering this proposal, OHE invited input from staff at campus LGBTQ+ centers in addition to Data Advisory Committee members. Based on these discussions, OHE proposes adding fields for gender identity with option sets based on those in use at institutions that gather this data. In addition, OHE proposes renaming the current Gender field to Sex, with options Male, Female, Another Option Not

³ Federal Interagency Group on Improving Measurement of Sexual Orientation and Gender Identity in Federal Surveys. "Current Measures of Sexual Orientation and Gender Identity in Federal Surveys." August, 2016, page 4. Available here: <https://nces.ed.gov/FCSM/pdf/buda5.pdf>

⁴ The LGBTQIA Resource Center at the UC Davis provides a glossary of terms available here: <https://lgbtqia.ucdavis.edu/educated/glossary>

⁵James, S. E., Herman, J. L., Rankin, S., Keisling, M., Mottet, L., & Anafi, M. (2016). The Report of the 2015 U.S. Transgender Survey. Washington, DC: National Center for Transgender Equality. Page 11. Available here: <https://transequality.org/sites/default/files/docs/usts/USTS-Full-Report-Dec17.pdf>

Listed (to align to third designations on official documents, such as the “X” designation on state driver’s licenses) and Not Reported.

Metrics Relating to Persistence and Success

Data elements proposed for GPA (high school, term, and cumulative) and completion of college-level math and English/reading/writing courses will aid in analysis of student persistence and success. Research has identified a significant positive relationship between both high school GPA and first-year college GPA and future college persistence.⁶ In addition, completion of gateway coursework such as college-level math is a significant predictor of retention.⁷

Cumulative Debt at Graduation

OHE currently collects cumulative debt at graduation through the use of the Financial Aid Awarded/Cumulative Median Student Loan Debt survey. Through this survey, institutional respondents are asked to input the number of graduates, the number of graduates with loans, and the median cumulative debt of graduates who have loans, all per award level type. In reporting sector and statewide totals for student loan debt, OHE calculates an average of these medians. The revised awards conferred data collection would ask institutions to include cumulative student loan debt for each graduate on a student-level basis. This addition will allow OHE to calculate more accurate aggregate graduate debt information, as well as allow for debt information to be disaggregated by demographic information such as race and gender. Identifying patterns in graduate borrowing by these demographic groups will allow OHE to tailor and evaluate future policy to better serve the needs of these students.

2. Modifications to existing data

OHE proposes a number of modifications to existing data. These changes will clarify existing data elements, eliminate unnecessary codes, and reduce reporting burden on institutions by simplifying the data collection.

⁶ Stewart, S., Lim, D. H., & Kim, J. (2015). Factors influencing college persistence for first-time students. *Journal of Developmental Education*, 12-20.

⁷ Moore, C., & Shulock, N. (2009). Student progress toward degree completion: Lessons from the research literature (pp. 8-10). California State University, Sacramento, Institute for Higher Education Leadership & Policy.

Table 2. Proposed Modifications to Existing Data

Item	Details	Rationale
Adopt a single definition of First Generation student	Simplify this field to the federal definition, which is the common option tracked and reportable across institutions: “a student neither of whose parent(s) or legal guardian(s) completed a Bachelor’s degree”	Current options do not align and are not consistently gathered across institutions.
MARSS Number	Stop mandating MARSS reporting	Reduce reporting burden especially in cases where manual entry was previously required.
Modify Gender field (change to Sex, with expanded option set)	Rename Gender field to Sex, keeping current options of Male (M), Female (F), and Unavailable (Z) while adding “Another Option Not Listed” (X)	Definitional clarity and alignment of terms; addition of “X” designation aligns to legal documents including state driver’s licenses
Switch to two summer term options	Switch from one summer term code to two: one for “leading” summer terms (terms that begin the academic year), and one for “trailing” summer terms (terms that end the academic year)	Align to financial aid categorization of summer terms, improve ease of analysis when including summer term data in fiscal or academic years
Switch to decimal values in Credits fields	Currently, units of instruction attempted and completed are entered to the hundredth without a decimal; switch to gathering these values to the hundredth with a decimal	Reduce confusion and reporting burden in submitting data
Add 2020 Classification of Instructional Program (CIP) Codes	Add 2020 CIP codes as valid entries in fields for Major1 and Major2; add the year 2020 as a valid entry in fields for CIP Major Year	Align to the latest release of CIP code changes from the National Center for Education Statistics
Modify basic race/ethnicity labels	Modify labels: "Black" to "Black or African American", "Hispanic" to "Hispanic or Latino", "Non-Resident Alien" to "International Student"	Better alignment to federal race/ethnicity terminology; more accurate and more inclusive labeling of international students
Merge “not an undergraduate” codes with “unavailable” codes	Three fields that only apply to undergraduate students contain a code for “not an undergraduate” as well as a code for “unavailable”; delete “not an undergraduate” code and simply use “unavailable”	No use case for two separate codes; eliminate unnecessary confusion and reporting burden

3. Items No Longer Collected

OHE identified one data element (Enrollment Status) that is unnecessary and proposes to eliminate it. This will reduce reporting burden and confusion.

Table 3. Items No Longer Collected

Item	Details	Rationale
Enrollment Status	Stop collecting Enrollment Status, compute Full-Time/Part-Time from credits values	Unnecessary data element since enrollment intensity (full-time/part-time) can be calculated from instructional units attempted

4. Process changes

OHE proposes two process changes. First, simplified reporting for institutions that exclusively offer short-term programs. This change will reduce reporting burden by offering simplified reporting templates that exclude data elements that are not relevant to these institutions. Second, institutional stakeholders expressed interest in a voluntary process for collecting data on educator preparation programs in order to facilitate reporting on student outcomes for institutions that opt in.

Table 4. Process Changes

Item	Details	Rationale
Simplified short-term program reporting	Truncated reporting requirements for institutions that exclusively offer short-term programs	Reduce reporting burden, simplify process
Voluntary collection of educator preparation program data	Institutions could choose to report data on educator preparation programs in order to analyze outcomes	Interest from institutions in reporting on outcomes

Proposed Changes Not Feasible at This Time

Several items were considered but determined to be infeasible at this time. These proposals suggest topics for future data conversations.

Table 5. Proposals Not Feasible At This Time

Item	Details	Reason for Rejection
Basic Needs Insecurity	Add fields for tracking food and housing insecurity	Institutions do not currently gather this data in student information systems
Student participation in developmental education reforms	Track participation in reforms to developmental education course delivery models, for example co-requisite remediation	Data is not currently tracked in a way that would allow comprehensive reporting across developmental education reforms
Transfer Credits Accepted by Source	Disaggregate transfer credits by the source of the credit, such as Advanced Placement (AP), International Baccalaureate (IB), College-Level Examination Program (CLEP), Military, Prior Learning, and other sources	Not technically feasible to report at this time
Improve name tracking across cultural conventions	Consider changes to first/middle/last name fields that would improve student matching across cultural naming conventions	Lack of a clear universal framework at this time

Basic Needs Insecurity

A 2020 report from the Hope Center found that 37% of student respondents at 28 Minnesota State Colleges and Universities were food insecure in the prior 30 days, and nearly half (48%) of respondents were housing insecure in the previous year.⁸ OHE does not currently collect data on basic needs insecurity of college students. Doing so would provide useful data to inform campus initiatives, programming, and legislation. However, this information is not currently gathered comprehensively at institutions. Consideration of adding student-level data on basic needs insecurity to OHE’s data collection should be a topic of future conversations.

⁸ https://hope4college.com/wp-content/uploads/2020/03/2019_MinnesotaState_Report.pdf

Data on Developmental Education Reform Implementation

In recent years, the Minnesota State Colleges and Universities system has implemented reforms outlined in the Developmental Education Strategic Roadmap⁹. These reforms seek to improve accuracy in developmental education placements and increase student success in developmental courses. OHE discussed the possibility of including data reflecting these changes in OHE's enrollment data collection in order to analyze student patterns of participation in these reforms. This could include information on the type of developmental education course, for example co-requisite remediation or accelerated courses. OHE is aware of at least one other state – Texas – that gathers data on the type of developmental course delivered. However, at this time the information is not tracked in Minnesota institutions in a way that would allow for reporting at the student level.

Transfer Credits Accepted by Source

Analysis from the National Student Clearinghouse shows that over one third of undergraduate students nationally transfer at some point in their college career.¹⁰ In addition, growing numbers of Minnesota students participate in rigorous course taking in high school to earn college credit.¹¹ OHE proposed adding the source of transfer credits in order to analyze transfer credit patterns among students entering college or transferring institutions. Currently this information is not tracked consistently across institutions in a way that is reportable in enrollment data.

⁹ Available here: <https://www.minnstate.edu/system/asa/studentaffairs/academicreadiness/docs/Developmental-Education-Strategic-Roadmap.pdf>

¹⁰ Shapiro, D., Dundar, A., Huie, F., Wakhungu, P. K., Bhimdiwala, A., Nathan, A., & Hwang, Y. (2018). Transfer and mobility: A national view of student movement in postsecondary institutions, fall 2011 cohort.

¹¹ For example, data from the Statewide Longitudinal Education Data System (SLEDS) show that participation in Advanced Placement among Minnesota high school graduates increased from 16% to 31% from 2012 to 2019. http://sleds.mn.gov/#rigorousCourseTaking/orgId--999999000_groupType--state_ECODEVREGION--FOC_NONE_rigorousCourseTakingCOHORTID--2019_p--1

Conclusion

These proposed changes to enrollment and awards conferred data will improve the ability to understand important equity gaps by student demographics, factors connected to student success, and the performance of Minnesota's overall postsecondary system. OHE can utilize the information derived from such data to aid students and families in making informed college choice decisions, identify strengths and weaknesses within the postsecondary system, and ensure that outcomes for underserved student populations are being captured.

Appendix A: Meeting Schedule

Table 6. OHE Data Advisory Committee Meeting Schedule and Agendas

Date	Agenda
June 17, 2020	Overview of process Review current data collection Proposed changes
July 15, 2020	Review status of proposals First items ready for final recommendation Discuss adding race/ethnicity detail
August 19, 2020	Discuss adding inclusive gender identity Discuss modifying first generation definition Review draft proposals
September 16, 2020	Review draft proposals Further discussion: detailed race/ethnicity Further discussion: first generation
October 21, 2020	Review edits to drafts based on feedback Discuss adding cumulative debt at graduation Updates on stakeholder engagement
November 16, 2020	Further discussion: cumulative debt Finalize draft of gender identity fields
December 9, 2020	Finalize drafts of detailed race/ethnicity and Tribal affiliation fields
January 22, 2020	Discuss revisions to current Gender field Next steps and implementation
March 5, 2021	Finalize draft of modifications to Gender field Review draft Data Sharing Agreement

Appendix B: Institutions, Systems and Organizations Represented

Adler Graduate School
Augsburg University
Aveda Arts & Sciences Institute Minneapolis
Bethany Lutheran College
Bethel University
Capella University
The College of St. Scholastica
Concordia University-St. Paul
Crown College
Dunwoody College of Technology
Empire Beauty School
Gustavus Adolphus College
Hamline University
Hastings Beauty School
Herzing University
Institute of Production and Recording
Leech Lake Tribal College
Macalester College
Martin Luther College
Minneapolis College of Art and Design
Minnesota Department of Education
Minnesota Department of Employment and Economic Development
Minnesota House of Representatives Fiscal Analysis
Minnesota Private College Council
Minnesota Senate Counsel, Research and Fiscal Analysis
Minnesota School of Cosmetology
Minnesota State Colleges and Universities System
North Central University
Northwestern Health Sciences University
Nova Academy of Cosmetology
PCI Academy
Rasmussen University
Red Lake Nation College
St. Catherine University
St. Olaf College
Summit Academy OIC
University of Minnesota System
University of Northwestern-St. Paul
University of St. Thomas
Walden University
White Earth Tribal and Community College



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