

REPORT

Increasing the Effectiveness of State Reporting Requirements and Student Disclosures for Private Postsecondary Institutions

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Executive Summary

California's economy depends on skilled labor. However, the supply of workers with associate and bachelor's degrees has been unable to keep up with demand (Johnson, Cuellar Mejia, & Bohn, 2015). Private for-profit institutions in California play a key role in promoting access to postsecondary education, enrolling between 13-19% of all undergraduate students (Jez, 2012). But high profile collapses of large for-profit institutions have increased scrutiny on their practices (Halperin, 2015).

California's Bureau for Private Postsecondary Education (the Bureau) aims to protect students and consumers through oversight of private institutions of higher education operating in the state. The state and the Bureau do this by ensuring that the state, students, and the public have the information necessary to understand the practices and stability of private postsecondary institutions and the education they provide. The Bureau receives this information via the reporting requirements in the annual report that each institution submits each year. Reporting requirements are an integral part of institution and program evaluation and allow overseeing entities to monitor and track institutional, program, and student progress. Ideally, regular reporting promotes institutional accountability and transparency to students and consumers while assuring a minimal level of educational quality.

Students, consumers, and the public receive this information via an institution's Student Performance Fact Sheet (SPFS) and catalog. Student disclosure information provides students and consumers with important information they can use to make decisions about an institution and its educational programs.

A TWO-FOLD FOCUS: REPORTING REQUIREMENTS AND STUDENT DISCLOSURE INFORMATION

To improve the quality of private postsecondary institutions in California vis-à-vis improved reporting requirements, I answer the following research questions in this report:

1. What reporting requirements are commonly used in the oversight of higher education institutions?
2. What is the efficacy of the various reporting requirements used in the oversight of higher education institutions?
3. What would be the most effective reporting requirements for the Bureau to adopt in an effort to meet the objectives stated in its mission?

To promote informed decision-making by students and consumers, I answer the following research questions in this report:

1. What metrics should be included in the Bureau's student disclosure information?
2. How should the Bureau provide student disclosure information to students and consumers?

To answer these questions, I led an examination of other major higher education entities' reporting requirements, reviewed related research and reports, conducted interviews and focus

groups of students and experts, and administered a student survey. Using the data from these sources, I used traditional policy analysis methods to determine the most effective reporting requirements for the Bureau.

RECOMMENDATIONS FOR IMPROVING REPORTING REQUIREMENTS

To improve reporting requirements, the Bureau should:

- **Collect student-level data from the schools and calculate key metrics itself**, which would allow the Bureau to match student-level data with that in existing state databases, resulting in more accurate, complete, comparable, and consistent data. Moreover, this shift in process would alleviate some of the Bureau's workload, as it would no longer have to spend significant resources educating institutions on calculating the various metrics.
- **As relevant, the Bureau should publish benchmark information from similar institutions or programs alongside institutional and program data.** This would provide useful context.
- **Continue to make annual reports publicly available and in a format accessible to analysts** (such as the Excel spreadsheet currently used). The Bureau should consider posting the reports immediately after they are submitted.
- **Institutional characteristics**
 - **Model financial indicator requirements after the U.S. Department of Education IPEDS requirements for Title IV compliance.** In the long-term, the Bureau should require institutions submit financial data to reflect the more disaggregated categories of financial data that non-profit and public institutions submit to IPEDS. Moreover, the Bureau should create indicators that aid in the comprehension of the indicators, such as percentage of revenues spent in a specific category.
 - **Require that institutions report legal, regulatory, and accreditor actions, audits, and investigations.**
- **Program characteristics**
 - **Collect comprehensive information on an institution's programs**, including enrollment, credit hours, tuition, student performance, and 6-digit CIP code.
 - **Require disaggregated total costs faced by students.** In the long term, I recommend that the Bureau conduct a study to understand what costs are typical for students at the institutions it oversees and require that institutions report these costs and provide budgets for students of varying profiles.
 - **Gather a wider range of information on enrolled student characteristics**, including academic preparedness, hours worked, race and ethnicity, gender, disability, and income. Moreover, the Bureau should collect information on the

context of an institutions community, such as its unemployment rate and household income.

- **Student outcomes**
 - **Due to the short length of most programs, do not require student retention or withdrawal rates.**
 - **Require data about on-time graduation rates.** Also, require that **institutions report why students do not finish.**
 - **Continue its practice of requiring that institutions report licensure exam passage rates.**
 - Work with the California Employment Development Department (EDD) to **obtain state unemployment insurance data for job placement and earnings.** In the future, the Bureau should consider approaching the state or federal treasury to use income tax data to **obtain more comprehensive earnings data for students and occupation information.**
 - **Obtain metrics on student debt levels, repayment rates, and debt-to-earnings ratios** for graduates and non-completers. Discontinue the required reporting of student default rates, which are not understood by students.
 - Use the expertise of an independent organization to **survey students about their level of satisfaction** with their program. If the state cannot support independent surveying, I do not recommend that the Bureau require reporting on student satisfaction.

- **Narrative information**
 - **Direct institutions to provide a narrative** to explain substantive changes or issues not adequately captured in the metrics reported. Additionally, require institutions to **immediately report any substantive changes that occur mid-year**, similar to the way the Securities and Exchange Commission requires such information be reported on its Form 8-K by publicly traded companies.

RECOMMENDATIONS FOR IMPROVING STUDENT DISCLOSURE INFORMATION

Focusing on what information students should have and how this information should be provided to students, the Bureau should:

- **Include information beyond performance metrics, and provide program characteristics of importance** to prospective students, including location and length of program, cost to student, course schedule, size of program, and class size.

- **Present information about student outcomes**, including job prospects and placement rates, licensure exam passage rates, graduation rates, former students' earnings and wages, and why students don't complete their programs.
- **Promote the use and usefulness of the Student Performance Fact Sheet (SPFS)** by:
 - **Making the information simpler and more compelling**
 - **Provide just the key data metric**, not the calculation of the metric.
 - **Provide a graphical representation of the information**, not just a table with the data.
 - **Give a graphical comparison to similar programs in the region with a clear, declarative statement interpreting the information.**
 - **Standardize the format of the SPFS.**
 - **Increase accessibility of the SPFS on institutional websites.**
 - **Providing the information at the right time**
 - **Link the SPFS with financial aid applications**
 - **Increase connections with high schools** to ensure that high school faculty, staff, and administrators can effectively counsel students on using the SPFS
 - **Providing options for students to reach Bureau staff with questions on selecting an institution.**
 - **Posting SPFS publicly instantly upon submission.**
 - **Presenting the SPFS in multiple languages.**
 - Coordinating with other state higher education entities to **create a single web portal for students seeking college information.**
 - **Making the Bureau website a model of accessibility for students.**

Long-term, California and the Bureau would be best served if these data collection and reporting functions were managed, or at least coordinated, by a single state agency. This recommendation builds on prior recommendations made by various policy analysts, such as the Legislative Analyst's Office recommendations to improve workforce education and training data (Taylor, 2016). I propose creating a state agency that would be responsible for linking and managing various statewide data systems to understand state trends and needs. With such an agency, California could answer critical questions on state needs and policy effectiveness, including those regarding for-profit institutions. Californians do not live in the silos of state agencies.

Adopting these recommendations will not only increase the educational quality and attainment of Californians, particularly in the high-demand career-focused fields, it will promote the

economic stability, civic engagement, and social fabric of the state. Increasing an individual's educational outcomes provides both private benefits to that individual but also provides great public benefits to the individual's community – both locally and at the state-level.

Private Postsecondary Institutions are Critical for California's Success and Require Effective Oversight

California's economy depends on skilled labor. However, the supply of workers with associate and bachelor's degrees has been unable to keep up with demand (Johnson, Cuellar Mejia, & Bohn, 2015). Budget pressures on public higher education institutions have impacted their ability to meet enrollment demands, increasing demands on private institutions. Private for-profit institutions in California play a key role in promoting access to postsecondary education, enrolling between 13-19% of all undergraduate students (Jez, 2012). But high profile collapses of large for-profit institutions have increased scrutiny on their practices (Halperin, 2015).

California's Bureau for Private Postsecondary Education (the Bureau) aims to protect students and consumers through oversight of private institutions of higher education operating in the state. The Bureau's consumer protection focus is highlighted in its mission statement:

The Bureau exists to promote and protect the interests of students and consumers: (i) through the effective and efficient oversight of California's private postsecondary educational institutions, (ii) through the promotion of competition that rewards educational quality and employment outcomes, (iii) through proactively combating unlicensed activity, and (iv) by resolving student complaints in a manner that benefits both the complaining student and future students.

The state and the Bureau have operationalized this mission by ensuring that the state, students, and the public have the information necessary to understand the practices and stability of private postsecondary institutions and the education they provide. The Bureau receives this information via the reporting requirements in the annual report that each institution submits. Students, consumers, and the public receive this information via an institution's Student Performance Fact Sheet and catalog.

Reporting requirements are specific information from a specified reporting period related to the educational programs offered by an institution and the institution's general economic and educational situation. This information is submitted by the institution as part of an ongoing compliance program, such as the Bureau's annual report or an accrediting agency's regular review. Reporting requirements are an integral part of institution and program evaluation and allow overseeing entities to monitor and track institutional, program, and student progress. Ideally, regular reporting promotes institutional accountability and transparency to students and consumers while assuring a minimal level of educational quality.

Student disclosure information provides students and consumers with important information they can use to make decisions about an institution and its educational programs. Student disclosure information, which can take many forms, is often drawn from information submitted to meet reporting requirements. Two of the most common forms are a publication or fact sheet,

such as the Bureau's Student Performance Fact Sheet (SPFS), or a website, such as the U.S. Department of Education's Scorecard. In either form, this disclosure information ideally compiles relevant information in such a way that students and consumers find it easy to understand and to use to make informed decisions.

A TWO-FOLD FOCUS: REPORTING REQUIREMENTS AND STUDENT DISCLOSURE INFORMATION

To improve the quality of private postsecondary institutions in California vis-a-vis improved reporting requirements, I answer the following research questions in this report:

1. What reporting requirements are commonly used in the oversight of higher education institutions?
2. What is the efficacy of the various reporting requirements used in the oversight of higher education institutions?
3. What would be the most effective reporting requirements for the Bureau to adopt in an effort to meet the objectives stated in its mission?

To promote informed decision-making by students and consumers, I answer the following research questions in this report:

1. What metrics should be included in the Bureau's student disclosure information?
2. How should the Bureau provide student disclosure information to students and consumers?

Answers in this report to these critical questions will provide the Bureau with research-based recommendations to improve its reporting requirements and student disclosure information. Adopting the recommendations will not only increase the educational quality and attainment of Californians, particularly in high-demand, career-focused fields, but also help promote the economic stability, civic engagement, and social fabric of the state. Increasing an individual's educational outcomes provides both private benefit to that individual and great public benefits to the individual's community – both locally and at the state level.

ORGANIZATION OF THE REPORT

This report is organized as follows. First, I provide an overview of the study's research methodology. Then, I focus on reporting requirements – the Bureau's current requirements, the reporting requirements required by major higher education entities across the United States, and the reporting requirements the Bureau should use. In the next section, I focus on student disclosure information – the metrics the Bureau should give to prospective and current students and how they should be provided.

Overview of Study Methodology

To study the effectiveness of the Bureau's reporting requirements and make recommendations on improving the Bureau's student disclosure information, I first examined other major higher

education entities' reporting requirements – at both higher education institutions and at organizations to which these institutions report metrics. As directed by California legislation (cite) and the Bureau, I analyzed the reporting requirements of:

- California's public higher education segments
 - California Community Colleges (CCC)
 - Scorecard
 - California State University (CSU)
 - Common Data Set
 - University of California (UC)
 - Accountability Report
 - Common Data Set
- Prominent accrediting agencies
 - Accrediting Council for Continuing Education and Training (ACCET)
 - Accrediting Commission of Career Schools and Colleges (ACCSC)
 - Distance Education Accrediting Commission (DEAC)
 - Western Association of Schools and Colleges (WASC)
- California Student Aid Commission (CSAC)
- The U.S. Department of Education
 - Gainful Employment regulations reporting requirements
 - Higher Education Opportunity Act Title IV reporting requirements (Title IV), including the Integrated Postsecondary Education Data System (IPEDS)

See Appendix B for details on research methodology for identifying reporting requirements and links to documents used to gather entities' reporting requirements.

To identify which accrediting agencies' reporting requirements I should analyze, I requested guidance from the Bureau's chief, who recommended that I review the reporting requirements of ACCET, ACCSC, and DEAC, which I did. I also included WASC in the review, as institutions accredited by WASC receive approval to operate in California and do not need to undergo further review by the Bureau. I felt this signals that WASC does an adequate job with the institutions it accredits, so I wanted to see if its reporting requirements were distinct from those of other accreditors.

My examination was comprised of document analysis, expert interviews, and a review of the literature. I reviewed publicly available documents on each entity's reporting requirements and reviewed relevant research and reports on their reporting metrics, institutional accountability, and student disclosure information. My team and I then contacted representatives from each entity to review our understanding of the requirements and ask about the strengths and weaknesses of those requirements. (See Appendix C for sample interview protocol for interviews with entity representatives). We also asked representatives about students' college choice processes and student disclosure information. I interviewed other experts in the field, such as institution executives, researchers, student advocates, and innovators in student quality and data reporting. I asked them about best practices in reporting requirements and student disclosures. (See Appendix D for sample interview protocol for interviews with non-entity experts).

Using traditional policy analysis methods, I began with high-level categories of metrics identified in the Bureau's current metrics, metrics used by the above entities examined, and metrics (whether in implementation somewhere or not) identified in the expert interviews and review of literature. Once key categories were identified, I honed in on specifics of the metrics. Criteria by which to evaluate the metrics were culled from the Bureau, state legislation, and interviews with education and sector experts. One of the main criteria is effectiveness. As effectiveness has several components, I instead included the criteria that the Bureau chief and other interviewees indicated comprise effectiveness: usefulness, accuracy, consistency, and quality. I also analyzed metrics using the following criteria: Bureau administrative feasibility, institutional administrative feasibility, and technical feasibility. (For more information on the criteria, please see Appendix E). I rated each metric on each criterion and then compared their outcomes to each other. Based on their ratings, I made trade-offs to identify recommended reporting requirements for the Bureau.

Data sources

Student surveys (n=336)
Student focus groups (n=47)
Student Interviews (n=11)

Expert interviews and focus groups
(n=19; 7 for-profit institution executives, 4 public institution or agency administrators, 3 accrediting agency leaders, 3 student advocates, and 2 researchers with expertise in for-profit higher education)

Entity reports (n=13 sets of reporting requirements)
Existing research literature

To understand how students that attend for-profits make decisions about college and to help us make recommendations on student disclosures, we conducted student focus groups, interviewed students and sector experts, conducted a student survey (see Appendix F for details on the student survey methods, including student survey questions), and reviewed research to understand students' college choice processes. Through these methods, I developed an understanding of what factors students used to select a college, how they found and vetted information, what information they deemed useful in selecting a college, and their thoughts on the Bureau's Student Performance Fact Sheet (SPFS). I used this analysis to make recommendations on how the Bureau can best present students with the most accurate, useful, and consistent disclosure information.

Reporting Requirements in Higher Education

THE BUREAU'S CURRENT PRACTICE

Reporting requirements are widely used by various organizations to understand an institution's status. The Bureau currently requires institutions to submit an annual report. In the annual report, institutions "report various data pertaining to student enrollment, program cost, financial aid, degree offered and student performance rates." (Visit the Bureau's website to view institutions' annual reports: https://www.dca.ca.gov/webapps/bppe/annual_report.php). Institutions must also file with the Bureau a Student Performance Fact Sheet (SPFS) for each

program offered. (Visit the Bureau’s website to view institutions’ SPFS: https://www.dca.ca.gov/webapps/bppe/annual_report.php). The SPFS aims to provide students with key information on student outcomes in an institution’s programs. This information includes program cost, completion rates, graduate employment information, license examination passage rates, salary and wage information, and federal student loan information. Students must be given this information at the point of enrollment and initial each metric of the SPFS.

In July 2016, the Bureau revised the reporting requirements of the annual report and SPFS. This revision was mandated by statute (CEC section 94932.5 and 94941). Based on feedback from the public, including for-profit institutions and student advocacy organizations, the Bureau stated that it improved the “overall clarity, specificity, and consistency” of the regulations. (For details on changes, see Final Statement of Reasons at http://bppe.ca.gov/lawsregs/uniform_fsor.pdf and adopted revisions at http://bppe.ca.gov/lawsregs/uniform_order.pdf).

However, neither institutions nor student advocates are satisfied with these reporting requirements. Institution executives stated they were burdensome, and student advocates claimed they were confusing to students and consumers. It is likely that no single set of requirements will ever satisfy all parties, but in this study, I seek to optimize the goal of the state in having effective reporting requirements that align the objectives of both institutions and students.

IMPROVING THE BUREAU’S REPORTING REQUIREMENTS

Reporting requirements across entities generally fell into four broad categories: institutional characteristics, program characteristics, student outcomes, and narrative information. An analysis of specific metrics used by the various entities – similarities and differences, along with considerations highlighted in research or in the expert interviews conducted – follows, along with the metrics that I recommend the Bureau should report. (Please see Appendix G for details on each entity’s reporting requirements).

However, I propose a shift in the way the Bureau collects reporting requirements. I recommend that the Bureau collect student-level data and compute the metric calculations itself. This initially will increase the workloads of the Bureau and of the institutions it oversees but, in the long run, their workloads will likely be lower than current levels. I make this conclusion based on the practices of the CCC system. Experts, including interviewees from the CCC, indicated that having the community colleges send student-level data to the CCC Chancellor’s Office actually reduced the workloads of the Chancellor’s Office and the community colleges. This counterintuitive finding stems from the Chancellor’s Office not having to educate the many colleges, with their frequently-changing staff, on how to calculate the various metrics. Moreover, by receiving student-level data, the Chancellor’s Office can ensure the calculations are accurate and consistent. Finally, acquiring the colleges’ student-level data allows the Chancellor’s Office to match them with other data sources to get even more information on students, such as earnings, industry of employment, CalWORKs activity, apprenticeship status, and transfers. If

student-level data is collected by the Bureau, the Bureau should also require institutions to report if students are unable to complete their programs, obtain employment, or sit for a licensure exam if they meet the following: death, disability that makes them unable to achieve the outcome, military service, continuing education at least half-time (for employment), or incarceration.

Institutional Characteristics

In this section, I review reporting requirements that describe institutional characteristics:

- foundational institutional characteristics;
- financial indicators;
- legal, regulatory actions, audits, or investigations; and
- faculty.

Basic Descriptive Institutional Characteristics

Some institutional characteristics were commonly reported across the various entities analyzed. These common metrics included:

- name
- address
- website URL
- course catalog URL
- name of president/CEO
- owner of institution (and percentage of ownership)
- award levels offered
- mission statement
- institutional branch information
- satellite locations
- institutional accreditors (for each branch and satellite campus and programmatic accreditation)
- institutional contact information
- how the institution is legally established (e.g., corporation, non-profit, publicly traded)
- institutional control or affiliation
- conference associations and related information
- non-traditional credits
- services and programs for military service members and veterans
- academic calendar

The U.S. Department of Education requires that institutions participating in Federal Student Aid Programs include their policies for withdrawal and transfer of credit. Other entities may require this information, but it may not be a requirement to report it annually, like Title IV institutions must do.

Recommendation for the Bureau

I recommend that the Bureau maintain its current practice in the collection of this information, which largely mirrors the practice of other entities.

Institutional Financial Indicators

Understanding an institution's financial position is essential to ensuring that it can continue to provide services to students. Little consistency exists in the range or type of financial indicators required by the entities analyzed. WASC and the U.S. Department of Education (for Title IV institutions) require the most information on institutional revenues, expenses, and balance sheets. The UC Accountability Framework provides some financial data, but significantly less than WASC and Title IV requirements do. The national accrediting agencies require very little or nothing in their annual reporting requirements for member institutions. However, these data may appear in the financial reviews they conduct through a different process.

Best practices indicate that these financial data should be independently audited (ideally by an accounting agency as a part of the institution's regular financial review) and, for data publicly disclosed, the metrics should be compared to those of similar institutions. Moreover, the metric on percentage of tuition spent on instruction was noted as an important measure of institutional focus. This statistic is currently reported in the IPEDS data.

Recommendation for the Bureau

Since about half of the institutions overseen by the Bureau participate in Federal Student Aid Programs and submit financial data to IPEDS, I recommend that the Bureau model its financial indicator requirements on what many institutions are already compiling and submitting to IPEDS. However, the categories of financial data that for-profits submit to IPEDS are significantly broader than the financial data submitted by public and non-profit institutions. I propose that the Bureau require for-profit institutions to break down the reporting of their financial data the way non-profit and public institutions report their financial data to IPEDS. To ease the burden on institutions and to enable them to build reporting capacity, the Bureau could start this process by requiring for-profit institutions to report the same data they currently report to IPEDS, with further data disaggregation happening in future years.

Best practices indicate that these financial data should be independently audited and that a threshold (likely in the range of 70-90%) should be set for how much of an institution's revenues should come from federal or state funding sources, such as federal or state financial aid or education benefits for members of the military. Even better would be to set a threshold for the percentage of students who receive financial aid from state or federal funding sources, rather than on the percentage of revenues from these sources. I echo this recommendation.

In disclosures, the Bureau should provide context for these figures. This can be done by comparing institutions to similar institutions. Dollar-to-dollar figures are not comparable, but the Bureau can create indicators, such as the percentage of revenues spent in a specific category,

and provide comparisons for those indicators. IPEDS creates such indicators, and these could be mirrored for Bureau institutions.

Legal, Regulatory, and Accreditor Actions, Audits, and Investigations

Legal and regulatory actions, audits, and investigations can have a huge impact on institutions, including closure of an institution. ACCET and ACCSC require institutions to report any legal complaints, actions, or investigations being conducted, and WASC requires institutions report “adverse actions” taken by other accrediting agencies. ACCET and ACCSC ask institutions to provide information if any of the below instances is true:

- complaints, legal actions, judgments, or involuntary liens have been filed against the institution;
- reviews/audits have been conducted by any state agency, the federal government, or any accrediting agency; or
- investigations are ongoing by any state or federal agency.

Other entities analyzed do not require institutions to report legal actions, complaints, judgments, investigations, audits, or similar activities.

Recommendation for the Bureau

Given the impact that legal and regulatory actions, audits, and investigations can have on an institution, it is critical that the Bureau require institutions to report this information. Currently, the Bureau only requires institutions to report final disciplinary action by an accrediting agency. Three major accrediting agencies already require that a wider range of actions, audits, and investigations information be reported, and I recommend that the Bureau follow their lead and require institutions to report any legal or regulatory complaints, actions, or investigations that have occurred in the past five years.

Program Characteristics

Program Offerings and Information

Almost all entities require institutions to list programs offered, but they differ in the amount and type of information required to be reported. ACCSC requires a comprehensive amount of information on each program, including enrollment, credit hours, tuition, and student performance information. Slightly less comprehensive, DEAC requires institutions to report enrollment, credit hours, and credit type, and it also asks about any substantive changes to programs, including new programs or the discontinuation of existing programs. Even less comprehensive, ACCET requires institutions to report the class schedule, number of program completions, and student participant hours. Similarly, the U.S. Department of Education requires that institutions report to IPEDS the number of program completions, level of award, field (CIP code), and student charges by program. For Gainful Employment regulations, the U.S. Department of Education requires institutions to provide names, CIP codes, credential level, and student completions for each program. Other entities only require a list of programs offered. The UC Accountability Report and the CCC Scorecard did not require any program-level information.

The use of CIP codes (with award level) by WASC and the U.S. Department of Education simplifies comparing programs across institutions.

Recommendation for the Bureau

I recommend that the Bureau require institutions to report a comprehensive amount of information on each program offered, including enrollment, credit hours, tuition, and student performance. Programs should be identified not only by name but also by 6-digit CIP code to assist when program names may not be discerning enough, and also in comparing programs. Currently, this information is largely captured in an institution's student catalog, but it would be useful to include this information with other reporting requirements to provide the Bureau with a single source of data from the institutions.

Costs to Students

The cost of a program for students is an important metric, particularly given the Bureau's consumer protection function. ACCET, DEAC, CSAC, and the CCC Scorecard do not require institutions to report student costs and, as of 2016, WASC no longer requires this, but the other entities analyzed have at least one metric that measures cost to the student. The U.S. Department of Education requires institutions with programs falling under Gainful Employment regulations to report the cost to students – who complete a program (in normal time) – of tuition, fees, room and board, and books and supplies. ACCSC also requires institutions to provide costs to students by program and delivery method (online or in-person). Other entities require institutions to report annual student costs.

What is included in student costs varies. At the minimum, costs include tuition and fees. Other metrics (for ACCSC, IPEDS, and Title IV) include additional costs typical for a student, such as necessary books and supplies, room and board, and transportation.

Entities vary in how they disaggregate student costs. The U.S. Department of Education requires institutions participating in the Federal Student Aid Programs to disaggregate these data by full-time and part-time students and by living arrangement. Other entities (IPEDS, UC) note the net price to students, in other words, the costs to students after accounting for financial aid. The UC and CSU Common Data Set break out in-state and out-of-state tuition costs in its annual expenses calculation.

Best practices indicate that entities should focus on requiring institutions to report the most realistic student costs possible. This would serve two main purposes. First, student cost metrics would include all costs students typically face in their program, even if the institution itself is not charging for some of them. Examples of these costs include room and board, books, parking expenses, and even childcare. Most entities require institutions to report typical expenses for traditional students, but for-profit colleges, since they enroll older students, must re-think what their students' typical expenses are. These typically required costs usually do not include childcare, but more institutions are recognizing that this is a growing budget item for students – even at traditional comprehensive universities. Second, student cost metrics should be realistic

by also accounting for student financial aid. An institution's listed tuition and fees (commonly referred to as its "sticker price") may not be paid, either partially or entirely, by a typical student. Some entities have recognized this and require institutions to report their net price, or cost, after accounting for financial aid awards.

Recommendation for the Bureau

The entities that require student costs to be reported aim to include all the costs students face, whether some are paid to the institution or not. Institutions that participate in the Federal Student Aid Programs already report these data to the U.S. Department of Education. Considering the burden on institutions, I recommend that the Bureau require institutions to report the same data on student costs that they send to the U.S. Department of Education. This would include all costs typically paid by a student in each program, the same information that institutions send to IPEDS. Understanding costs actually paid by students, I recommend that the Bureau require institutions to report the net price to students, which is what IPEDS asks institutions to report.

To reduce the burden on institutions, I propose that they report disaggregated student costs rather than calculate a total cost. This has the additional benefit of providing greater information to the Bureau, as the delineation of various costs may aid in understanding the effectiveness of an institution.

In future years, I recommend that the Bureau analyze which costs are typical for students at each of its institutions. The typical student budget was created to reflect the needs of traditional students who are 18-22, single and without children, living on campus, and without full-time employment – in other words, students who are different than many of those who attend for-profit institutions. Once the typical budget for students attending the institutions the Bureau oversees is better understood, I recommend that the Bureau require institutions to report these costs and provide budgets for students of varying profiles. For example, UC and CSU provide student budgets for students living both on and off campus. The Bureau should seek to understand the students at the institutions it oversees and create budgets that illuminate their typical costs.

Student Characteristics

Understanding student characteristics helps to provide a more detailed picture of an institution. Understanding whether most students at an institution work full time, whether they depend on financial aid, or whether they require enhanced educational supports provides context for other reporting requirements. For example, it would be reasonable to expect that an institution that enrolls students with lower levels of academic preparedness will have lower levels of program completion than an institution that enrolls students with higher levels of academic preparedness.

ACCET, DEAC, Title IV, and CSAC do not require institutions to report data on the characteristics of the students enrolled. Other entities, however, often require institutions to report on student characteristics in the following categories: race and ethnicity, gender, age,

income (UC requires parent income, too), and academic achievement, qualifications, attainment, and college readiness.

Less commonly required student characteristics include residency, migration of first-time freshmen, and disability (required by IPEDS); geographic origins and hours worked (required by the UC Accountability Report); receipt of Title IV financial assistance, Title IV Pell grants, Title IV loans, and non-title IV assistance, such as WIA, Vocational Rehabilitation, state grants, and VA benefits (required by ACCSC). ACCSC also requires an institution to provide information on the demographic characteristics of its community or region, such as the unemployment rate and median household income. Institutions pull these data from the U.S. Bureau of Labor Statistics and the U.S. Census Bureau.

Recommendation for the Bureau

To best understand the context in which an institute operates, I recommend that the Bureau require institutions to report data on the characteristics of students enrolled, such as academic preparedness, hours worked, disability, race and ethnicity, age, gender, income, and receipt of financial assistance. (Each of these metrics is currently collected by at least one of the entities analyzed for this report).

Moreover, the market for institutions is very local, so it would be useful to have data that provide context about an institution's surrounding community. I suggest that the Bureau either have each institution report, or collect, on its own, data on the unemployment rate and household income of its community or region. The large number of institutions accredited by ACCSC already report these data, which they pull from the U.S. Bureau of Labor Statistics and the U.S. Census Bureau.

Student Outcomes

Retention/Persistence and Withdrawal

The California Student Aid Commission, CC Scorecard, IPEDS, UC and CSU Common Data Set, and UC Accountability Report require institutions to report retention data (also called persistence data), but the period of time that the student has to persist varies. The CC Scorecard measures persistence as attendance for three consecutive semesters or four consecutive quarters, but IPEDS and the UC and CSU Common Data Set take a snapshot of persistence after one year (a snapshot from the start of one fall term to the next).

Some entities require the reporting of retention by student population. For example, the UC and CSU Common Data Set disaggregate retention rates for first-year and transfer students, while IPEDS disaggregates data based on students' full-time or part-time status. CSAC requires the reporting of retention rates for Cal Grant recipients.

Some entities also frame retention from the reverse angle – student withdrawals. ACCSC and DEAC do not require retention data, but instead require institutions to provide data on the

number of withdrawals from the institution (allowing for the calculation of retention when combined with the number of students who began a program). DEAC also requires institutions to report why students withdraw: employment in a profession related to the education program, employment in a profession unrelated to the education program, transfer to another accredited institution, active duty military service, inability to demonstrate satisfactory academic progress, financial reasons, personal reasons, other, or unknown.

The only entity that does not require the reporting of retention or withdrawal data is ACCET.

While no entity requires institutions to meet a minimum benchmark, the UC Accountability Report and the U.S. Department of Education's online Scorecard provides, for context, retention and withdrawal information from comparison institutions and the national average for all institutions.

Recommendation for the Bureau

Understanding student retention and withdrawal is useful, but given the short length of many for-profit programs, retention and withdrawal metrics provide little additional information over graduation metrics. As such, I do not recommend that the Bureau require institutions to report student retention or withdrawal metrics. Instead, I suggest that it focus on providing meaningful graduation data, which is discussed next.

Completion

Completion is the goal of every student and, as such, it is an important metric to require. However, how to meaningfully capture completion is not straightforward. Every entity requires that institutions report completion rates, but the metrics vary. Typically, completion is measured as graduation, but entities also include other metrics that may be considered completion, such as transferring to another institution and graduating there, or withdrawing to participate in training-related work.

Graduation rates are measured at different points in time. Entities typically require institutions to report graduation rates at 100% of the scheduled graduation time, which is also called normal time and published program length. Some entities also required institutions to provide graduation rates for students who graduate later, such as within 150% or 200% of the scheduled graduation time or after a set number of years.

Who is included in graduation rate calculations also differs. For example, IPEDS only includes full-time students enrolled for the first time, which likely excludes many students who attend the institutions the Bureau oversees. DEAC excludes active duty military, medical or other approved leaves, and deaths from graduation rate calculations.

In addition to graduation rates, ACCET also includes a metric it calls "completions" that measures the number of students who graduate plus the number of students who dropped out of the program but were placed in training-related employment. DEAC institutions must also

report the number of graduates who left and continued their education at another accredited institution and the average amount of time students needed to complete a program.

Some entities require institutions to maintain a minimum graduation rate. For institutions to receive state aid, CSAC requires them to maintain a graduation rate above 30% for students who graduate within 150% of the expected time to graduate. ACCET requires institutions to have a completion rate of 67%. Recognizing that completing a shorter degree is more likely than completing a longer degree, ACCSC varies its minimum by program length. (See Table 1 below).

Table 1. ACCSC varies graduation rate benchmarks by program length.

Program length (months)	Average rates of graduation (demonstrates acceptable student achievement)	Standard deviation	Established benchmark for graduation rates
1-3	92%	8%	84%
4-6	84%	11%	73%
7-9	72%	12%	60%
10-12	69%	14%	55%
13-15	65%	14%	51%
16-18	62%	15%	47%
19-23	60%	18%	42%
24+	55%	19%	36%

Source: ACCSC 2013 Annual Report Review

DEAC bases the minimum graduation rate it sets for its institutions on the average graduation rate for the institution’s peer group. Institutions may not fall more than 15 percentage points below this average. Similarly, the UC Accountability Report compares institutions’ graduation rates to those at similar institutions. This report also includes graduation rates for freshmen who graduated from a non-UC campus.

While these benchmarks provide a clear threshold of quality, experts interviewed noted that high-stakes measures that institutions control, such as graduation rates, can be manipulated.

Recommendation for the Bureau

Given that it is important to understand how many students complete their programs on-time (in the time frame advertised by their institution), I recommend that the Bureau require institutions to report on-time graduation rates. Understanding that students, for various reasons, may not complete their programs on time, I also propose that the Bureau require institutions to report the average amount of time it takes students to complete and the percentage of students who have completed at that point in time.

In the student interviews, focus groups, and surveys, students said they wanted to know an institution’s graduation rates and why students there do not graduate. They explained that understanding why students do not complete their programs would help them make decisions

about which program and institution to attend and how to prepare to be more academically successful. As such, I propose that the Bureau require institutions to report why students do not complete and recommend the use of DEAC's categories for non-completion: employment in a profession related to the education program, employment in a profession unrelated to the education program, transfer to another accredited institution, active duty military service, inability to demonstrate satisfactory academic progress, financial reasons, personal reasons, other, or unknown. The Bureau should also require institutions to report the percentage of non-completers for each of these categories.

I also propose that the Bureau set a benchmark for completion rates based on completion rates in similar programs at other institutions.

Licensure Examination Passage Rate

Institutions may prepare students for careers in fields where passing a licensure exam is required. As such, entities may require institutions to report the success of students in passing these exams. However, this metric is not commonly reported in annual reports. Only ACCSC requires institutions to provide this information. ACCSC institutions must also report the number of graduates, number of graduates taking the exam, number of graduates passing the exam, and percentage of graduates who pass the exam. Moreover, ACCSC requires institutions to report the passage rate for that exam for all students who took it (not just those at that institution) to provide context on the passage rate.

A passage rate metric that is based on all graduates, whether or not they take the licensure exam, reduces the ability of institutions to manipulate this metric. Interviewees noted that institutions may discourage lower-performing students from taking the exam if the metric is based only on those students who take the exam.

Recommendation for the Bureau

Passing the licensure examination for a career field should be a clear signal that the student is prepared for that career. For this reason, I recommend that the Bureau continue its practice of requiring institutions to report licensure exam passage rates for students in programs that prepare them for careers in fields where licensure is necessary. However, I suggest that the Bureau base this rate on the number of graduates rather than on the number of graduates who take the exam. This way, institutions are encouraged to prepare all graduates to be successful on the exam. Based on interviews with students and experts, it is unlikely that students who complete a program that prepares them for a job in a field that requires a license would not want to acquire a license and practice in that field.

The Bureau should set a benchmark for licensure exam passage rates based on the licensure exam passage rates of similar programs.

Job Placement/Employment

Entities focused on career training institutions tend to require these institutions to report student job placement, or employment, rates. ACCET requires institutions to maintain detailed information on each student about his or her subsequent training-related employment, including company information, job title, and type of employment (e.g., self-employment, part-time, temporary, continuing). DEAC requires similar information, however, it also collects information on employment not related to the student's training. ACCSC requires the reporting of the number of graduates and non-graduates employed in fields both related and unrelated to their training. The UC Accountability Report reports the industries that employed their graduates, a fuzzier estimation of the employment that, for example, would show graduates worked in health but not whether they were doctors, janitors, or accountants.

Entities differ on who is included in placement and employment metrics. Some entities, such as the U.S. Department of Education Title IV participation guidelines and the Gainful Employment Reporting and Disclosure Requirements, ask institutions to report only on their graduates, while others also require metrics on students who did not graduate. Also, entities may only calculate placement rates for students available for employment, typically excluding students who are in the military, incarcerated, disabled, or deceased.

While many entities simply require institutions to report counts of students employed or provide information on each student from which counts and rates could be calculated, other entities require institutions to calculate rates on their own. Entities that require placement rates to be reported often provide guidance on how rates may be determined, such as by suggesting the methods of the institution's accreditor, state agency, or the National Center for Education Statistics; the collection of data through surveying students and alumni; or the use of a state data system that could supply, for example, employment data from state unemployment insurance records.

Two entities set a benchmark for placement rates. ACCSC states that the average rate of employment demonstrating acceptable student achievement is 76% with an 8% standard deviation, with 68% being its established benchmark employment rate. ACCET set its placement benchmark at 70% and allows for up to 15% of students to declare that they do not want placement assistance (meaning they would be excluded from the calculation).

WASC, IPEDS, and the UC and CSU Common Data Set do not require institutions to report job placement or employment data.

Recommendation for the Bureau

See combined recommendation for job placement and wages in the Wages/Earnings section that follows.

Wages/Earnings

Many entities require institutions to report wage data for graduates. The CCC, CSU, and UC track students' actual earnings by using state unemployment insurance earnings data. Use of unemployment insurance earnings data excludes earnings from military or federal government jobs, self-employment, out-of-state jobs, and those who do not report earnings; these data also cannot discern the number of hours worked. For instance, low earnings may be due to an employee working few hours or being paid a low wage. The CCC reports median wages by program or college. The UC Accountability Report reports average alumni wages by selected majors.

ACCSC reports the average starting salary for graduates, which is an estimate by the institution of the potential annual starting salary of a graduate employed in a training-related field. CSAC requires only career-training programs or programs that make claims about job placement to report wage information. It allows institutions to either self-report these data or to use CCC's methods.

Some entities also report wage data for non-graduates. CCC reports changes in wage data for non-graduates who take career technical education courses called *skills builders* to maintain or build their knowledge and skills.

DEAC, ACCET, WASC, and the U.S. Department of Education (Title IV, IPEDS, or Gainful Employment) do not require institutions to report wages in their annual report.

Recommendation for the Bureau

Students reported that they attended for-profit institutions because job training and landing a good-paying job was a top priority. As such, job placement and wages metrics should be obvious reporting requirements. However, the lack of an accurate, consistent, and technically feasible way to measure job placement and, to a lesser extent, wages, makes this requirement difficult to recommend.

The current best alternative to understanding job placement and wages is to use the same system that California public institutions use – relying on state unemployment insurance data. This would require institutions to send the Bureau the Social Security Number (SSN) of each student, and the Bureau would work with the California Employment Development Department (EDD) to provide data on students' earnings and industry of employment. As discussed above, these data have drawbacks – not all workers are accounted for, occupation is not provided, and hours worked is unknown. Despite these shortcomings, the data available are useful, accurate, consistent, and reduce the administrative burden that institutions experience having to gather these data on their own. I recommend that the Bureau require institutions to report the Social Security numbers of all students, which can be used to gather earnings data and related information on industry of employment from EDD. By collecting these data for all students, the Bureau can provide information on wage changes, as is done by the CCC, from before and after students graduate or otherwise leave the program (notably, the CCC has identified that the non-

completers – it calls them skills builders – have strong wage returns despite not completing their programs). As more educational institutions rely on EDD data, the institutions can provide feedback to EDD and the state legislature on how EDD data could be improved for statewide data-based decision making.

In the future, the Bureau should consider approaching the state or federal treasury to use income tax data. These data would provide earnings data for all students if federal treasury data are used or all Californians if state treasury data are used and provide self-reported occupation information. State treasury data have not been used for this purpose in higher education in California, but, at the federal level, treasury data are being used by researchers to estimate returns to higher education and by federal regulators for the Gainful Employment requirements.

To provide context for the metrics, the Bureau should set a benchmark for employment rates and an average for earnings based on the employment rates and earnings of students from similar programs.

Student Loan Debt/Default/Repayment

Entities often require institutions to report metrics related to student loan-taking, such as student debt amount, default rates, repayment rates, and debt-to-earnings ratios. However, it appears that some entities review these types of data during the institutions' review of financial records rather than requiring that institutions provide these data in their annual reports.¹ For example, ACCET and DEAC do not require these data in their annual reports, but the data may be included in the annual review of financial records.

ACCSC, IPEDS, Gainful Employment regulations, and the UC Accountability Report provide student debt metrics. ACCSC, IPEDS, and Gainful Employment regulations require institutions to disaggregate the types of financial aid students receive, including student loan debt and their funding sources (e.g., Title IV loans, private loans, and institutional loans). However, IPEDS only requires this to be reported for full-time, first-time degree or certificate-seeking students, which excludes large numbers of for-profit students. The UC Accountability reports graduates' debt burden by discipline.

Other metrics required were student loan default rates (ACCSC and CSAC), student debt repayment rates (Gainful Employment regulations), and student debt-to-income ratios (Gainful Employment regulations). Due to the time lag before a student is characterized as having defaulted, and because of the ability of institutions to manipulate default rates, expert preference exists for requiring the reporting of repayment rates over default rates.

¹ To make clear, in this analysis I focus on the reporting required in institutions' annual reports, but some of the reporting of these types of data is being done in other processes required by the entities, such as in reviews of financial records. While this reporting is important, it is functionally different than the annual reporting requirements that we focus on in this study.

The UC Common Core Data Set and the CCC Scorecard do not require the reporting of student debt and related metrics.

Some entities set benchmarks for student debt and related metrics. CSAC requires that institutions participating in the Cal Grant program maintain a three-year cohort default rate of less than 15.5%. Gainful Employment regulations require institutions to maintain students' annual loan payments so that they do not exceed 8% of their total income and 20% of their discretionary income. ACCSC sets a comparative standard, stating that it will compare its institutions' student loan default rates to legal or regulatory standards and will also examine any institution with a rate that has increased significantly.

Recommendation for the Bureau

There are a myriad of metrics around student debt that the Bureau could require. Based on my analysis, I recommend that the Bureau require institutions to report student debt levels, repayment rates, and debt-to-earnings ratios for graduates and non-completers. I do not recommend that the Bureau require institutions to report default rates. I suggest the reporting of student debt levels because it is a clear metric that students understand immediately. Moreover, it is necessary to have this metric to calculate a student's debt-to-earnings ratio, which is a well-documented and commonly-used metric for determining the financial stability of an individual. Finally, I propose that the Bureau require institutions to report repayment rates. This metric also is useful to students and easier for students to grasp than default rates. Most students we spoke with did not understand what default rates were – in fact, many thought having higher default rates was. However, the Bureau's ability to access student debt information is currently unclear.

Student Satisfaction

DEAC is the only entity that requires institutions to report student satisfaction in their annual reports. It surveys students in the 10 programs with the largest enrollment. It also uses student satisfaction benchmarks that were created based on similar courses or programs in other DEAC institutions. DEAC requires institutions to have a student satisfaction rate of 75 percent or above.

Other entities, such as ACCSC and the UC, survey students, but none as a part of requirements for annual reporting.

Recommendation for the Bureau

In my analysis, student satisfaction rated high on usefulness, but trade-offs between cost to the state and technical feasibility, accuracy, consistency, and Bureau and institutional administrative feasibility must be faced depending on who administers the survey. Having a third party, such as Gallop², administer and analyze student satisfaction surveys increases technical feasibility, accuracy, consistency and administrative feasibility but also increases the cost to the state. If

² Gallup conducts surveys for states to understand graduate satisfaction. For example, see <http://www.gallup.com/services/187001/bridging-gap-higher-education-workplace-colorado.aspx>

the state could support such a survey being conducted by a third party, I would recommend such an effort. It would provide useful information for both state oversight and for consumer decision making. Otherwise, I do not recommend that the Bureau require reporting on student satisfaction.

Narrative Information

Not all information is quantitative or suitable to simple qualitative metrics. Institutions may have substantive changes or issues not adequately captured in the metrics listed above. Recognizing this, DEAC requires institutions to provide a narrative to explain substantive changes (change in name or mission, new or closed programs, swings in graduation rates or other metrics), to describe issues perhaps not adequately captured in the quantitative metrics, or to provide more context for quantitative metrics.

No other entities required institutions to provide narrative explanations.

Recommendation for the Bureau

I recommend that the Bureau require institutions provide narrative information to explain substantive changes or issues not adequately captured in the metrics reported. This allows institutions to provide context for their reporting, thereby building a greater understanding of an institution's operations. Moreover, I suggest that the Bureau require institutions to report any substantive changes when they occur. I envision these mid-year narratives to be similar to the Form 8-K statements required by the Securities and Exchange Commission for publicly traded companies. (For more information on Form 8-K, see <http://www.sec.gov/answers/form8k.htm>).

Institutions subject to numerous but similar reporting requirements

Across the entities examined, I found that institutions were required to calculate different but similar metrics for each of the requesting organizations. For example, California Community Colleges are required to submit data for state reporting requirements, plus student Social Security numbers for other state reporting metrics, along with different metrics for their accrediting agency, and additional metrics for federal Gainful Employment regulations and HEOA Title IV participation. Not only do the reporting requirements differ, but so do deadlines and methods of submitting data, increasing the burden on institutions to compile and submit the required data and metrics. This has led institutions to create institutional research departments focused simply on compiling compliance analytics, a situation that limits the institutions' ability to focus on research to improve educational quality.

For-profit institutions, however, operate differently than public institutions and represent 47% of HEOA Title IV institutions.³ As such, the criteria by which best practices in reporting requirements are determined may be different for California for-profit institutions. My recommendations take into account the unique focus of these for-profit institutions, the students they educate, and the Bureau's goals.

³ Author's calculation based on 2014-2015 IPEDS data.

PROCESS MATTERS

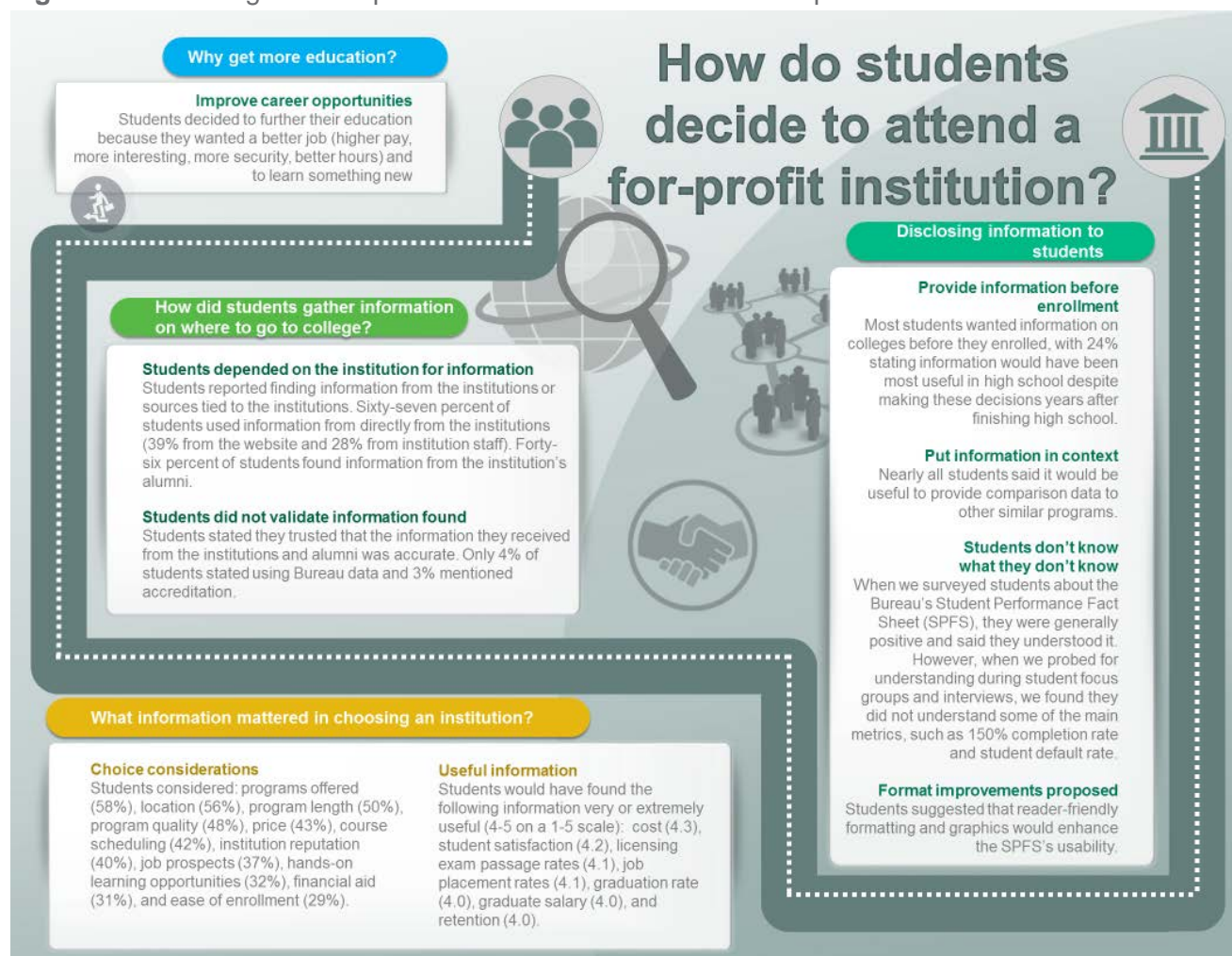
While this study did not focus on the process of how reporting requirements are collected, reviewed, and the actions taken based on those reporting requirements, I acknowledge the important process that happens after annual reports are submitted. I recommend that the Bureau continue making the annual reports publicly available and in a format that is accessible to analysts (such as the Excel spreadsheet). I encourage the Bureau to continue this practice and focus on making these reports available immediately after they are submitted.

How Should the Bureau Provide Students with Disclosure Information?

The Bureau aims to provide students with useful and accurate information from which students can make informed decisions about which college to attend. While much is known about the college choice process of students who attend public and non-profit four-year colleges, less is known about the process of students who attend for-profit colleges. Students at for-profit colleges tend to be older, lower-income, working, independent from their parents, focused on career training, minority, and female. To better understand their decision-making process, we surveyed students who attend for-profits, conducted student and expert interviews, and held focus groups. I analyzed the student interviews, student focus groups, and surveys, along with the sector expert interviews and focus groups, and also explored the limited relevant research to understand what factors these students use to select a college, how they find and vet information, what information they deem useful in selecting a college, and their thoughts on the Bureau's Student Performance Fact Sheet. I used these analyses to make recommendations for the Bureau on how it can present students with accurate, useful, and consistent disclosure information. For details on the research methodology, see Appendices D (expert interview sample protocol) and F (student survey questions).

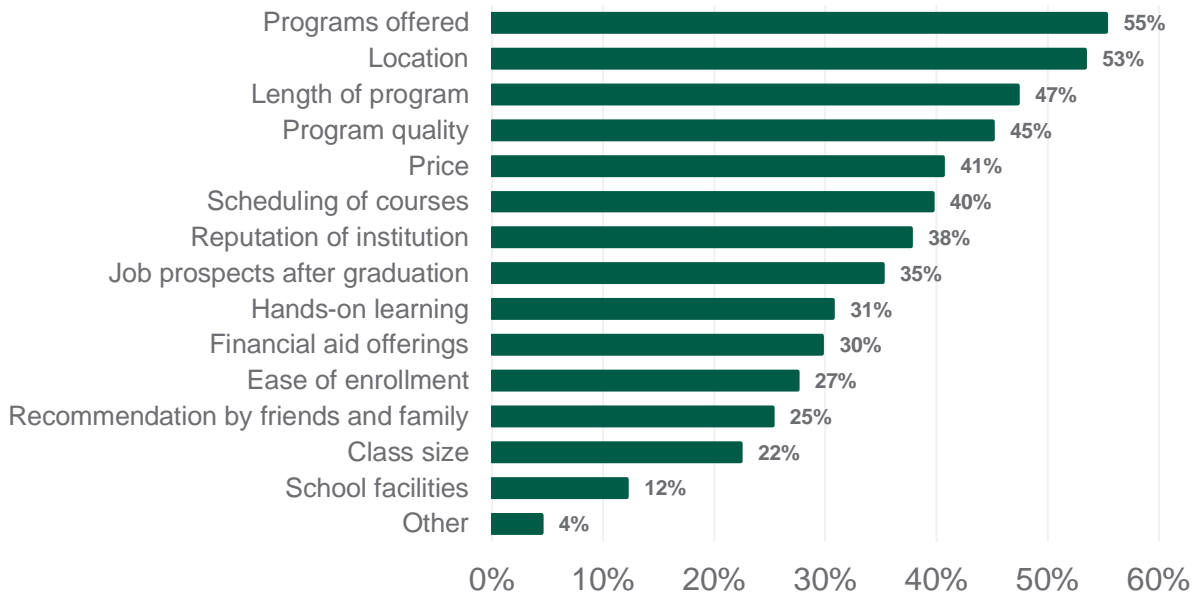
From the survey of students enrolled at for-profit institutions, I found commonalities in their college search information sources, the information they used, and the information they wished they had known. (See Figure 1 for a visual overview of the findings).

Figure 1. The college-choice process for students who attend for-profit institutions



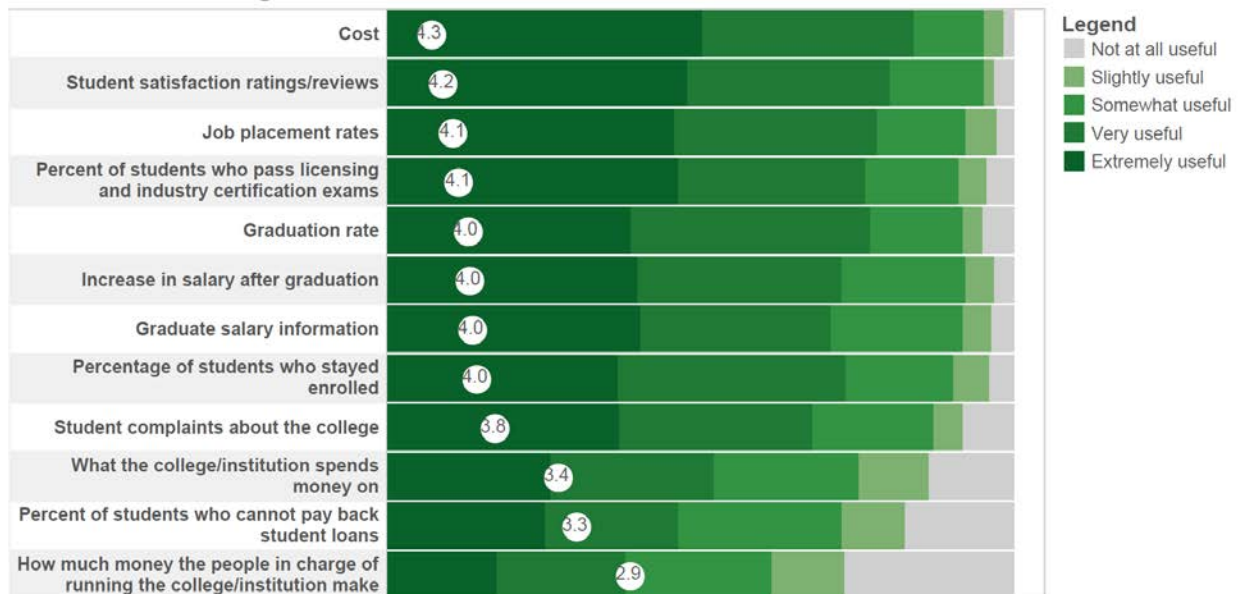
To acquire information, students depended heavily on the for-profit institutions themselves and their alumni. They trusted the information that was provided and rarely validated it with a disinterested party. Students most frequently reported considering program offerings, location, program length, price, and course schedule in selecting an institution (see Figure 2).

Figure 2. What did you consider when you chose your institution? Check all that apply.



The survey also asked students what information would be useful to them as prospective students. While students reported that everything listed after the survey question would be useful, they rated cost and student satisfaction as being most useful (see Figure 3).

Figure 3. How useful would the following be to you as a prospective student? Check all that apply.



When presented with the Bureau’s Student Performance Fact Sheet (SPFS) and asked about the information provided and its layout, students had generally positive responses. The survey asked students for three words to describe the SPFS. Two-thirds of the words in their answers

were positive, 18% were negative, and 16% were neutral. Students frequently said the SPFS was “numerical,” “informative,” and “factual.” When we interviewed students and conducted student focus groups, students were similarly positive and said the SPFS was useful. However, when we asked students to explain what the SPFS said, they realized they did not understand the information. In fact, we could not find one student who interpreted the 150% completion rate correctly or understood what the student default rate meant. Some students even felt that defaulting was positive, that higher default rates were a good characteristic.

The survey also asked, in an open-ended question, what information should be provided on the SPFS. While many students said nothing or not applicable, other students listed metrics already on the SPFS, such as graduation rates and licensing exam passing rates. However, students suggested new metrics, too: job opportunities, cost, detailed information on the program (such as coursework and class style), length of program, financial aid information, student reviews, and comparisons to other schools. In a similarly open-ended question, the survey asked if there was anything additional that would help students make good decisions about college. Students largely said nothing or mentioned data already presented. However, some new metrics were mentioned. The most common ones were comprehensive cost information that would include costs for items not typically listed, such as course materials and exams, along with a comparison of the cost of the program to anticipated income after graduation. In other words, students wanted key information about the institution in a single document.

The survey also asked about the format and design of the SPFS and how to make disclosure information more accessible. While about a quarter of the students said they did not have any recommendations for improving the clarity of the SPFS, other students suggested making the document more reader-friendly in design, listing different formatting, the addition of graphics and the elimination of unnecessary information.

WHAT METRICS SHOULD THE BUREAU PROVIDE TO STUDENTS?

Consensus existed across students, experts, and existing research on what information students need and should have. The desired metrics included information on:

- Program characteristics
 - Location
 - Length of program
 - Price/cost to student ____
 - Course schedule
 - Size of program and class size
- Student outcomes
 - Job prospects/placement rate
 - Licensure exam passage rate
 - Graduation rate
 - Earnings/wage (increase and absolute earnings figure)
 - Student retention

In addition to these metrics, students and experts noted other factors that students consider in selecting a college. Students mentioned student satisfaction, program quality, reputation, financial aid offerings, ease of enrollment, and an institution's facilities. Experts mentioned that students should understand which careers a program prepares a student for, and students felt it was important to disclose whether passing a licensure exam to practice in a particular field is required. Note that this is a departure from the Bureau's current practice of only providing data on outcome and performance. Students indicated they would prefer to have all pertinent information in a single document to make their search and choice process simpler.

Based on these findings, I next discuss which metrics I do and do not recommend that the Bureau provide in its student disclosures.

Program Characteristics

Location

The address of where the program is offered should be included in the student disclosure information. Moreover, the Bureau should use this information to provide appropriate comparison data for metrics that are best compared within a region, such as employment rates.

Length of Program

The Bureau should provide students with information about the program length based on on-time completion, but it should also give students a sense of whether completing studies in this time frame is common. To do so, I recommend that the Bureau draw from my recommended reporting requirements to report the average time to completion. Students are highly sensitive to the amount of time it will take to complete a program, so even a single class delay can be non-trivial, especially for short-term programs that are frequently offered by for-profit institutions.

Cost to Student

The cost of the program should reflect the typical costs a student will pay. As such, the disclosure information should take into account the financial aid students receive that helps offset costs, as well as all common expenses incurred by students in the program, such as materials, exam fees, and transportation. To estimate average annual cost, I recommend that the Bureau following the practice of the U.S. Department of Education's Scorecard by breaking down net price by income.

Course Schedule

Students need to know the schedule of the courses necessary in order to adequately compare programs at various institutions. As such, this program information should include a high-level description of the course schedule that includes the number of classroom hours per week, how frequently classes meet (for example, three times each week), and what time of day classes are held (for example, in the evenings).

Size of Program and Class Size

Students reported that program size and class size are important metrics in their decision-making process. I recommend that the Bureau include on student disclosures an institution's average program size and average class size for the past three years.

Student Outcomes

Job Prospects and Placement Rate

Overwhelmingly, students enroll at for-profit institutions to improve their career options, whether for a higher salary, a more interesting or stable career, or increased opportunities for promotions. While I would like to recommend that the Bureau provide students with information on job prospects, these data are difficult to measure well and consistently without undue burden on the Bureau or the institutions. I instead suggest that the Bureau provide students with alternative information that approximates information on job prospects. This can be drawn from the related recommendations on reporting requirements by using information provided by the California Employment Development Department (EDD). The EDD can provide employment rates for a large proportion of students. Moreover, earnings data can be used to provide guidance on how well graduates are doing, as many graduates would be fine with working out of the related training field if they are being well paid. As such, I recommend that the Bureau use EDD data to calculate employment rates for graduates. However, this information needs context. I suggest that, alongside the institution's rate, the Bureau note employment rates for similar programs at other institutions.

Even though I propose that the Bureau analyze industry of employment for its own oversight efforts, I do not suggest that it publish industry of employment data in the student disclosures. These data are too confusing and require too much interpretation to be very useful to students.

Licensure Exam Passage Rate

Licensure exam passage rates are an accurate and useful metric for students in their college choice process. I propose that the Bureau present the same reporting requirement I recommended above concerning the licensure exam passage rate. I also urge that the Bureau list not only the institution's licensure exam passage rate, but the passage rates for similar programs at other institutions.

Graduation Rate

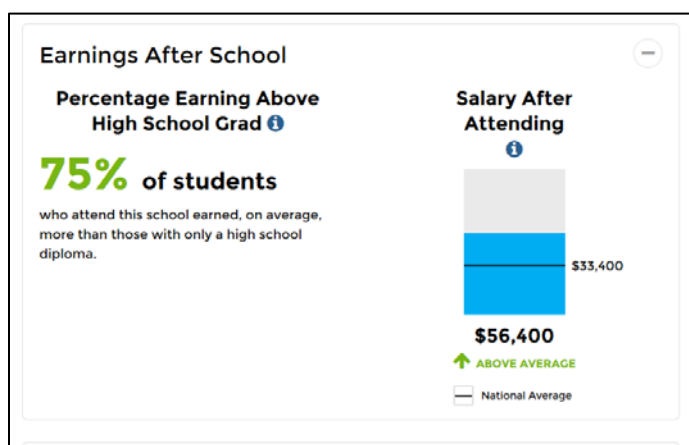
Students typically aim to graduate from the program they are enrolling in. As such, graduation rates should provide an indicator of the likelihood that a student actually will graduate. I recommend that the Bureau report on-time graduation rates, along with the average amount of time it takes students to complete the program and the percentage of students who have completed it by that point in time. To provide context, a program's graduation rate metrics at a particular institution should be accompanied by averages for similar programs elsewhere.

Earnings/Wages

I propose that the Bureau present the same reporting requirement I recommended above concerning EDD earnings data. These data need to be translated into a form that is accessible for students. I found that students tend not to think about earnings in terms of an annual salary, but instead as hourly wages. Unfortunately, EDD data only indicate total earnings, so there is no way to estimate hourly wages. What the Bureau could do to provide context is to compare an institution's projected earnings for graduates to earnings for graduates of similar programs at other institutions in the region.

Another metric that would prove informative for students is to mimic the U.S. Department of Education's Scorecard metric that reports the median earnings of former students and the percent of former students earning more than those with only a high school diploma (see Figure 4).

Figure 4. Screenshot of U.S. Department of Education's Scorecard: Percentage Earning Above High School Graduates



Student Retention

Students want information on student retention, but given the short length of many of the programs and the amount of information already in the disclosure, I do not recommend providing retention information. If anything, I propose that the Bureau instead provide the common reasons why students at a particular institution do not complete their chosen program.

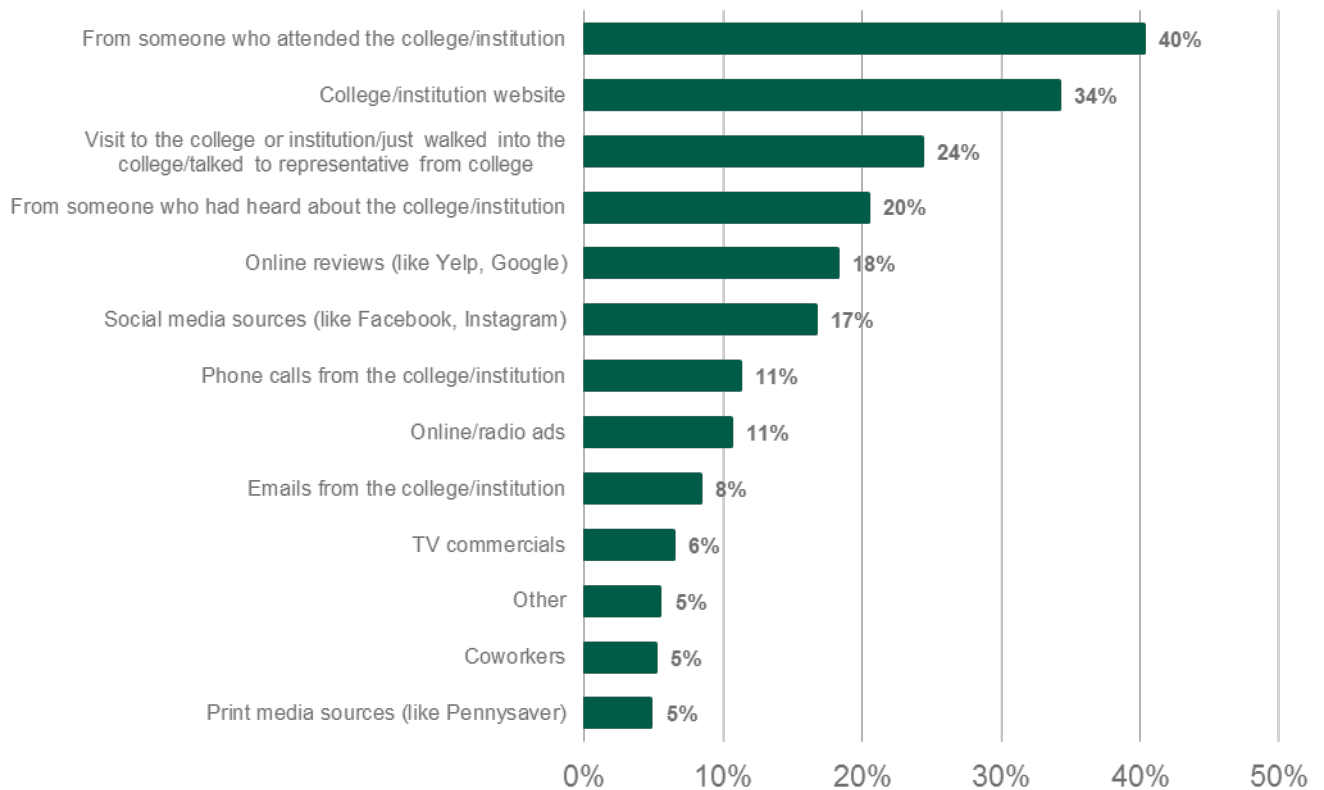
HOW SHOULD THE BUREAU PROVIDE THAT INFORMATION TO STUDENTS?

Determining which metrics students need most is only the first step in providing effective student disclosure information. The disclosures must be accessible to students – located where students will find them and presented in a way that helps students understand and use the information to make decisions. In this section, I first discuss where students find information for their college search and how they determine which information is reliable. Next, I discuss how the information should be provided to students.

Where Should Student Disclosure Information Exist?

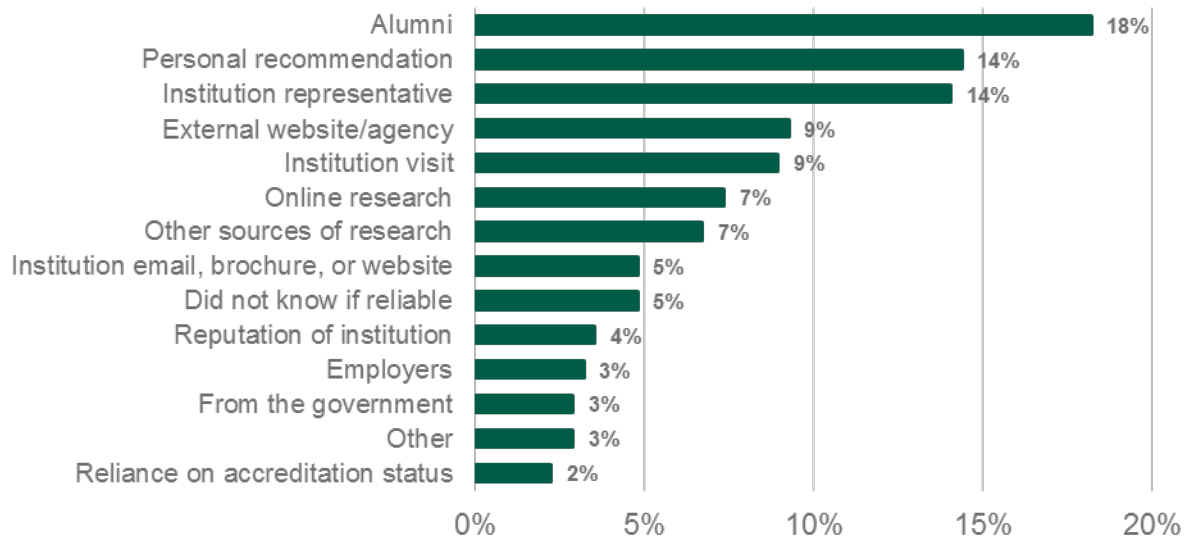
Students reported finding information on colleges largely through individuals who attended those institutions and from the institutions' websites (see Figure 5). Other popular ways students found college information was by visiting a college or meeting with a representative of the college, by talking to someone who had heard about the institution (but was not an alumnus or employee of that college), or through online reviews or social media sources.

Figure 5. Where did you find information when making your decision? Check all that apply.



Students did little to validate the information they found with a third party with no investment in the institution being considered (see Figure 6). They frequently stated that they talked to someone they deemed trustworthy and reliable, and that was how they validated the information. However, this person was often someone affiliated with the institution – such as an alumnus or a representative of the institution – who may not have unbiased, rigorous information. To validate information, students very rarely sought the institution's Student Performance Fact Sheet or information from an accrediting agency

Figure 6. How did you know that this information was reliable, trustworthy, legitimate, real? Check all that apply.



As such, I recommend that the Bureau focus on ensuring that student disclosures are prominently displayed on each institution’s website and that the staff at those institutions understand their important role in conveying student disclosure information. The Bureau could do so by providing an institution’s staff with professional development courses on how to understand and discuss the disclosures or by having staff provide students with a user-friendly copy of the disclosures.

The Bureau should also consider coordinating with other state higher education entities to create a single online portal for students seeking information on colleges. Currently, higher education entities in California maintain separate websites for students seeking information. I propose that the Bureau begin this conversation by connecting with CSAC about its CaliforniaColleges.edu website, which has a void for students seeking an education for certain careers. This particularly true for older students who wish to return to college but discover they do not fit into any of the categories for prospective students – middle school student, high school student, college student – listed on the site.

While few students likely visit the Bureau’s website during their college-hunting process, the Bureau should make its website a model of accessibility for students. Just as institutions should make the SPFS centrally located and easy to find, the Bureau should do the same with its website. Moreover, the Bureau website should have a function that helps students find a program. Given students’ propensity to stay close to home, I recommend that students be able to search online for programs based on distance from a zip code. The Bureau could then provide other filters. Ideally, this search would lead students to a very simple visualization of programs that meet their search parameters. The U.S. Department of Education’s Scorecard is an example of a clear college search tool that the Bureau could replicate.

How Should the Information be Disclosed to Students?

The Bureau requires institutions to post on their websites Student Performance Fact Sheets (SPFS) for all of their programs. While students are required to sign the SPFS and initial each

metric, most students reported that they did not rely on the current form of the SPFS to make an enrollment decision, and only about half of students surveyed remembered seeing the SPFS at all. However, students did indicate that having such information would be useful, and they made suggestions on how to improve the usefulness of the SPFS. To promote the use and usefulness of the SPFS, I make five main recommendations:

- make the information simpler and more compelling;
- provide the information at the right time (earlier);
- back up the SPFS with personal support;
- make the SPFS public immediately; and
- provide the SPFS in multiple languages.

Make the Information Simpler and More Compelling

[Connect the Dots for Students](#)

The SPFS currently provides multiple columns of actual counts of students for each metric, and the final column typically provides the calculated rate for the given metric, such as graduation rate. Students found all the numbers overwhelming and confusing. I recommend that the SPFS only provide the rates or the final calculation. While providing the numbers demonstrates how small many programs are and, thus, how susceptible they are to large swings in outcomes due to one or two students in a given program, no student we talked to took that away from the SPFS. In fact, we did not talk to one student who could explain the SPFS to us without significant guidance (and this was after students had seen it and signed it).

I recommend the Bureau provide only the final rate graphically, with a graphical comparison to similar programs in the region, and a clear declarative statement interpreting the information, such as “76% of students in this program graduated on time, compared to 46% at similar programs in the region.”

[Standardize the Format of the SPFS](#)

Ideally, students would use the SPFS to compare programs within and across institutions. But even if students do understand the information on the SPFS, the lack of a standardized format for the SPFS makes it difficult for them to compare programs.

To promote the clarity of the SPFS and to ease students’ ability to use it to compare institutions, I urge the Bureau to create a required format for the SPFS. If the Bureau follows my recommendation that it calculate rates for institutions, the Bureau could create program SPFS for the institutions and the institutions would simply publish the Bureau-created SPFS.

[Increase Accessibility of the SPFS on Institutional Websites](#)

Since most students that attend for-profits do not go there directly from high school, the Bureau has the challenge of reaching students that are not under any single organization’s radar. Knowing that students commonly use the institution’s website as a source of information, I recommend that the Bureau continue requiring institutions to publish their disclosure information. However, the Bureau should work with institutions to make Student Performance

Fact Sheets more accessible on their websites – both location wise and in terms of wording and design. Institutions tend to put all accrediting and government compliance documents on the same page, often with wholly accurate but decidedly unappealing titles, such as “accrediting and government compliance documents.” Furthermore, for a prospective student that does follow that link, the SPFS is a PDF document, which poses an additional barrier as it requires the student to download the document and have the software to open it.

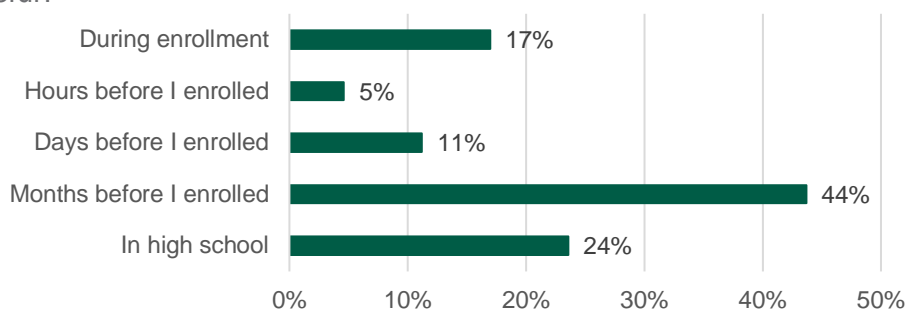
To increase accessibility, I recommend that the Bureau make the SPFS more distinctive in appearance from other disclosure documents and require the SPFS integrate it into institutional webpages so that students do not have to download a separate document. I further urge the Bureau to require institutions to put SPFS information on the first page of the given program’s information.

Provide the Information at the Right Time

“The Performance Fact Sheet should be like the document you pick up first thing at the open house, not that you look at when signing mortgage papers.” – Sector expert

Many students reported not seeing the SPFS until they were completing enrollment documents, but the SPFS is aimed at helping students earlier, when they are making decisions about institutions. Seeing the SPFS upon enrollment is too late. Students reported that they would have rather had this information much earlier in their search – perhaps even in high school, but definitely at least a month before college enrollment (see Figure 7). The task of targeting students who plan to attend for-profits is difficult, since they tend not to be in high school, where they can easily be targeted during their college search and selection process.

Figure 7. When would the information in the Student Performance Fact Sheet be the most useful?



Link the SPFS with Financial Aid Applications

Since many students who attend for-profit institutions apply for financial aid, the Bureau could provide disclosure information when students submit a financial aid application. If students apply for financial aid for only one institution and do so close to the start of the term, indicating that they have not shopped around for a school or been made aware of their options, the Bureau could require them to talk to an advisor. This advisor could be a staff member at the Bureau, or

the Bureau could partner with CSAC to build on CSAC's already large program that works directly with student financial aid applicants.

Increase Connection with High Schools

Even though students at for-profit institutions are older, they still reported they would have benefited from this information in high school. As such, I recommend that the Bureau work with high schools to train administrators, teachers, and counselors to understand the postsecondary option of attending for-profit institutions and prepare them to direct students to the Bureau's disclosure information and teach them how to understand it.

Back Up the SPFS with Personal Support

Students consistently noted how important personal support was for them during the college choice process. They typically found this support at the college they ultimately enrolled. While institutions know themselves better than anyone else, they are not neutral sources of information. Moreover, the Bureau itself relies on institutions to be messengers of the SPFS. This makes sense, since students turn to their institutions for information, but this also may be because the Bureau's website is not user-friendly and because statewide college information sources tend to ignore career-focused postsecondary institutions. I recommend that the Bureau aim to be the primary source of information for students, rather than the institutions themselves. The Bureau could do this by providing a modern version of a hotline for prospective students. Taking cues from the way businesses provide customer service, this hotline could take the form of Bureau social media accounts (such as Twitter or Facebook) that address student questions, a toll-free advising number (similar to the Learn More Indiana website that provides college and career advising online at <http://www.learnmoreindiana.org/> and via phone at 1-888-528-4719), or a chat feature on the Bureau's website.

Make the SPFS Public Upon Submission

Students and consumers depend on timely information. The data that institutions need time to compile is already several months old by the time it is submitted to the Bureau. In past years, Student Performance Fact Sheets were due in the September of the following year. Starting in 2016, the SPFS due date became even later, in December. In other words, 2015 data is due in December 2016 – making it a year old by the time it is seen by prospective students. The Bureau already provides this information to consumers relatively quickly once it receives it from institutions, but given how much time institutions have to submit data to the Bureau, I recommend that this information be published by the Bureau even faster – the Bureau could have institutions upload their data, which becomes instantly available on the Bureau's website. The Bureau already puts up a disclaimer before one can access the annual reports stating: *The Bureau publishes the information provided in the links below as it was submitted by the institution, and does not endorse, recommend, or favor any institution whose information is published or provided.* As such, the Bureau should simply publish the reports as they are submitted rather than processing reports prior to publishing them – and encourage institutions to submit their SPFS documents as soon as they can, rather than waiting until the December deadline.

Provide the SPFS in Multiple Languages

Currently, the SPFS is only available in English. However, many students cannot read English. Even in the sample of students for this study, we came across multiple institutions that indicated that their students cannot read English and, as such, could not complete the survey. If the Bureau creates a standardized template for the SPFS, it could be provided in multiple languages with no change of wording needed each year other than to update the metrics.

A LOSING BATTLE AGAINST OPTIMISM BIAS

Like everyone, students fall victim to optimism bias. They believe they are less likely to face negative events than other people. This bias makes it difficult for them to change behavior as the result of reading disclosure information. We frequently heard students dismiss low student performance rates for institutions where they were enrolled or would like to enroll. If only 1% of students completed an award, students felt that they would be in that 1%. Research indicates that attempts to address optimism bias only serve to enhance it. While the Bureau should continue to promote and improve its disclosure information, it should depend more heavily on other aspects of its regulatory powers in order to promote informed decision-making by students and consumers.

Recommendations for Information Gathering and Disclosure for Improving Private Postsecondary Education

“Are students graduating? Passing licensure exams? Getting jobs? Paying back loans? Hitting all four is a good indication of a successful experience for school and student.” –Accrediting agency executive

Private postsecondary institutions are vital to California’s educational and economic prosperity. Collecting the right data is essential to ensuring that the state can effectively oversee these institutions. In this study, I analyzed how higher education entities nationwide report and collect information for oversight and disclosure. I also interviewed, surveyed, and conducted focus groups of higher education experts (including institutional executives, accreditors, public agency leaders, student advocates, and scholars) and students to understand which reporting requirements the California Bureau for Private Postsecondary Education (the Bureau) should collect, what information should be disclosed to students and consumers, and how this information should be disclosed.

Below, I summarize key recommendations, first on reporting requirements and then on student disclosures. Regarding reporting requirements, the Bureau should:

- **Collect student-level data from the schools and calculate key metrics itself**, a practice that likely will only increase for a short time the workload of the Bureau and the institutions involved. This change would allow the Bureau to match student-level data with that in existing state databases, resulting in more accurate, complete, comparable, and consistent data. Moreover, this shift in process would alleviate some of the

Bureau's workload, as it would no longer have to spend significant resources educating institutions on how to calculate the various metrics.

- **As relevant, publish benchmark information from similar institutions or programs alongside institutional and program data.** This would provide context useful for students, consumers, institutions, and other stakeholders.
- While this study focused on the metrics themselves, and not on what happens after institutions submit data, it is difficult not to acknowledge that critical process. The Bureau should **continue to make annual reports publicly available and in a format accessible to analysts** (such as the Excel spreadsheet). The Bureau should consider posting the reports immediately after they are submitted, as the disclaimer on the Bureau website indicates they are not reviewed prior to posting.
- **Institutional characteristics**
 - **Model financial indicator requirements** after the U.S. Department of Education IPEDS requirements for Title IV compliance. Many institutions already submit these data to IPEDS, so simply build on that. In the long-term, I recommend requiring that institutions submit financial data to reflect the more disaggregated categories of financial data that non-profit and public institutions submit to IPEDS. This would promote greater transparency and comparability across institutions. Moreover, the Bureau should create indicators that aid in the comprehension of the indicators, such as percentage of revenues spent in a specific category.
 - **Require that institutions report legal, regulatory, and accreditor actions, audits, and investigations.**
- **Program characteristics**
 - **Collect comprehensive information on an institution's programs**, including enrollment, credit hours, tuition, student performance, and six-digit CIP code.
 - **Require disaggregated total costs faced by students**, whether or not they are paid to the institution. In the long term, I recommend that the Bureau conduct a study to understand what costs are typical for students at the institutions it oversees and require institutions to report these costs and provide budgets for students of varying profiles.
 - **Gather a wider range of information on enrolled student characteristics**, including academic preparedness, hours worked, race and ethnicity, gender, disability, and income. Moreover, the Bureau should collect information on the context of an institution's community, such as its unemployment rate and household income.
- **Student outcomes**

- **Due to the short length of most programs, do not require student retention or withdrawal rates.** Instead, focus on providing meaningful graduation data.
- **Require data about on-time graduation rates,** so students and consumers can understand how many students at an institution complete their degrees on time. Also, require that **institutions report why students do not finish.**
- **Continue its practice of requiring institutions to report licensure exam passage rates.**
- Using student-level data submitted by the institutions, work with the California Employment Development Department (EDD) to **obtain state unemployment insurance data for job placement and earnings.** EDD already provides this information for the UC, CSU, and CCC.

In the future, the Bureau should consider approaching the state or federal treasury to use income tax data to **obtain more comprehensive earnings data for students and occupation information.**

- **Obtain metrics on student debt levels, repayment rates, and debt-to-earnings ratios** for graduates and non-completers. Discontinue the required reporting of student default rates, which are not understood by students.
- Use the expertise of an independent organization to **survey students about their level of satisfaction** with their program. If the state cannot support independent surveying, I do not recommend that the Bureau require reporting on student satisfaction.

- **Narrative information**

- **Direct institutions to provide a narrative** to explain substantive changes and issues not adequately captured in the metrics reported. Additionally, require institutions to immediately report any substantive changes that occur mid-year, the way the Securities and Exchange Commission requires such information be reported on its Form 8-K by publicly-traded companies.

To reduce institutions' burden, many of the recommendations mirror the existing practices of other entities, particularly IPEDS. This helps the approximately half of institutions that the Bureau oversees. However, the other half of institutions will need support to transition to the recommended metrics. Moreover, these institutions are likely to be smaller and with less capacity for change. To address their needs and smooth the transition, I suggest the Bureau target its efforts to provide additional support the institutions that do not participate in the Federal Student Aid programs.

The second set of recommendations concerns the student disclosure information that the Bureau provides. Focusing on what information students should have and how this information should be provided to them, I suggest that the Bureau:

- Broaden the information students should have to **include information beyond performance metrics.**
- **Provide program characteristics of importance** to prospective students, including location and length of program, cost to student, course schedule, size of program, and class size.
- **Present information about student outcomes**, including job prospects and placement rates, licensure exam passage rates, graduation rates, former students' earnings and wages, and why students do not complete their programs.
- **Promote the use and usefulness of the SPFS** by:
 - **Making the information simpler and more compelling**
 - **Provide just the key data metric**, not the calculation of the metric.
 - **Offer a graphical representation of the information**, not just a table with the data.
 - **Give a graphical comparison to similar programs in the region with a clear, declarative statement interpreting the information.**
 - **Standardize the format of the SPFS.**
 - **Increase accessibility of the SPFS on institutional websites.** Consider integrating the SPFS into an institution's website page and onto the first page of its program information, rather than posting the SPFS as a PDF that must be downloaded.
 - **Providing the information at the right time**
 - **Link the SPFS with financial aid applications.**
 - **Increase connections with high schools** to ensure that high school faculty, staff, and administrators can effectively counsel students on using the SPFS.
 - Given the importance of personal support to students, **providing options for students to reach Bureau staff with questions on selecting an institution.**
 - As SPFS are not reviewed by the Bureau prior to posting, **posting them publicly and instantly upon submission.**
 - **Presenting the SPFS in multiple languages.** Many students do not speak English and cannot make use of the English version of the SPFS. A standard template could be used to create the SPFS in multiple languages with no change of wording needed each year other than to update the metrics.

- Coordinating with other state higher education entities to **create a single web portal for students seeking college information.**
- **Making the Bureau website a model of accessibility for students,** one that institutions will seek to replicate. A search mechanism, for example, could be added to help students find programs near them.

These changes will require some heavy lifting by the Bureau and support from its various stakeholders. However, these changes, in sum, support the goals of the Bureau, the needs of students and consumers, and the interests of the institutions. My recommendations ensure that the Bureau will receive the data it needs to act as an effective consumer protection agency. The suggestions on reporting requirements promote the receipt of accurate, consistent, and useful information. They reduce the burden on institutions by having the Bureau take responsibility for making calculations and reporting. Students and consumers will benefit by receiving improved protection services from the Bureau. This would be the result of the Bureau improving institutional information and enhancing disclosure information through improvements to the data published and the format used in publishing them.

Long-term, California and the Bureau would be best served if these data collection and reporting functions were managed, or at least coordinated, by a single state agency. This builds on prior recommendations made by various policy analysts, including the Legislative Analyst's Office suggestions to improve workforce education and training data (Taylor, 2016). I propose creating a state agency that would be responsible for linking and managing various statewide data systems to understand state trends and needs. This agency would help create common measures and promote the use of a statewide model to understand workforce development. It would have a focus larger than just education – it would integrate education data with other state data, such as income, social services, apprenticeships, workforce development, and licensing data. With such an agency, California could answer critical questions on state needs and policy effectiveness, including those about for-profit institutions. Californians do not live in the silos of state agencies. As such, it is critical that California looks to integrate its various data systems to promote the well-being of its residents through informed decision making.

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Appendix A. Excerpts from the Bureau Request for Offer for Reporting Requirements Study

STATE OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
REQUEST FOR OFFER (RFO)

RFO No. BPPE-15-1
Reporting Requirements Study

The California Bureau for Private Postsecondary Education (Bureau) is the entity responsible for the licensing and regulation of private postsecondary institutions operating in the state of California.

As part of the compliance program, private postsecondary institutions operating in California are subject to submit an annual report to the Bureau for each educational program. In the annual report, institutions are required to report various data pertaining to student enrollment, program cost, financial aid, degree offered and student performance rates. In general, these reports submitted to the Bureau are made available to students and the public as disclosures.

The Bureau is tasked by the legislature to evaluate the effectiveness of the Bureau's current reporting requirements and identify opportunities for improvement (California Code of Regulation (CCR) section 94929.9). As part of the evaluation, the Bureau shall explore the reporting requirements of other Higher Education entities and assess their effectiveness. Specifically, the following entities' reporting requirements must be researched and evaluated: United States Department of Education, the Student Aid Commission, accrediting agencies, student advocate associations, and the public postsecondary institutions in California.

To meet the requirement of the legislature, the Bureau is seeking a consultant to evaluate the efficacy of the various reporting requirements from the above-mentioned entities and make recommendations on what would be the most effective reporting requirements and whether those methodologies should be adopted.

Ultimately, the consultants' goal is to determine how the Bureau can better serve the students with accurate, useful and consistent disclosure information. This study shall be written in a manner that is clear, concise, and would be comprehensible to industry professionals, including institution representatives, student advocacy groups, Bureau staff, members of the legislature, and the general public.

...

A. The Contractor shall provide the services as described below.

The Contractor shall perform an analysis on the effectiveness of the Bureau's current reporting requirements including the Student Performance Fact Sheet. Be sure to point out whether the current requirements are designed to measure the quality of an institution's education.

The Contractor shall perform an analysis on the effectiveness of other entities' reporting requirements referenced in CEC section 94929.9. Specifically, these entities are: United States Department of Education, the Student Aid Commission, accrediting agencies, student advocate associations, and the public postsecondary institutions in California. Be sure to point out requirements that generally accepted as best practices, standards and/or processes.

The Contractor shall make recommendations to the Bureau on what would be the most effective reporting requirements and whether those methodologies should be adopted.

The Contractor shall make recommendations on how the Bureau can better present students with accurate, useful and consistent disclosures information.

Appendix B. Reporting Requirements Research Methodology

The reporting requirements of annual reports and other annual submissions were chosen as the metrics of interest for this study, as they most closely mirrored the Bureau's reporting requirements. Background materials detailing reporting requirements were gathered from entity websites and interviews with experts. Various sources were used for each entity, including annual report forms, annual report instructions, and entity handbooks. The most current documents within the timeline and scope of the research were used. Specific sources are detailed below.

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Appendix C. Entity Interview Sample Protocol

Goal of interview is to understand their reporting requirements, thoughts about the Bureau's reporting requirements

INTRODUCTION

My name is Su Jin Jez. I'm an associate professor of public policy and administration at California State University, Sacramento. My work focuses on research, policy analysis, technical assistance, and evaluation within and across K-12 and postsecondary education. As I mentioned in my email, the Bureau has asked me to examine the effectiveness of their reporting requirements, with a particular interest in their student disclosures. When I say "reporting requirements," I mean information that must (or should) be shared in order for students, parents, and other stakeholders to understand an institution's effectiveness – basically the most important indicators of an institution's quality and integrity.

As a part of the study, I am interviewing experts like you with extensive experience working with higher education institutions on metrics used for accountability and public disclosure.

While my team and I will analyze the transcripts of the interviews and write summaries of what we've learned, I will not use your name, title, or any other identifying information about you when I report the findings. I will anonymize all information about interviewees. I have many questions to ask you, so I will try to keep the discussion on topic to be sensitive to your time.

That's a very brief summary of the work. Do you have any questions about the study?

I would like to record our conversation so that I can listen to you completely and not take a lot of notes. Is it OK if I turn on the recorder now? Thank you.

Any questions for me before I begin?

OVERVIEW OF AGENCY REPORTING REQUIREMENTS

1. Can you tell me about your agency's reporting requirements?
2. What is your agency's goal in requiring institutions to report these metrics?

DETAILS ABOUT REPORTING REQUIREMENTS

Great. I'd like to ask you some detailed questions about your reporting requirements. Based on The preliminary research, we've found [insert main findings].

1. Can you tell me what data you use?
 - a. Is it self-reported by institutions? Is it from a third-party?
 - b. Any concerns about the data?
2. How do you calculate each metric?
 - a. Any concerns about the measurement?
 - b. Is this method typical?

3. Do you think you're using the right metrics? Why or why not?
 - a. What metrics do you think are the most essential?
4. Do you believe these measures ensure "quality"?
 - a. If so, how? If not, why not? How do they ensure quality?

STUDENT USE OF METRICS

5. Do you disclose this information to students?
 - a. If so, how?
 - b. Do you think students use this information? If so, how? If not, why not?
 - c. How do you promote the accessibility of this information?

WRAPPING UP

6. Do you know of any generally accepted best practices, standards, and/or processes for reporting requirements?
7. Is there anything else I should understand as I make recommendations to the Bureau on its reporting requirements and student disclosures?

Appendix D. Expert Interview Sample Protocol

Goal of interview is to understand their thoughts about the Bureau's reporting requirements

INTERVIEW BACKGROUND

My name is Su Jin Jez. I'm an associate professor of public policy and administration at California State University, Sacramento. My work focuses on research, policy analysis, technical assistance, and evaluation within and across K-12 and postsecondary education. As I mentioned in my email, the Bureau has asked me to examine the effectiveness of their reporting requirements, with a particular interest in their student disclosures. When I say "reporting requirements," I mean information that must (or should) be shared in order for students, parents, and other stakeholders to understand an institution's effectiveness – basically the most important indicators of an institution's quality and integrity.

As a part of the study, I am interviewing experts like you with extensive experience working with higher education institutions on metrics used for accountability and public disclosure.

While my team and I will analyze the transcripts of the interviews and write summaries of what I've learned, I will not use your name, title, or any other identifying information about you when I report the findings. I will anonymize all information about interviewees. I have many questions to ask you, so I will try to keep the discussion on topic to be sensitive to your time.

That's a very brief summary of the work. Do you have any questions about the study?

I would like to record the conversation so that I can listen to you completely and not take a lot of notes. Is it OK if I turn on the recorder now? Thank you.

Any questions for me before we begin?

EASING IN

1. Can you tell me about the reporting requirements you'd like to see the Bureau require?
2. What would be the goal of having these metrics reported?

ABOUT THE BUREAU'S REPORTING REQUIREMENTS

Great. I'd like to ask you some detailed questions about these reporting requirements. Some of it is pretty technical – feel free to take a pass on any question. Based on the preliminary research, we've found [insert main findings].

3. Can you tell me what data you would like to see the Bureau use?
 - a. Is it self-reported by the institutions? Is it from a third-party?
 - b. Do you have any concerns about the data?
4. How should the Bureau calculate each metric?
 - a. Any concerns about the measurement?

- b. Is this method typical?
- 5. Do you think the right metrics are being required? Why or why not?
 - a. What metrics do you think are the most essential?
- 6. Do you believe these measures ensure “quality”?
 - a. If so, how? If not, why not? How do they ensure quality?

STUDENT USE OF METRICS

- 7. Should the Bureau disclose this information to students?
- 8. If so, how?
- 9. Do you think students use this information? If so, how? If not, why not?
- 10. How should the Bureau promote the accessibility of this information?
- 11. What do you think students should know and understand to make informed decisions about where to go to college?
- 12. How do you think students make decisions about where to go to college?

WRAPPING UP

- 13. Do you know of any generally accepted best practices, standards, and/or processes for reporting requirements?
- 14. Is there anything else I should understand as I make recommendations to the Bureau on its reporting requirements and student disclosures?

Appendix E. Criteria Used to Evaluate Metrics

I used criteria identified by the Bureau, legislation on reporting requirements, and information from experts in the interviews. One of the main criteria was effectiveness. As effectiveness has several components, I have instead included the criteria that in the interviews indicated effectiveness: usefulness, accuracy, consistency, and quality. Criteria are defined and discussed below.

USEFULNESS

As student disclosure data will be drawn from the reporting requirements, along with other sources as necessary, the Bureau's statement that it wants potential students to "actually get the information they need to make a decision to attend or not to attend that institution..." means that the reporting requirements should include information useful for student decision-making. However, it is difficult to know what information students need to know. We asked students and experts this question, however this is only their perception and may not be what they actually need to know. Also, what students need to know varies and is based on each student and program. A student with financial constraints will need to know program costs, but a student without financial constraints will not. A student who wants to become a registered nurse will need to know if the program prepares graduates for the licensing examination, but a student seeking to become a medical assistant does not need to know licensing information.

Given how individualized usefulness is, I operationalize this construct as: Could a student make a well-informed decision about attending an institution without this metric? If not, the metric is considered useful. Depending how well-informed the student would be with or without the metric determines how useful the metric is.

ACCURACY

This criterion measures how much the metric measures what it intends to measure and is not able to be manipulated. Simply put, a graduation rate metric should measure the rate at which students in a given program successfully complete the program. Metrics that are accurate would rate higher than others.

CONSISTENCY

This criterion measures how consistent the metric is across colleges and time. Metrics that are more consistent across colleges and time would rate higher than others.

ABILITY TO MEASURE QUALITY

This criterion measures how well the metric captures the educational quality of an institution. Metrics that are more directly able to measure quality would rate higher than others.

THE BUREAU ADMINISTRATIVE FEASIBILITY

This criterion measures how feasible it is for the Bureau's to administer the metric given its current capacity. Metrics that increase the Bureau's workload or require a high level of expertise would rate lower than others.

INSTITUTIONAL ADMINISTRATIVE FEASIBILITY

This criterion measures how feasible it is for a typical institution to administer the metric. Metrics that increase an institution's workload or require a high level of expertise would rate lower than others.

TECHNICAL FEASIBILITY

This criterion measures how easily the metric can actually be created and operationalized. Metrics that would be difficult to create or operationalize would rate lower than others.

Appendix F. Student Survey Methodology and Survey Questions

DETAILS ON STUDENT SURVEY SAMPLING METHODOLOGY

Initially, 34 Bureau for Private Postsecondary Education institutions from six regions in California were chosen for the student survey. They were selected based on their size as determined by enrollment (less than 100 students, 100-500 students, and more than 1,000 students) and urbanicity (urban or rural). Recruitment of institutions was done using a three-touch over 10-day system that involved two emails and a follow-up phone call. The initial email included a letter of introduction about the study's purpose and provided contact information. A follow-up email was a request for response. The phone call followed the script of the invitation letter. For the institutions that wanted to see the survey prior to agreeing to participate, a preview survey was sent out via email. Eleven of the 34 institutions agreed to participate, requiring recruitment of additional institutions. More institutions were identified to help the survey maintain representation by region, institution size, and urbanicity, and recruitment was completed using the same three-touch system of contact. Ultimately, 26 institutions received in-person visits, again with a close eye on ensuring the representativeness of the sample of institutions. The researcher provided the introduction letter, a handout for the institution, and flyers for students with a link to the survey. By request, presentations by the researcher to describe the survey and pass out the flyers were given to students at two institutions.

Ultimately, 40 institutions that were representative of the state agreed to participate in the survey. Of the student respondents who identified their institutions, 31 institutions were noted (still comprising a representative sample). At the close of the survey, 336 students had participated in the survey.

TEXT OF THE SURVEY ADMINISTERED TO STUDENTS

Thank you for your willingness to take this survey and have your voice be heard.

Understanding how students think about education is very important. It helps the government better support students to be successful in their careers. The state of California knows how important this is and has hired us, a team of researchers at California State University, Sacramento, to help it better understand the students it serves at private colleges and programs.

Completing this survey will make sure your voice is heard! Tell us why you decided to attend your college/institution and what information should be provided to help future students make

this decision. There are no right answers, and this is not an evaluation of you or your college/institution – we just want to let the state know how to best meet the needs of students.

Everything you tell us is anonymous, so we do not know who you are.

To say thank you to survey participants, we will hold a drawing and give away twenty \$20 Target gift cards after the survey closes. You will have an opportunity to register for the drawing to win one of these gift cards at the end of the survey.

If you have any questions about the survey or the study, please contact California State University, Sacramento Professor Dr. Su Jin Jez, at jez@csus.edu or 916-278-5955.

Thank you for participating in this survey and having your voice be heard!

What college/institution do you attend?

[list of colleges participating in survey – hidden for confidentiality and brevity]

Other

If Other Is Selected, Then Skip To Please provide the name of the colleg...If Other Is Not Selected, Then Skip To Why did you decide to go to college/g...

Please provide the name of the college/institution that you attend:

Why did you decide to go to college/get more education? (Please check ALL that apply.)

- I need a higher paying job.
- I want more job security.
- I want more opportunities for promotions.
- I want better working hours.
- I want to learn something new.
- I want a second chance because I lacked opportunity when I was younger.
- I am trying college again because I wasn't ready for college the first time.
- Someone told me I should go to college/get more education.
- I want a job that is more interesting to me.
- I am taking classes for prerequisites.
- Other, please specify: _____

What did you consider when deciding to attend this college/institution? (Please check ALL that apply.)

- Price
- Location
- Programs offered (field, credential level such as associate's degree in nursing)
- Program quality
- Reputation of college/institution
- Scheduling of courses
- Length of program
- Job prospects after graduation
- Recommendations from friends/family
- Ease of enrollment
- Hands-on learning opportunities
- School facilities
- Class size
- Financial aid offerings
- Was not able to go to the college/institution I wanted to attend
- Other, please specify: _____

If Was not able to go to the c... Is Selected, Then Skip To You selected that you could not go to...If Was not able to go to the c... Is Not Selected, Then Skip To Where did you find information regard...

You selected that you could not go to the college/institution you wanted to attend. What was your first choice of college/institution and program?

- College/institution:
- Program:

Where did you find information regarding this institution when making your decision? (Please check ALL that apply).

- Print advertisements (like PennySaver, magazine ad, etc.)
- Social media sources (like Facebook, Instagram, etc.)
- Online reviews (like Yelp, Google, etc.)
- TV commercials
- Radio commercials
- Online ads
- College/institution website
- Emails from the college/institution
- Phone calls from the college/institution
- Visit to the college or institution/just walked into the college
- "Student Performance Fact Sheet" or other government-required information
- From someone who attended the college/institution
- From someone who had heard about the college/institution
- Job placement agency
- Other, please specify: _____

How did you know that this information was reliable, trustworthy, legitimate, real?

What factors did you use to determine that this was a good college/institution?

In the next set of questions, we ask about the information that would have been useful to you and other potential students when looking at colleges/institutions.

Would the following information be useful to you as a prospective student?

	Not at all useful	Slightly useful	Somewhat useful	Very useful	Extremely useful
Graduation rate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Job placement rates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Percentage of students who pass licensing and industry certification exams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Graduate salary information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Percentage of students who cannot pay back student loans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Percentage of students who stayed enrolled	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase in salary after graduation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How much money the people in charge of running the college/institution make	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
What the college/institution spends money on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student complaints about the college	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student satisfaction ratings/reviews	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Would it be useful to know how your program compares to similar programs at other private colleges/institutions and public community colleges?

- Yes
- No

When would this information have been the most useful?

- In high school
- Months before I enrolled
- Days before I enrolled
- Hours before I enrolled
- During enrollment
- Other, please specify: _____

Is there any other information you wish you had known before enrolling at this college/institution?

All students should receive a copy of the “Student Performance Fact Sheet” for their program when they enroll. This fact sheet tells students information about their program. The government wants to improve this form, so we want to know what you think of it. Please click on the link below to see a version of the Student Performance Fact Sheet for a random program. THIS IS NOT YOUR PROGRAM, but just a sample for you to review before we ask questions about how to improve this form. After you have reviewed the sheet, please answer the following questions.

Student Performance Fact Sheet

What are three words you would use to describe the Student Performance Fact Sheet?

- Word 1
- Word 2
- Word 3

We would like to improve the Student Performance Fact Sheet based on what you tell us.

What information should be provided on the Student Performance Fact Sheet to help you make decisions about college/higher education?

How could the Student Performance Fact Sheet be improved to make the information clearer (such as formatting, information, display, access, etc.)? Please be as SPECIFIC as possible.

Do you recall seeing the Student Performance Fact Sheet for your program during your enrollment process?

- Yes
- No

If Yes Is Selected, Then Skip To How did you use the information in th...If No Is Selected, Then Skip To Thinking back to when you were decidi...

How did you use the information in the Student Performance Fact Sheet?

If How did you use the informa... Is Empty, Then Skip To End of BlockIf How did you use the informa... Is Not Empty, Then Skip To End of Block

Thinking back to when you were deciding to enroll here, how would the information in the Student Performance Fact Sheet have shaped your decision to attend your college/institution?

Is there anything else that we should understand to help students make good decisions about college/higher education?

You're almost done. Next, we just would like to know more about you, and then we'll need to know how to contact you if you would like to enter the drawing to win a \$20 Target gift card.

What are you studying?

[list of programs drawn from participating institutions' catalogs – hidden for confidentiality and brevity]

Other

If Other Is Selected, Then Skip To Please provide your area of study: If Other Is Not Selected, Then Skip To 17. What degree are you working toward...

What are you studying?

What degree are you working toward? (Please check ONE.)

- High school diploma or equivalent
- Certificate, certification, or other vocational credential
- Associate's degree
- Bachelor's degree
- Master's degree
- Doctorate
- Other, please specify: _____

Are most of your classes online?

- Yes
- No

What is your gender?

- Female
- Male
- Other, please specify: _____

How old are you?

Pick one or more categories with which you identify:

- American Indian or Alaska Native
- Asian
- Black or African American
- Hispanic or Latino
- Native Hawaiian or other Pacific Islander
- White
- Other, please specify: _____

Currently, what is the highest level of education you have completed?

- High school diploma or equivalent
- College-level diploma, certificate, or other vocational credential
- Associate's degree
- Bachelor's degree
- Master's degree
- Doctorate
- Other, please specify: _____

To say thank you, we are giving away twenty \$20 Target gift cards. Do you want to enter the giveaway?

- Yes
- No

If No Is Selected, Then Skip To End of Survey

To enter the giveaway, please provide your name and a valid email address. Your name and contact information will not be connected to your survey responses.

- First name
- Last name
- Email address

Appendix G. Reporting Requirements for All Entities Analyzed

Double click on the table below to expand categories for detailed information on reporting requirements. Dynamic table that allows for filtering by entity, area, metric grouping, and specific metric available from the author upon request.

	ACCET	ACCSC	BPPE	CCC Scorecard	Common Data Set	CSAC	DEAC	Gainful Employment	Title IV	UC	WASC	IPEDS
[-] Institutional characteristics	✓	✓	✓	✓	✓		✓	✓	✓	✓	✓	✓
+ About	✓	✓	✓		✓		✓	✓	✓	✓	✓	✓
+ Financial Aid	✓	✓	✓		✓				✓		✓	✓
+ Institutional revenues and expenses	✓	✓	✓				✓	✓		✓	✓	✓
+ Legal, regulatory, audit, or investigations	✓	✓					✓		✓		✓	
+ Faculty				✓	✓		✓			✓	✓	✓
+ Facilities									✓			
[-] Program characteristics	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
+ Costs to student		✓	✓		✓			✓	✓	✓		✓
+ Program offerings and information				✓	✓		✓	✓	✓	✓	✓	✓
+ Enrollment	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓
[-] Student characteristics				✓	✓					✓	✓	✓
+ Gender and age				✓	✓						✓	✓
+ Race and ethnicity				✓						✓	✓	✓
[-] Student outcomes	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
+ Completion	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
+ Job placement and employment	✓	✓	✓			✓	✓	✓	✓			
+ Licensure exam passage rate		✓	✓									
+ Satisfaction					✓		✓			✓		
+ Transfer	✓			✓			✓		✓			
+ Earnings and wages		✓	✓	✓		✓						
+ Withdrawals	✓	✓					✓				✓	
+ Student debt and loans		✓	✓		✓			✓	✓	✓		
+ Retention and persistence				✓	✓	✓			✓	✓		✓