

MEMORANDUM

TO: Don Francis, President, AICUP
FROM: Kate Shaw, Deputy Secretary for Postsecondary and Higher Education,
PDE
RE: Pennsylvania Information Management System (PIMS)
DATE: November 17, 2008

Thank you for providing PDE with a list of your Board's concerns and questions about the PIMS initiative. We appreciate the opportunity to address them and look forward to working with AICUP on this important issue moving forward.

Below I address each question, comment, and suggestion in the same order they were presented in your original memo of October 2 2008.

- 1) **Addressing privacy and security concerns:** Our response to the bulleted comments and suggestions follow:
 - We agree that it will be helpful to have a representative from AICUP on the statewide data council and look forward to AICUP representation on the council.
 - We agree that a document which guides and explains how data from PIMS will be used to inform educational practice and policy will be helpful and necessary. In cooperation with the statewide data council, we intend to develop such a document. If regular reports providing such information are deemed necessary a schedule for their release will be included in the document.
 - FERPA does require educational entities to destroy student records when the records are no longer useful for education purposes (e.g., evaluation and research). Generally states maintain that student records contained in their unit record system continue to retain their relevance for research and evaluation and therefore do not destroy any records.
 - PDE has an existing access and use policy that will guide the access and use of postsecondary PIMS data. We are open to input from AICUP and institutional representatives on the existing policy. A copy of the access and use policy is available here and will be provided to AICUP via e-mail:
http://www.edportal.ed.state.pa.us/portal/server.pt/gateway/PTARGS_0_2_33625_6_0_0_18/PIMS_Data_Access_Policy.pdf
 - As indicated in the access and use policy, once the data is submitted into PIMS it becomes the responsibility of PDE. PDE will therefore be liable in the event of a data breach and rather than the institutions.

- 2) **Addressing implementation costs concerns:** As indicated previously, it is our intention that PIMS will replace all or most of the current data collections conducted by PDE. A list of those collections is included below.

Collection Name	Scope	Rationale for Collection	Frequency	Type of Data Collected
Community College Annual Report	All community colleges	Legislated	Yearly, due in early Fall	Aggregate level student and faculty data
Act 101 Grant Programs	All Act 101 grantee institutions	Legislated; program monitoring	Yearly, due August 31 st	Student-level demographics and program participation data
Transfer and Articulation	35 institutions	Monitor if student credits are transferring	Yearly, due in early January	Aggregate collection including number of students transferred, credits successfully transferred and rejected
Technical College Program	TCP grantee institutions (currently 2)	Legislated; program monitoring	Yearly, due after June 30 th	To be collection of student-level demographics, program participation, courses and faculty-level data
Perkins	Technical Education students (52 institutions and 80,000 students)	Legislated; program monitoring	Yearly, due August 31 st	Student-level demographics and program participation data
Annual Collection of Programs	All colleges and universities	Program offerings and approval	Yearly	Collection of programs (i.e., majors) offered by each institution

Collection Name	Scope	Rationale for Collection	Frequency	Type of Data Collected
English Fluency Affirmation	All institutions	Legislated	Yearly, due September 1 st	Each institution must complete a form indicating that all of their recently hired instructional faculty are fluent in the English language
Pennsylvania Resident Graduation Rate Survey	All four year institutions, public and private (104 institutions)	Legislated	Yearly	Aggregate collection of the number and percentage of first-time, full-time students who graduate in the “appropriate” (four or five years) time for their program
PDE Residence of Students	All institutions (183)	Requested by PHEAA	Every other year	Aggregate-level student enrollment, graduation and degree data

We realize that there will be implementation costs and some on-going costs to institutions. The costs will vary by institutional type, the number of students enrolled, the capacity of the institutions’ data offices, the type of software that is used, and other factors. The costs will certainly diminish after the first year as procedures are developed, coding is completed, and staff become accustomed to submitting the data. PDE desires to limit the cost as much as possible and hopes that the system that is developed ultimately benefits the institutions by providing them with useful data and a way of showing to the state the quality job they are doing in educating their students.

PDE is currently positioned to provide significant support to institutions as they work to submit data into PIMS. For example:

- Pre-Implementation Support
 - PAsureID training and documentation
 - Will be conducting a pilot PIMS implementation during Spring 2008 with a small group of institutions
 - PIMS user manual containing template file specifications
 - PIMS template file training
 - Regular communication (conference calls, webinars) with institutions and their SIS vendors
 - Training on PIMS data submission and reporting
 - For institutions without a commercial SIS, a “PIMS template editor” (MS Access database) will be available

- Post-Implementation Support
 - Continued communication and support of institutions and vendors as data subject areas (templates) are phased in over the course of school year 2009-2010
 - Help desk for operational support

The number of times data is collected by PDE per academic year from the private institutions is an issue that will be worked out with the institutions. The submission schedule referenced by AICUP applies only to the PASSHE and community college institutions.

- 3) **Addressing purpose, scope, and access concerns:** The data dictionary provided to AICUP provides the data elements that the PIMS system will have the capacity to collect. However, the exact data elements that the private institutions will report on will be developed collaboratively with input from the institutions themselves. It is not our expectation that each sector of higher education will report on the same number of data elements.

The institutions themselves will have access to the individual student records of the students they own (those enrolled at their institutions and on whom they reported data). They will also have access to additional data as specified in the Access and Use policy. Further detail is provided in the Access and Use policy.

The Access and Use policy referenced above provides some information on how the data may be used. The actual reports that will be generated by PDE using PIMS have not been determined and will not be determined until we have received significant input from the field, including: institutional representatives, AICUP and other associations, and other interested parties and stakeholders. However, we can say that the data will only be used to answer critical policy questions. For example:

- What proportion of our graduating seniors go on to postsecondary education?

- At what point are students exiting the educational pipeline and what factors contribute to their exit?
- What factors help students move successfully through key transition points in the education career, such as enrolling in college, transferring from two- to four-year colleges, or entering the workforce?
- What curricular or environmental factors affect student progress through the education career?
- What is the relationship between student ability to complete college and high school grades and test scores?
- What role does geographic mobility play in students' educational attainment?

At the postsecondary level we also believe that our discussions around what type of reporting will be done by PDE ought to be guided by certain principles. For example:

- The data needs to be used in such a way that it helps create better institutional and state policy;
- Institutional differences must be respected;
- Differences that exist between sectors must also be respected;
- Reports must address critical issues;
- Reports must provide useful information to the proper audiences;
- Reporting and data use must be in compliance with PDE Data Access and Use Policy, FERPA and other applicable state and federal regulations.

As previously indicated, the actual reports that PDE will generate will be developed in cooperation with other entities.

At this point what we desire from AICUP, and the institutions themselves, is a commitment to assist us in the development of the system as it relates to the independent institutions, with the intention that what is ultimately developed is something the colleges and universities find useful and so that it is something they desire to become a part of. We are at the very beginning of this process and clearly there are many details to be worked out. However, we want to proceed in a collaborative manner in finding answers to those questions and in developing the overall system.

We appreciate AICUP engaging with us on this important issue and hope that we can work together to develop a system that will benefit the Commonwealth, the institutions that participate, and most importantly the students we serve.