

EMPLOYMENT OUTCOMES AT CALIFORNIA COLLEGES:

IMPROVING INFORMATION FOR STUDENTS,
SCHOOLS, AND POLICYMAKERS



ACKNOWLEDGEMENTS

The Institute for College Access & Success (TICAS) is an independent, nonprofit, nonpartisan organization working to make higher education more available and affordable for people of all backgrounds. To learn more about TICAS, visit ticas.org and follow us on Twitter at [@TICAS_org](https://twitter.com/TICAS_org).

This report was written by Angela Perry. Debbie Cochrane, Lindsay Alhman, Neha Dalal, Veronica Gonzalez, and Jessica Thompson also made substantial contributions. We would like to thank the many experts who were generous in sharing their time and expertise on California's available employment and wage outcomes data with us. They include Sara Adan, Matthew Case, Chris Furguele, Brianna Moore-Trieu, Michael Boucher, Patricia Felt, Marcus Dawson, Ria Sengupta Bhatt, Rona Sherriff, Brianna Bruns, and Colleen Moore.

This report can be reproduced, with attribution, within the terms of this Creative Commons license: creativecommons.org/licenses/by-nc-nd/3.0/.

TABLE OF CONTENTS

Introduction	4
Availability of Education Employment Outcomes Data in California	5
California Education Employment Outcomes Data are Inconsistent, Incomplete, and Inaccessible	6
Table: California’s Available Data on Employment and Wage Outcomes	7
Available Outcomes Data are Inconsistent: Separate and Unequal Data Reports	8
Images: What Earnings Reports Look Like From Different Public Segment Reports	9
Available Outcomes Data are Incomplete: Siloed Systems and At Risk Student	12
Box: Limitations of California’s Existing Data	13
Available Outcomes Data are Inaccessible: Uncoordinated and Disconnected Systems	14
Examples from Other States	14
Policy Recommendations	16
Create a Centralized Database to House All Postsecondary Employment Outcomes Data	16
Provide Private Postsecondary Students with Reliable Program–Level Wage Data	17
Create a Publicly Accessible, Consumer–Tested Education Outcomes Dashboard	17
Box: More Robust Outcome Data Need Not Come at the Expense of Reduced Privacy and Data Security	18
Conclusion	19

Introduction

California has long been a national and global leader in developing and maintaining quality higher education options, as well as in providing financial aid and consumer protections for Californians who access that education. However, although California's colleges and the state government do collect, receive, and report a great deal of data,¹ these data have not been effectively connected to present accurate, understandable, and comparable employment outcomes information in a transparent way for policymakers, students and families, institutions, researchers, and others.²

While not the only benefit of higher education, the likelihood that a particular program will lead to a successful future career is one of the primary factors students and families consider when deciding whether and where to go to college, and how to pay for it.³ Employment and wage outcomes linked to higher education are also critical for policymakers who allocate resources and hold postsecondary schools accountable. Employment metrics can serve as an early predictor of successful student loan repayment, a topic of paramount concern for policymakers at all levels, as well as for researchers, students, the general public, and other stakeholders.⁴ And these metrics also provide critical information to colleges themselves, enabling them to assess the real world results of their educational efforts, and to work toward continuous improvement of their programs and curriculum.

In the absence of a statewide data system in California, the California Community Colleges (CCC), California State University (CSU), and University of California (UC) have each initiated their own independent efforts to share higher education outcomes data. However, the data each independently share are slightly different, and there is no consistency in format or presentation among any of the segments. Further, students who attend private institutions have no access to state-collected data, and are instead presented with outcomes data collected and reported by the school itself, meaning that the quality and usability of the data is highly dependent on the institution the student attends. Unfortunately, many students who attend accredited nonprofit schools receive no outcomes data at all because of exemptions in state law. The result is that higher education employment outcomes data available in California are not comparable because of inconsistency in data definitions and reporting between the segments and individual schools; incomplete because it does not include vital elements that students and policymakers need to know; and inaccessible because it is not housed centrally for statewide use.

This report provides an overview of higher education employment outcomes data currently available in California, highlights where data are lacking, and makes recommendations for the state to improve the data's availability, comparability, and usability by:

- Creating and developing a secure, private, central statewide database that collects and houses student-level education, employment, and wage data for all higher education institutions in California.
- Even in the absence of a statewide database, making verified employment and wage outcomes data newly available to students at private schools by requiring that the Bureau for Private Postsecondary Education (BPPE) and the Employment Development Department (EDD) share data in the same way that public segments do.

- Creating a publicly accessible dashboard that presents accurate, comparable education employment outcomes data by school and by program.

In addition, this report also highlights qualities of several systems developed in other states, which can serve as examples as California develops a model statewide system.

Availability of Education Employment Outcomes Data in California

CCC, CSU, and UC each maintain at least one online database that contains some information about the median earnings of their students who complete a credential. These data are compiled by collaborating with California's EDD, which manages the state's Unemployment Insurance (UI) program. Each segment's system office collects data from their campuses, and provides EDD with student-level records to match against state UI data. This data match allows EDD to see whether the student is employed and how much the student is making. An additional data match connects student-level data with EDD's Quarterly Census of Employment and Wages, which enables EDD to also determine the industry in which the student is employed. These data are encrypted and returned to the segment system offices where they are used to create wage and employment outcomes reports.

In 2013, CCC released the first of these outcomes data via a tool called Salary Surfer, which allows students and the public to see salaries associated with degrees or certificates in specific disciplines.⁵ CCC later released the Data Mart⁶ and the CTE LaunchBoard,⁷ both of which provide additional outcomes data.⁸ However, these data are designed primarily to be used by researchers and CCC staff. The Data Mart is available to the public, but the relevant LaunchBoard data require a CCC login to access.

In 2014, the Legislature passed a bill (SB 1022, authored by Senator Huff)⁹ requiring that CSU and requesting that UC create tools similar to CCC's Salary Surfer, using EDD data to enable students to analyze employment outcomes. In response to this legislation, CSU created the Labor Market Outcomes Dashboard,¹⁰ and UC created the Undergraduate Employment Outcomes tool¹¹ and the Alumni at Work tool,¹² all of which present aggregated UI data online to inform students about employment and wage outcomes. Having these data available was a huge step forward for students and families trying to make big decisions about their future in an information vacuum. However, although each of the three public segments use the same source data from EDD, each of them approach the data in a different way, and present the data to the public in a totally different format. Additionally, because each of these systems presents their data independently, there is no single place that a user can go to find and compare higher education employment outcomes data across the public higher education segments in California.

Data incomparability and gaps in overall data availability are even more pronounced for students attending any of the over 1,000 private postsecondary schools in California.¹³ These institutions are overseen by BPPE,¹⁴ a state agency within the Department of Consumer Affairs, and are required to collect and report data gathered through alumni surveys to BPPE in an Annual Report, as well as to provide prospective students with the data in what is called a School Performance Fact Sheet (SPFS).¹⁵ Unfortunately, survey data are difficult to collect, difficult to verify, easier to manipulate than independent data, and can produce biased results.¹⁶ Unlike the public systems' data, the SPFS is generally provided to students as a multi-page

hard copy or as an electronic PDF, and there is no central data repository where students and families can go to easily find or compare the information.¹⁷ Additionally, the data reported to students on the SPFS are generally not verified by BPPE. The only opportunity BPPE has to verify the information provided to students on the SPFS is through their school compliance inspections. However, BPPE is only required to perform one announced and one unannounced compliance inspection of each school it oversees every five years, and even at that rate, it has a substantial backlog of inspections that they report will not be resolved in the foreseeable future.¹⁸

Further complicating the availability of employment outcomes data is the fact that some private schools are exempt from BPPE oversight and therefore exempt from the SPFS requirement altogether, including the 171 schools¹⁹ accredited by the Western Association of Schools and Colleges Accrediting Commission for Senior Colleges and Universities (WSCUC) and the Accrediting Commission for Community and Junior Colleges (ACCJC), as of October 2018.²⁰ Additionally eligible to apply for exemption from BPPE oversight are any qualified nonprofit workforce development training programs accredited by an accrediting organization for workforce development, and any rehabilitation services recognized by the Department of Rehabilitation, among others.²¹ These schools are therefore not required to provide any outcomes data to students and families, and are not even required to report student outcomes data to BPPE.

Although most components of California's higher education system report some kind of overall information on education employment outcomes to the public, each does so independently from each other, and some students and institutions are left out entirely. The result is that students, schools, policymakers, and other stakeholders are left with a patchwork of incomplete information about the state of the higher education employment outcomes in the state.

California Education Employment Outcomes Data are Inconsistent, Incomplete, and Inaccessible

As described above, California has made improvements in the availability of education employment outcomes data for students attending public colleges. However, those data are currently presented independently and without any attempt at uniformity, and are therefore largely inconsistent and incomparable across segments. Additionally, requiring users to access multiple databases and become familiar with multiple report formats make the data far less accessible than they should be. Meanwhile, students attending private postsecondary schools in California are covered by entirely different data requirements established by the state, and as a result have access to far less robust and accessible data about the employment and earnings outcomes - if they have access to any data at all - they might expect to face after completing a program or degree.

California's Available Data on Employment and Wage Outcomes

Institution	CCC		CSU	UC		Private Postsecondary	
	Salary Surfer	"Data Mart* (College Wage Tracker)"	Labor Market Outcomes Dashboard	Alumni at Work	Undergraduate Alumni Outcomes	Schools Overseen by BPPE	Exempt Schools
Data Source	Unemployment Insurance fund data from the California Employment Development Department (UI Data)	UI Data	UI Data	UI Data	UI Data	Survey data collected by institutions	No data
Cohort	Groups graduates who received an award within a 5 academic year period	Groups graduates who received an award within an 8 academic year period	Groups graduates who received an award by individual graduation year	Groups graduates who received an award within 3 academic year period	Groups graduates by the number of years passed since graduation	Groups "graduates employed in the field" (minus "graduates unavailable for employment") for the previous 2 calendar years**	No data
How the Data are Presented	Website	Website	Website	Website	Website	Multi-page physical or online PDF	No data
Earnings Time Period	2 years prior to completion, 2 years post completion, and 5 years post completion	3 years post completion	2 years post completion, 5 years post completion, and 10 years post completion	2 years post completion, 5 years post completion, and 10 years post completion	2 - 12 years post completion	2 years post completion	No data
Type of Data	Median annual earnings data	Median annual earnings data	Mean, median, 25th-75th percentile annual earnings data, and industry of employment information	Median annual earnings data, estimated gross monthly pay, and geographic cost-of-living information	Mean, median, 25th percentile, and 75th percentile earnings data, employment rates, and industry of employment information	Job placement and other employment rates, annual salary and wage data	No data
Level of Data	Program-level data, not disaggregated by college	Program-level data, disaggregated by college	Program-level data, not disaggregated by college	Program-level data, disaggregated by college	Program-level data, not disaggregated by college	Program-level data presented independently by campus	No data
Data on Full or Part Time Employment	No data	No data	No data	No data	No data	Distinguishes between "full time" employment (at least 30 hours per week for 5 weeks) and "part time" employment (totaling at least 20 hours per week for 5 weeks)	No data
Professional Licensing	No data	No data	No data	No data	No data	License examination passage rates for programs leading to employment for which passage of state licensing examination is required	No data

* The Data Mart's System Wage Tracker presents the same information as Salary Surfer, and is therefore not included in the chart.

** "Graduates employed in the field" and "graduates unavailable for employment" are defined in CEC Section 94928.

Available Outcomes Data are Inconsistent: Separate and Unequal Data Reports

The CCC, CSU, and UC data on employment and wage outcomes all use the same source data from the state, but each segment forms their own data definitions, assumptions, and reporting formats for those data. The wage and employment data provided by California's private schools are created using a completely different data source, and presented in an even less user-friendly format. The preceding chart assesses each of these systems and the data they provide.²²

Each of the public segments utilize a website to publish their employment outcomes data, and all provide median earnings data, but beyond that no two systems provide the same data in the same way and based on the same definition. Some of the key differences in the data are hard to grasp without a close inspection, which can make it seem to a viewer that the data points are comparable when they are not. To add further confusion, CCC and UC provide information via several different public databases – Salary Surfer, the Data Mart's System Wage Tracker,²³ and the Data Mart's College Wage Tracker²⁴ from the CCC; and the Undergraduate Outcomes Data tool²⁵ and the Alumni at Work tool²⁶ from the UC – and each database presents the same source data in a different way and in different formats. Additionally, each segment has created independent and differently formatted websites to house this information, and there is no consistency in design among them. If a user desired to compare outcomes from different systems, they must not only find each of the segments' data reports and identify and understand the differences in the data they are being presented, but they must also become familiar with a new format for each system, and even within the same system in the case of CCC and UC.

Unlike the public segments, there is no segment-wide tool for students to assess the outcomes of different private school programs. Instead, as discussed above, students at schools overseen by BPPE are presented by their college with program-specific documents, provided as a PDF or in hard copy.²⁷ Heavily proscribed by statute, the SPFS provides students and families with data on wage outcomes presented in \$5,000 increments, full-time and part-time employment, and the number of graduates that are employed in the field.²⁸

Overall, the SPFS is populated with extremely different data than that provided by the public segments. For example, the SPFS is the only public outcomes report in California that includes information on the number of students that pass required licensing examinations in order to work in the field, however, none of its data match the employment outcomes data provided by any of the public segments – the metrics used do not align, nor do the source data. Further, the SPFS data are presented in a much less user-friendly format than the public segments' data,²⁹ and the data presented are also much less reliable,³⁰ meaning that some of California's most vulnerable students currently do not have access to verified information needed to make informed decisions. Worse still, students at BPPE-exempt schools may have no access to any outcomes data whatsoever.

IMAGES: What Earnings Reports Look Like From Different Public Segment Reports

CCC Salary Surfer (Health)

Curriculum	Award Type	Median Annual Salary		
		2 Years Before	2 Years After	5 Years After
Administrative Medical Assisting	Degree	N/A	\$20,522	\$26,502
Administrative Medical Assisting	Certificate	\$14,894	\$25,606	\$31,170
Cardiovascular Technician	Degree	\$25,518	\$50,684	\$55,529
Cardiovascular Technician	Certificate	\$24,918	\$55,533	\$57,576
Clinical Medical Assisting	Degree	\$17,989	N/A	\$19,488
Clinical Medical Assisting	Certificate	\$11,186	\$23,583	\$24,967
Dental Assistant	Degree	\$13,565	\$28,995	\$33,143
Dental Assistant	Certificate	\$14,263	\$26,009	\$31,191
Dental Hygienist	Degree	\$18,210	\$57,171	\$65,452
Dental Laboratory Technician	Certificate	\$23,508	\$20,035	\$36,980
Diagnostic Medical Sonography	Degree	\$28,528	\$76,671	\$87,597
Diagnostic Medical Sonography	Certificate	\$25,256	\$80,610	\$88,007
Electro-Neurodiagnostic Technology	Degree	\$14,647	\$65,447	\$78,416
Health Information Coding	Certificate	\$44,220	\$63,073	\$65,384
Health Information Technology	Degree	\$45,469	\$58,964	\$65,014
Health Information Technology	Certificate	\$39,835	\$56,601	\$60,593
Health Occupations, General	Degree	\$22,748	\$23,078	\$35,724
Health Professions, Transfer Core Curriculum	Degree	\$20,273	\$30,340	\$52,978
Licensed Vocational Nursing	Degree	\$18,346	\$39,695	\$52,521
Licensed Vocational Nursing	Certificate	\$19,128	\$38,941	\$45,169
Massage Therapy	Certificate	\$21,210	\$20,964	\$25,747
Medical Assisting	Degree	\$13,913	\$21,205	\$28,706
Medical Assisting	Certificate	\$12,888	\$26,457	\$33,799

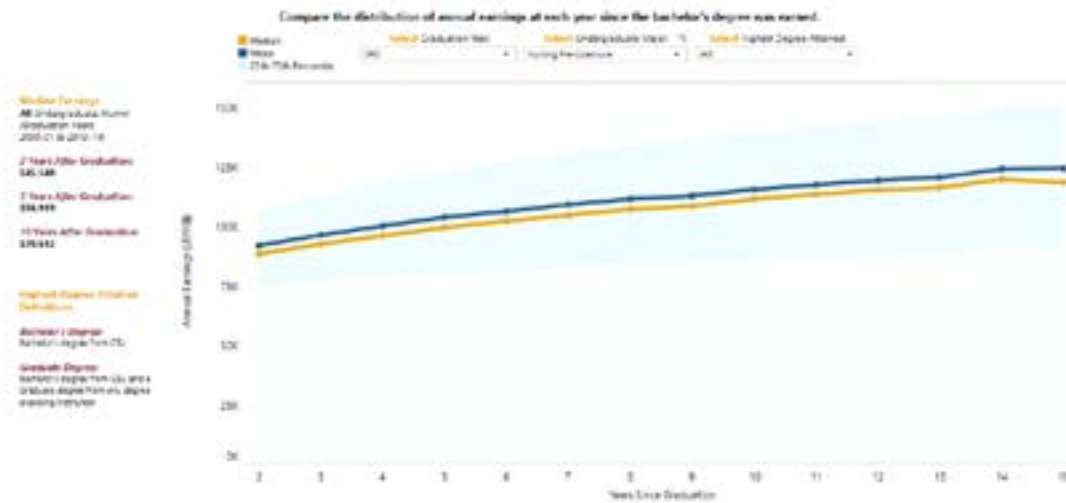
CCC College Wage Tracker (Medical Assisting)

Award Recipient Wages - Report Data & Format Area			
Report Area			
Award Recipient Wages			
Page 1 of 6 (59 items)			
Award Year 2004-2005 - 2011-2012			
	Median Wage 3 Years After Award	Total Awards	Award to Wage Match Rate
Cabrillo			
Medical Assisting-120800			
Chancellor's Office Approved Certificates Recipient	\$31,528	14	79 %
Canada			
Medical Assisting-120800			
Chancellor's Office Approved Certificates Recipient	\$27,574	35	74 %
Locally Approved Certificates Recipient	\$36,405	18	94 %
Cerritos			
Medical Assisting-120800			
Chancellor's Office Approved Certificates Recipient	\$24,843	23	61 %
Page 1 of 6 (59 items)			

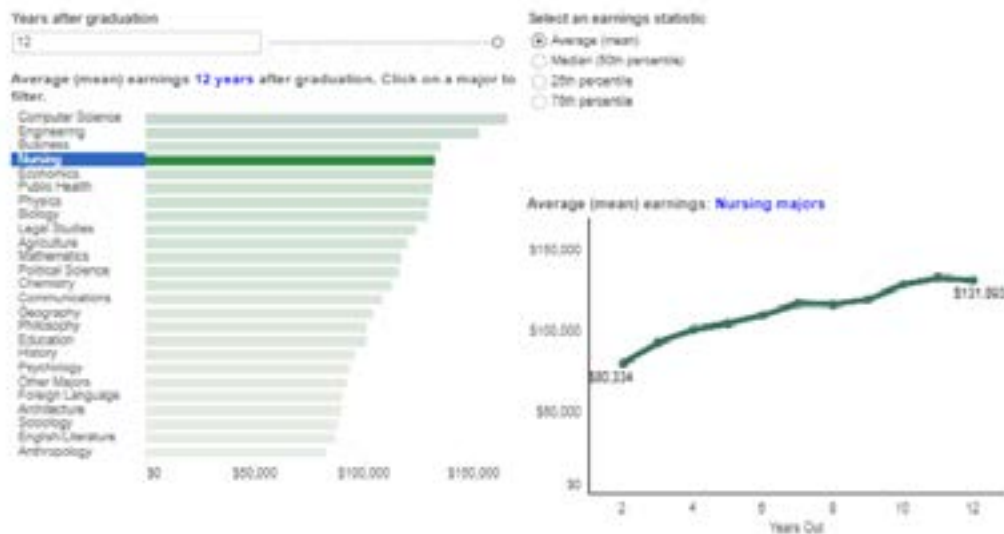
CCC System Wage Tracker (Medical Assisting)

Award Recipient Wages - Report Data & Format Area			
Report Area	Award Recipient Wages		
	Award Years 2007-2008 to 2011-2012		
	Median Wage 2 Years Before Award	Median Wage 2 Years After Award	Median Wage 5 Years After Award
Medical Assisting-170800			
AA/AS Degree Recipient	\$13,513	\$21,260	\$28,706
Chancellor's Office Approved Certificate Recipient	\$12,888	\$18,451	\$33,799
Locally Approved Certificate Recipient	\$15,867	\$24,634	\$30,729

CSU Labor Market Outcomes Dashboard (Nursing)



UC Undergraduate Alumni Outcomes (Nursing)

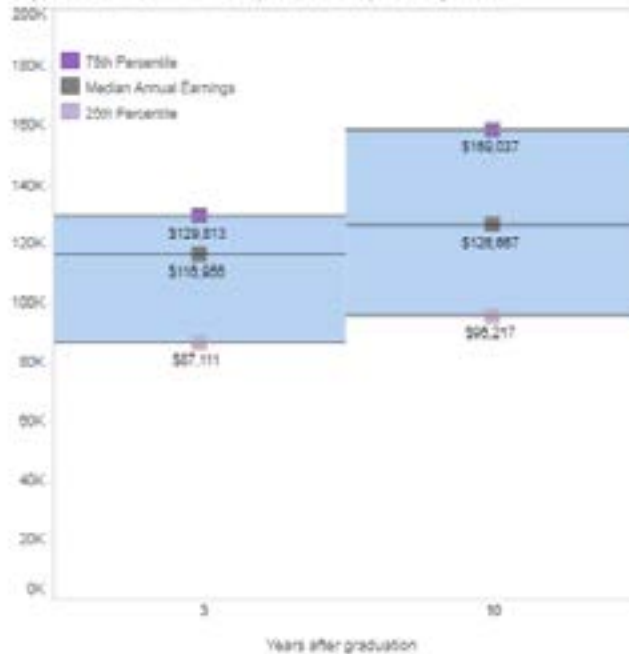


UC Alumni at Work (Nursing)

Undergraduate UC Car: Los Angeles | Graduation Year: (All) | Discipline: (All) | Major: NURSING | Completed Graduate Degree: (All)

Typical Annual Earnings All Campus: All Discipline: All Major: NURSING

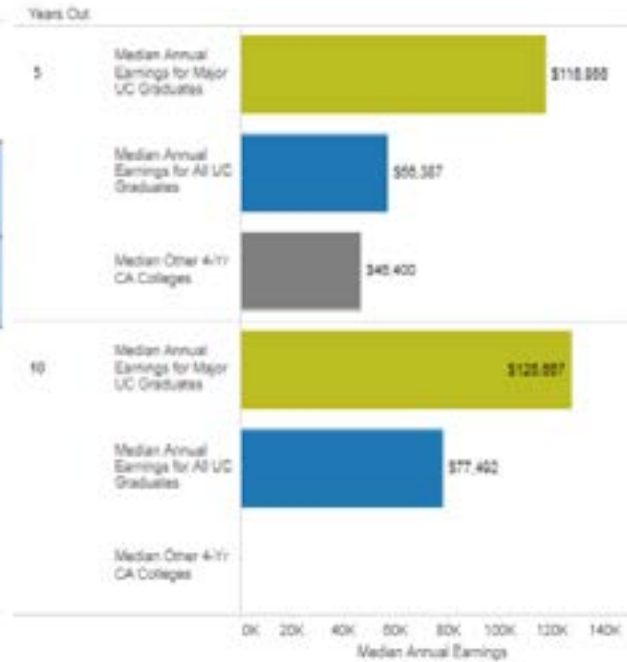
The chart below shows the middle range of UC alumni earnings salaries for the selected major or discipline using the 25th percentile, median and 75th percentile. The range in salary shows a likely range of salaries for alumni with this major at 2, 5 and 10 years after graduation.



Note: 25% of graduates earn salaries greater than the top of the blue range and 25% earn salaries below the bottom of the blue range. Information is suppressed for data points with less than 30 alumni.

UC Comparisons of Annual Earnings

The chart below shows the typical annual earnings for the major selected compared to all UC graduates and compared to students who attended other four year colleges in California. Note: The Graduation Year filter does not apply to this chart.



Note: Data from "Other four year colleges" is from the USDOE College Scorecard, which includes students enrolled 5-year and 10 years ago. Includes students who may or may not have graduated. This data is for recipients of Title IV financial aid only and is not differentiated by major.

MTI Business College SPFS (Medical Assisting)

Salary and Wage Information

Annual Salary and Wages reported for graduates employed in the field

Calendar Year	Graduates Available for Employment	Graduates Employed in Field	\$20,000 to \$25,000	\$25,001 to \$30,000	\$30,001 to \$35,000	\$40,001 to \$45,000	No Salary Information Reported
2015	29	24	0	24	0	0	0
2016	25	20	0	18	2	0	0

Students are entitled to a list of the objective source of information used to substantiate the salary disclosure. To obtain this list you may go to www.mfistockton.com and go to additional information and click the CIP code for the Medical Assistant program.

Available Outcomes Data are Incomplete: Siloed Systems and At Risk Students

Roughly 15 percent of undergraduate students in California are enrolled at a private college or workforce program, rather than a public college in one of the three segments.³¹ These students share the same desire for a successful future as their counterparts enrolled in public colleges. However, because BPPE does not partner with EDD to generate and publish employment outcomes data like the public segments do, students and families are not able to easily compare and evaluate private school programs across schools, and policymakers are not able to use those data to make accurate, informed decisions about how to best leverage and invest state resources. Further, because of exceptions in state law, students and families considering programs at nonprofit schools or programs accredited by certain agencies may have access to no outcomes data whatsoever.

The lack of reliable outcomes data has resulted in many of California's students being harmed by false promises made by bad actors at for-profit, private schools within the state, based on oftentimes falsified or misleading employment outcomes data. For example, in 2015 both the U.S. Department of Education and California's attorney general found that schools operated by Corinthian Colleges consistently misled enrolled and prospective students about their chances of getting a job.³² In one instance, students at a medical assistant program in Los Angeles were advertised a job placement rate of 85 percent, when the rate was actually zero.³³ This history underscores how critical it is that the state establish verifiable, non-proprietary employment outcomes data by college and program for students attending private institutions, as well as those attending public institutions. Even if the data provided for the public segments improve, until California collects verified data on outcomes at private schools the state's data collection efforts will remain incomplete.

Limitations of California's Existing Data

While UI data are currently the best source of employment and wage outcomes data available within California, there are substantial gaps in those data that are important to understand when using and interpreting student outcomes data.

First, UI data exclude unemployed individuals, self-employed individuals, members of the military, federal employees, incarcerated individuals, the deceased, or individuals that move out of state. These omissions make the data less helpful to students who seek to be self-employed – as more and more of graduates are, by desire or necessity – and it also skews the data in multiple ways, including by excluding potentially higher earners who moved out of state to take nationally competitive jobs, as well as excluding all of the \$0 incomes of unemployed students.³⁴ Further, because Social Security numbers are used to perform the UI data match, the data reported do not include undocumented students, further skewing the results.

California's UI data also do not distinguish whether a student is working full-time or part-time, although other states do collect that information, which makes it difficult to assess from the data whether a student is working a reasonable amount of time in a well-paying job or struggling to work enough hours to cover their living expenses. And while EDD is able to determine the industry in which an individual is employed, California's UI data does not utilize occupation data (e.g., Standard Occupational Classification or SOC codes), meaning that the data cannot be used to determine what kind of job the student has, or if it is related to the field the student was trained or educated for.³⁵ This is a particular problem for students enrolling in career training programs, rather than degree granting programs. Two states - Alaska and Louisiana - already collect occupation codes as part of their UI wage records, and California could follow suit.³⁶

Lastly, none of the segments currently provide any public information³⁷ about students who do not complete their programs, meaning that there is currently no way to assess whether there is any value conferred to a student who invests in an education but is unable to complete the program for whatever reason. The available data also cannot determine if a student has chosen not to work, and do not provide public information about students who transfer or continue their education in another system.

Improvements can be made to this data, including integrating hourly wage data from employers into EDD data, utilizing SOC codes, and exploring other avenues for collecting employment data at the state level like partnering with the Franchise Tax Board. Partnerships can also potentially be established with other state agencies within California, or even with other states, to collect more data that would be valuable to students and families.

Available Outcomes Data are Inaccessible: Uncoordinated and Disconnected Systems

As other analyses have pointed out,³⁸ there is currently no central agency to oversee higher education in California. Instead, each of the public segments is governed independently. The private institutions are governed by BPPE, yet another separate agency. This is one main reason why each public segment is compiling data independently, analyzing the data in their own unique way, and presenting it with their own unique tools.

The California Postsecondary Education Commission (CPEC) was the agency previously tasked with planning and coordinating the state's three public higher education systems and independent universities.³⁹ However, CPEC was defunded in 2011,⁴⁰ and the data it once collected are no longer updated. The prospects for re-establishing a higher education coordinating agency in CA are largely unclear, in part because of reluctance from the public and private colleges themselves. There are legitimate concerns that some colleges have about being compared unfavorably or in a way that does not accurately represent the experience of their students or differences in mission. It is imperative that the state bring each of the segments to the table to work on crafting an agreement that they can all agree to.

The U.S. Department of Education's Privacy and Technical Assistance Center (PTAC) has prepared best practices specifically designed to facilitate drafting agreements of this nature.⁴¹ Beyond getting to an agreement for coordination, among the most complicated details to work out will be about how to define and analyze the employment and wage data in question, including how to define a cohort, what earnings time period to measure, what type of earnings data (median, mean, etc.) to use, which students to include, how to account for students who aren't included in UI data, how and whether to include non-completing students, and how to track students that transfer between schools. These are only some of the questions that would need to be decided, and there are often specific reasons why each of the public segments has answered these questions in different ways that will need to be worked through carefully and thoughtfully.

Despite these gaps in consistency, completeness, comparability and coordination, the need for more and better education outcomes data at the state level is clear. States are uniquely positioned to corral the data in a way that is accessible to their residents as well as to use the information to best leverage the considerable investments they are making in both schools and the students who enroll in them.

Examples from Other States

Thirty five states have linked postsecondary data with workforce data, and seven others are currently working on linking the two as of 2018.⁴² In fact, as of 2016, 28 states matched UI data with postsecondary data in order to create workforce metrics at the state level, and 12 of those states have created state longitudinal data systems which include private and for-profit school data as of 2018. California has the opportunity to learn from the strengths of the public outcomes reports developed in other states in order to develop a model system to serve students and families, policymakers, and institutions.

Minnesota has several online reports that allow the public to view workforce outcomes data. The Minnesota Statewide Longitudinal Education Data System matches student data from pre-kindergarten through postsecondary education and into the state workforce using UI data, and enables researchers and

policymakers to gauge the effectiveness of current programs and design targeted improvement strategies to help students.⁴³ The Graduate Employment Outcomes (GEO) report allows the public to search by program, institution, degree attained, and cohort.⁴⁴ The associated GEO data tool shows how many Minnesota graduates are finding jobs in the state and the wages they are earning.⁴⁵ The tool also allows students to compare different programs on the same page, and to directly compare the outcomes of different career paths. The data also include private postsecondary schools.

Missouri also utilizes UI data to provide a public website called MoSCORES designed to provide job seekers, students, policymakers, and institutions with a better understanding of education and training options and typical work outcomes of program graduates.⁴⁶ The website provides information on program details along with demographic and performance measures. The tool allows data to be searched by program, credential type, school, and location. The data include some private postsecondary institutions, as well as institutions registered with the Missouri Eligible Training Provider System, and the tool allows users to compare similar programs across institutions.⁴⁷ Missouri is also one of very few states with robust non-credit program outcomes, and the project is notable for integrating both credit and non-credit program data, which were previously siloed in two different administrative sources. The MoSCORES website currently includes the program inventory information for some private institutions, with plans to integrate performance and employment outcomes for these schools in the future.

Texas operates a public database called the Consumer Resource for Education and Workforce Statistics (CREWS), which enables students to compare post-graduate wages across various degree programs and training and career choices.⁴⁸ Students are able to search the available data based on the area of study, occupation, institution, or major that they are interested in. Texas also provides public data on state-level gainful employment rates for students graduating from all programs,⁴⁹ and additionally makes exit cohort reports available which include data on all students, including non-completers.⁵⁰ Texas also participates in the College Measures program, and operates LaunchMyCareerTX.org, which allows students to view employment and wage data based on geographic location and is searchable by jobs, majors, schools, and industries.⁵¹

These states and many others have developed data systems that link postsecondary data and employment outcomes data together, and each has strengths and best practices for California to learn from. That so many states have worked to create these systems underscores the value of centralized state-level education employment outcomes data to inform unique statewide policy needs for improving student education and workforce outcomes.⁵² States are uniquely positioned to collect education data elements not available in federal datasets, and possess a greater ability to link that information at the student level to data from other sectors, including K-12, social services, rehabilitation, and others.

Policy Recommendations

Education outcomes metrics, especially employment and wage data, must be clear, accurate, and trustworthy. Further, they must be consistently defined, collected, and verified by an independent party, and be easily accessible by students, institutions, policymakers, and the public. Most importantly, the data must be available to all students, including students at private postsecondary institutions. To bring Californians closer to that reality we recommend the following policy changes.

Recommendation: Create a Centralized Database to House All Postsecondary Employment Outcomes Data

The best way to provide consistently defined, verified, and comprehensive postsecondary education and training employment outcomes data for all students within the state is to collect and house it in a centralized state database, as many other states have already done. While a major effort, it will be facilitated by the fact that all three of the public segments are already using the same source and type of data to produce their current metrics. Rather than building a system from scratch, California's centralized database can use existing CCC, CSU, and UC system data matched with UI data from EDD to compile aggregated cohort employment outcomes. It is also essential that the legislature enable an equivalent data match and collection between private postsecondary institutions, BPPE, and EDD, and incorporate that into the centralized database to create comprehensive statewide coverage of the employment outcomes for all students attending both public and private postsecondary institutions in California.

A centralized state database is the most powerful, efficient way to convey California's postsecondary education and training employment outcomes data to students, policymakers, and the public, all in one place.⁵³ It would also allow systems and institutions to collaborate and learn from one another, would reduce the burden on the individual systems to collect and analyze proprietary data, and would make it possible to track students as they transfer - or "swirl"⁵⁴ - through different education segments. Governor Newsom allocated \$10 million to create a longitudinal data system in his 2019-20 budget proposal,⁵⁵ and there is currently pending legislation which seeks to establish a longitudinal data system, which would include employment and wage outcomes data.⁵⁶ However, the current legislative proposals are not yet clear about the intended audience for the data, nor how private postsecondary institutions will be included in the new system. Further, the proposals do not currently propose improvements to the gaps in UI data or the collection of SOC codes, which would make the system an improvement over the status quo, but incomplete. Legislative proposals should continue to be strengthened to ensure students attending private postsecondary institutions are included, that program-level data are available from all colleges complete with SOC codes, and to make feasible improvements to state UI data, including collecting hourly wage information from employers.

The creation of a centralized statewide education database, regardless of how many data elements, agencies, or functions it ultimately includes, is a process that will require thoughtful and extensive collaboration with a variety of stakeholders, especially with the colleges and systems. Ultimately, however, creating such a system will increase the transparency of the education pathways available to students in California, and create a more student-focused approach to the data.

Recommendation: Provide Private Postsecondary Students with Reliable Program-Level Wage Data

It is essential that California increase the availability and quality of program-level wage outcomes data for students attending private schools. Although a statewide data system would be the most efficient solution to California's higher education data problem, even in the absence of such a database, California must take steps to improve the data available to students at private postsecondary institutions. Even in the best case scenario, students attending private schools are currently provided with unreliable data that are difficult to understand and use, while some receive no data at all.

Section 1095 of California's Unemployment Insurance Code empowers CCC, CSU, and UC systems to exchange information with EDD.⁵⁷ BPPE is also specifically mentioned in Section 1095,⁵⁸ and multiple reports have called for BPPE to begin utilizing the UI data from EDD in this way.⁵⁹ California should affirmatively expand this authority to include BPPE as a first and necessary step towards calculating verified wage outcomes for students attending private colleges. Legislation may be necessary to facilitate the data collection and exchange between BPPE and EDD, and to clarify the authority under which the data are exchanged,⁶⁰ but once established the data collected and reported could mirror the public systems' data.

The legislature will also need to require private colleges to report student-level information to BPPE, or an alternative coordinating state entity, so that they can match it with EDD data to calculate employment outcomes for students as the public segments already do. To ensure the inclusion of students at all private colleges, the reporting requirement must also apply to schools currently exempt from BPPE oversight and current SPFS requirements.

Finally, if BPPE is tasked with collecting and reporting education outcomes data, BPPE's technology systems will require additional investments to ensure capability, as well as proper levels of data security and privacy. BPPE is currently waiting for upgrades to its technology systems which are not expected to be fully updated and operationalized until 2021,⁶¹ even without the expansion in scale and scope that we are recommending here.

Recommendation: Create a Publicly Accessible, Consumer-Tested Education Outcomes Dashboard

A key step to make the most use out of statewide education outcomes data is designing an accessible, easy to understand public-facing tool that highlights key data. An example of this type of dashboard is the federal College Scorecard, which includes information from all Title IV schools, and compiles multiple sources of data in a single publicly available location.⁶² Current Scorecard data are available at the institution-level due to data availability at the time it was created; however, both the previous and current Administration stated intentions to disaggregate data by program.⁶³ Program-level data are critical to decision-making, as there is substantial program-level variation in employment outcomes.⁶⁴ Unfortunately, certain features of the Scorecard have recently been removed, eliminating contextual information critical for students and families.⁶⁵ Gainful Employment regulations also require that all covered programs provide the U.S. Department of Education with a list of "occupations that the program prepares students to enter if the student completes this program of study," as well as the SOC codes associated with each of these occupations.⁶⁶

While policymakers, institutions, and researchers may benefit from full access to all of the complex and comprehensive data available, students and families need to be able to focus quickly on the most salient

data points and how to compare them across colleges and across programs. Whether the state creates a centralized database, or institutions maintain independent reports, the data are most valuable if they are made publicly available and presented in a way that is useful to students and families. Consumer testing and careful development will be necessary to create such a tool, and time and funds should be made to do so.

If a statewide database is not created, the legislature should specifically require⁶⁷ all three public college segments and BPPE to coordinate with each other to come up with an agreed upon way to calculate wage and employment data that are comparable across segments, institutions, and programs, and to ensure that program-level data are presented in a uniform and accessible format. To accommodate differences in missions, student populations, and college characteristics,⁶⁸ it may be necessary to allow the systems to create supplemental reports with different assumptions, definitions, and cohorts, but it is imperative that there be at least one set of publicly available education employment outcomes metrics calculated across the segments in the same way and based on the same cohorts, to enable true comparison shopping for prospective students and true statewide assessment of outcomes for policymakers and researchers.

More Robust Outcome Data Need Not Come at the Expense of Reduced Privacy and Data Security

Strong privacy and data security protections are integral to the creation, maintenance, and use of any centralized data system using student-level data, and such a system can be both secure and comprehensive.⁶⁹ Risks to student privacy and data misuse can and must be mitigated, including by adhering to relevant privacy and security laws and principles. The Family Educational Rights and Privacy Act of 1974,⁷⁰ the Fair Information Practice Principles,⁷¹ and Department of Labor regulations⁷² govern privacy issues relating to student and employment data. PTAC provides resources to support states in creating reporting systems that address privacy and assist in determinations about when and how data may be shared.⁷³ State-level data systems should also conform to relevant data security laws and established best practices and standards, and require use of the most modern and appropriate technology without being so proscriptive as to create statutory requirements that become outdated as technology improves. The College Scorecard provides a successful use case demonstrating that it is possible to create such a secure database that complies with all applicable privacy and security laws.⁷⁴

The collection of student-level data elements which fall outside the scope of a centralized data system's goals should be prohibited to ensure that only necessary data elements are included. Beyond articulating what data elements are stored in the system, clearly specified allowable uses for data collected and maintained are necessary for ensuring that a centralized system is never used to take action against students, specifically by law enforcement or other state or federal agencies. Strict policies outlining allowable uses for the data should be established at the outset, with enforceable consequences for any misuse or attempted misuse. Policies should also explicitly prohibit the sale of any data collected, and include a process for notifying students of the data system and specific ways in which their data will and will not be used.

Conclusion

Clear, accurate, and comprehensive education employment outcomes data can help students and policymakers make more informed decisions about – and investments in – postsecondary education and training. Institutions and agencies within California already collect substantial amounts of data, but it is extremely diffuse and siloed, providing nowhere for an interested party to find comprehensive statewide information. Additionally, the data that are available are inconsistently analyzed and presented, and students who attend private postsecondary institutions receive only unverified survey data, if they have access to any data at all. California can and should do better.

We have recommended immediate steps that would improve the comparability and utility of existing data provided by the state’s public college segments, and also expand access to such data to include those attending private colleges. Further, we have recommended that the state ultimately move to create a central statewide database that includes linked education and employment data for all students attending college in California, and to create an online comparison tool that prospective students and families can easily access and navigate as they consider whether and where to go to college, what to study, and how much to pay for it. California is a pioneer in providing affordable, quality public higher education, but lags behind in providing quality higher education data to all students. The time is ripe to change that.

Endnotes

- ¹ Including extensive reporting requirements mandated by the federal government.
- ² California Competes. (May 2018). *Out of the Dark: Bringing California's Education Data into the 21st Century*. Available at: <http://californiacompetes.org/publications/out-of-the-dark>.
- ³ The Institute for College Access & Success. (December 2018). *Of Metrics and Markets: Measuring Post-College Employment Success*, Page 4. Available at: https://ticas.org/sites/default/files/pub_files/of_metrics_markets.pdf. [Hereafter cited as *Of Metrics and Markets*.]
- ⁴ Adam Looney and Constantine Yannelis. (2015). Brookings Institution. *A Crisis in Student Loans: How Changes in the Characteristics of Borrowers and in the Institutions They Attended Contributed to Rising Loan Defaults*. Available at <https://www.brookings.edu/wp-content/uploads/2015/09/LooneyTextFall15BPEA.pdf>.
- ⁵ California Community Colleges Chancellor's Office. (June 19, 2013). New Salary Surfer Website Shows Median Earnings for Those Who Earn Certificates and Associate Degrees at California Community Colleges. Available at: https://californiacommunitycolleges.cccco.edu/Portals/0/DocDownloads/PressReleases/JUN2013/PRESS_RELEASE_SalarySurferWebsiteLaunch_FINAL_061913.pdf.
- ⁶ California Community Colleges Chancellor's Office. Data Mart. Available at: <https://datamart.cccco.edu/DataMart.aspx>.
- ⁷ California Community Colleges Chancellor's Office. LaunchBoard. Available at: <http://doingwhatmatters.cccco.edu/launchboard.aspx>.
- ⁸ Including on progress of basic skills, retention and success rates, transfer velocities, program award counts, grade distributions, completion of credits and remedial subjects, career technical information, and more.
- ⁹ Senate Bill 1022. (2014). Public Postsecondary Education: Labor Market Outcome Information. Available at: https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201320140SB1022.
- ¹⁰ California State University. Labor Market Outcomes. Available at: <http://asd.calstate.edu/dashboard/labor-market-outcomes.html>.
- ¹¹ University of California. Undergraduate Alumni Outcomes. Available at: <https://www.universityofcalifornia.edu/infocenter/uc-undergraduate-alumni-outcomes>. (This tool provides wage outcomes by year after graduation showing mean, median, and 25/75 percentiles, as well as data on in-state employment earners, and industry employment information).
- ¹² University of California. UC Alumni at Work. Available at: <https://www.universityofcalifornia.edu/infocenter/uc-alumni-work>. (This tool also contains other outcome data, including student loans, completion rates, earnings, and the relationship between income and a living wage).
- ¹³ Bureau for Private Postsecondary Education. (Feb. 13, 2019). Advisory Committee Meeting Materials. Available at: https://www.bppe.ca.gov/about_us/meetings/materials/20190213_materials.pdf.
- ¹⁴ Bureau for Private Postsecondary Education. Available at: <http://bppe.ca.gov>.
- ¹⁵ Bureau for Private Postsecondary Education. *Annual Report And School Performance Fact Sheet Minimum Requirements*. Available at: https://www.bppe.ca.gov/enforcement/annreport_minreq_attach.pdf. See also Bureau for Private Postsecondary Education. School Performance Fact Sheet Template. Available at: <https://www.bppe.ca.gov/schools/pfs.pdf>.
- ¹⁶ *Of Metrics and Markets*. See also Jon Marcus. (March 2017). *The Hechinger Report*. "Placement Rates, Other Data Colleges Provide Consumers are Often Alternative Facts." Available at: <http://hechingerreport.org/placement-rates-data-colleges-provide-consumers-often-alternative-facts>.
- ¹⁷ Institutions are required to provide a hard copy of the SPFS to prospective students with their enrollment materials, and to post a digital copy on their institutional websites. BPPE posts links to the SPFSs online, available at: https://www.bppe.ca.gov/annual_report/2015_summary.shtml.
- ¹⁸ Felicia Mello. (Oct. 24, 2018). *CalMatters*. "An 'F' In Oversight: California Fails To Police For-profit Colleges As Feds Back Down On Regulations." Available at: <https://www.sacbee.com/news/local/education/article219960675.html>.
- ¹⁹ Calculations by TICAS using College Scorecard.
- ²⁰ Cal. Ed. Code § 94874(i).
- ²¹ Bureau for Private Postsecondary Education. Application for Verification of Exempt Status. Available at: https://www.bppe.ca.gov/forms_pubs/verification_exempt.pdf.
- ²² The Data Mart's System Wage Tracker presents the same information as Salary Surfer, and is therefore not included in the chart.
- ²³ California Community Colleges Chancellor's Office. Data Mart: System Wage Tracker. Available at: https://datamart.cccco.edu/Outcomes/System_Wage_Tracker.aspx.
- ²⁴ California Community Colleges Chancellor's Office. Data Mart: College Wage Tracker. Available at: https://datamart.cccco.edu/Outcomes/College_Wage_Tracker.aspx.
- ²⁵ University of California. Undergraduate Alumni Outcomes. Available at: <https://www.universityofcalifornia.edu/infocenter/uc-undergraduate-alumni-outcomes>.
- ²⁶ University of California. UC Alumni at Work. Available at: <https://www.universityofcalifornia.edu/infocenter/uc-alumni-work>.
- ²⁷ Institutions are required to provide a hard copy of the SPFS to prospective students with their enrollment materials, and to post a digital

copy on their institutional websites. BPPE posts links to the SPFSs on their website, available at: https://www.bppe.ca.gov/annual_report/2015_summary.shtml.

²⁸ Bureau for Private Postsecondary Education. *Annual Report And School Performance Fact Sheet Minimum Requirements*. Available at: https://www.bppe.ca.gov/enforcement/annreport_minreq_attach.pdf.

²⁹ Su Jin Jez. (Nov. 2016). *Increasing the Effectiveness of State Reporting Requirements and Student Disclosures for Private Postsecondary Institutions*. Available at: https://www.bppe.ca.gov/forms_pubs/reporting_requirements.pdf.

³⁰ Marcus, Jon. "Placement rates, other data colleges provide consumers are often alternative facts." *The Hechinger Report*, 22 March, 2017, <http://hechingerreport.org/placement-rates-data-colleges-provide-consumers-often-alternative-facts>.

³¹ The Institute for College Access & Success. College InSight: Data Results. Available at: <http://college-insight.org/#explore/go&h=d2ba845e01a133dda8fbec57ef51e8b5>.

³² Office of the California Attorney General. (Nov. 17, 2015). Attorney General Kamala D. Harris, Incoming U.S. Education Secretary John King Announce Expanded Debt Relief Options for Corinthian College Students. Available at: <https://oag.ca.gov/news/press-releases/attorney-general-kamala-d-harris-incoming-us-education-secretary-john-king>.

³³ Anya Kamenetz. (Nov. 17, 2015). *National Public Radio*. "Corinthian Colleges Misled Students On Job Placement, Investigation Finds." Available at: <https://www.npr.org/sections/ed/2015/11/17/456367152/corinthian-misled-students-on-job-placement-investigation-finds>

³⁴ *Of Metrics and Markets*, at p. 20.

³⁵ *Of Metrics and Markets*, at p. 21.

³⁶ *Ibid*.

³⁷ CCC's LaunchBoard does have some metrics related to non-completers, but the data is not publicly available.

³⁸ California Competes. (May 2018). *Out of the Dark: Bringing California's Education Data into the 21st Century*. Available at: <http://californiacompetes.org/publications/out-of-the-dark>.

³⁹ California Postsecondary Education Commission. Commission History. Available at: <http://www.cpec.ca.gov/SecondPages/CommissionHistory.asp>.

⁴⁰ Governor Edmund G. Brown. (June 30, 2011). SB 87: Line Item Veto. Available at: https://www.gov.ca.gov/wp-content/uploads/2017/09/SB_0087_Line_Item_Veto.pdf.

⁴¹ Jennifer Engle. (2016). *Answering the Call: Institutions and States Lead the Way Toward Better Measures of Postsecondary Performance*.

Available at: <https://postsecondary.gatesfoundation.org/wp-content/uploads/2016/02/AnsweringtheCall.pdf>.

⁴² *Of Metrics and Markets*.

⁴³ Minnesota Statewide Longitudinal Education Data System. Available at: <http://sleds.mn.gov/>.

⁴⁴ Minnesota Employment and Economic Development. *Graduate Employment Outcomes*. Available at: <https://mn.gov/deed/data/data-tools/graduate-employment-outcomes/>.

⁴⁵ Minnesota Employment and Economic Development. *Graduate Employment Outcomes in Minnesota*. Available at: <https://apps.deed.state.mn.us/lmi/etd/Results.aspx>.

⁴⁶ MoSCORES. Education and Training Program Search. Available at: <https://scorecard.mo.gov/scorecard/Search>.

⁴⁷ MoSCORES. Methodology and Notes. Available at: <https://scorecard.mo.gov/scorecard/Docs/Scorecard%20Methodology%20Page%20-%20Dec2018.pdf>.

⁴⁸ Texas Higher Education Coordinating Board. *Texas Consumer Resource for Education and Workforce Statistics*. Available at: <http://www.thecb.state.tx.us/apps/txcrews/>.

⁴⁹ Texas Higher Education Coordinating Board. *Gainful Employment - Placement Rate*. Available at <http://www.txhighereddata.org/reports/performance/ctcasalf/gainful.cfm>.

⁵⁰ Texas Higher Education Coordinating Board. *Exit Cohort Reports*. Available at: <http://www.txhighereddata.org/index.cfm?objectid=7F22CE00-E218-11E8-BB650050560100A9>.

⁵¹ Launch My Career Texas. Available at: <http://launchmycareertx.org/>.

⁵² John Armstrong and Katie Zaback. (May 2016). Institute for Higher Education Policy. *Assessing and Improving State Postsecondary Data Systems*. Available at: http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/state_postsecondary_data_systems.pdf.

⁵³ Colleen Moore and Kathy Reeves Bracco. (June 2018). Education Insights Center. *A Hunger for Information: California's Options to Meet its Statewide Education Data Needs*. Available at: <http://edinsightscenter.org/Publications/Research-Reports-and-Briefs/ctl/ArticleView/mid/421/articleId/2199/A-Hunger-for-Information-Californias-Options-to-Meet-its-Statewide-Education-Data-Needs>.

⁵⁴ John Armstrong and Christina Whitfield. (2016). State Higher Education Executive Officers. *The State of State Postsecondary Data Systems*. Available at: <http://postsecondarydata.sheeo.org/wp-content/>

[uploads/2018/05/SHEEO_StrongFoundations2016_FINAL.pdf](#).

⁵⁵ Office of Governor Gavin Newsom. (January 2019). Budget Summary: K-12 Education. Available at: <http://www.ebudget.ca.gov/2019-20/pdf/BudgetSummary/K-12Education.pdf>.

⁵⁶ Senate Bill 2. (2019). Statewide Longitudinal Student Database. Available at: http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB2.

⁵⁷ Unemployment Insurance Code: Section 1095. Available at: http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=1095.&lawCode=UIC.

⁵⁸ *Ibid.*

⁵⁹ Su Jin Jez. (Nov. 2016). *Increasing the Effectiveness of State Reporting Requirements and Student Disclosures for Private Postsecondary Institutions*. Available at: https://www.bppe.ca.gov/forms_pubs/reporting_requirements.pdf. High Technology Task Force. (2016). *Coding the Future: Recommendations for Regulatory Oversight in the High Technology Education Field*. Available at: https://www.bppe.ca.gov/about_us/ft_report.pdf.

⁶⁰ BPPE's enacting statute is not mentioned.

⁶¹ Bureau for Private Postsecondary Education. (Feb. 13, 2019). Advisory Committee Meeting Materials. Available at: https://www.bppe.ca.gov/about_us/meetings/materials/20190213_materials.pdf.

⁶² U.S. Department of Education. College Scorecard. Available at: <https://collegescorecard.ed.gov/>.

⁶³ U.S. Department of Education. (Sep. 14, 2016). Fact Sheet: *Obama Administration Announces Release of New Scorecard Data*. Available at: <https://www.ed.gov/news/press-releases/fact-sheet-obama-administration-announces-release-new-scorecard-data>; U.S. Department of Education (Aug. 10, 2018) *U.S. Department of Education Proposes Overhaul of Gainful Employment Regulations*. Available at: <https://www.ed.gov/news/press-release>.

⁶⁴ James Kvaal and John Bridgeland. (Jan. 2018). *Results for America. Moneyball for Higher Education: How States Can Use Data and Evidence to Improve Student Outcomes*. Available at: <https://results4america.org/tools/moneyball-for-higher-education-how-states-can-use-data-and-evidence-to-improve-student-outcomes/>.

⁶⁵ Diane Cheng. (Oct. 5, 2018). The Institute for College Access & Success. *Updates on the College Scorecard and mobile FAFSA since our sessions at the NCAN and NACAC conferences*. Available at: <https://ticas.org/blog/updates-college-scorecard-and-mobile-fafsa-our-sessions-ncan-and-nacac-conferences>.

⁶⁶ U.S. Department of Education and Federal Student Aid. Gainful Employment Operations Manual. Available at: <https://>

[ifap.ed.gov/GainfulEmploymentOperationsManual/attachments/GainfulEmploymentOperationsManualMasterFile.pdf](#).

⁶⁷ The UC can only be requested, rather than required, because of constraints in the structure of the California Constitution.

⁶⁸ Colleen Moore, Kathy Reeves Bracco, Thad Nodine, Camille Esch and Brock Grubb. (2018). Education Insights Center. *California Education Policy, Student Data, and the Quest to Improve Student Progress*. Available at: <http://edinsightscenter.org/Publications/Research-Reports-and-Briefs/ctl/ArticleView/mid/421/articleId/2198/California-Education-Policy-Student-Data-and-the-Quest-to-Improve-Student-Progress>.

⁶⁹ Data Quality Campaign. (March 5, 2015). *Key Elements for Strengthening State Laws and Policies Pertaining to Student Data Use, Privacy, and Security: Guidance for State Policymakers*. Available at: <https://dataqualitycampaign.org/resource/key-elements-strengthening-state-laws-policies-pertaining-student-data-use-privacy-security-guidance-state-policymakers/>.

⁷⁰ U.S. Department of Education. Family Educational Rights and Privacy Act (FERPA). Available at: <https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>.

⁷¹ National Public Safety Partnership. *The Fair Information Practice Principles (FIPPs) In the Information Sharing Environment (ISE)*. Available at: https://www.nationalpublicsafetypartnership.org/Documents/The_Fair_Information_Practice_Principles_in_the_Information_Sharing_Environment.pdf.

⁷² 20 CFR § 603.5. What Are the Exceptions to the Confidentiality Requirement? Available at: <https://www.law.cornell.edu/cfr/text/20/603.5>.

⁷³ U.S. Department of Education. *Privacy Technical Assistance Center: Data Security Checklist*. Available at: https://studentprivacy.ed.gov/sites/default/files/resource_document/file/Data%20Security%20Checklist_0.pdf; U.S. Department of Education. *Privacy Technical Assistance Center: Identity Authentication Best Practice*. Available at: https://studentprivacy.ed.gov/sites/default/files/resource_document/file/Identity_Authentication_Best_Practices_0.pdf.

⁷⁴ *Of Metrics and Markets*.

the institute for
college
access & success

1212 Broadway, Suite 1100
Oakland, CA 94612
510.318.7900

110 Maryland Ave, NE Suite 201
Washington, D.C. 20002
202.223.6060

info@ticas.org
www.ticas.org

**THE PROJECT ON
STUDENT DEBT**