



U.S. DEPARTMENT OF EDUCATION  
INSTITUTE OF EDUCATION SCIENCES

NATIONAL CENTER FOR EDUCATION STATISTICS

**Public Comments and NCES Responses on the Proposed  
College Affordability and Transparency Explanation Form (CATEF) 2011-2014**

**Comment 1:**

To whom it may concern:

I am writing in regards to the reporting requirements for the College Affordability and Transparency Explanation Form 2011-2014 proposed by the National Center for Educational Statistics (NCES). My comment/request is a straightforward one: The form asks whether the net increases in tuition and fees at the college were due to "reporting inaccurate data to IPEDS." The institution that answers this question in the affirmative is then asked to provide an explanation of what steps have been put in place to assure that the institution will provide accurate and timely IPEDS data in the future. However, what is not made clear is whether the rest of the requested information is required for that institution. Is that institution required to continue with the form and provide all of the information requested even though its cost increases were in error? Or is the institution's response complete at that point? It would seem prudent and even beneficial that the requested data from such an institution not be included in the NCES summary report.

Thank you.

Marla Smith  
Institutional Research Coordinator  
Mitchell Technical Institute

**Response 1:**

Dear Ms. Smith:

I am writing in response to your comment from November 10, 2011, regarding the National Center for Education Statistics' application for a three-year clearance for the College Affordability and Transparency Explanation Form (CATEF). First, let me thank you for your interest and also for the service you provide for the data collection by serving as an IPEDS keyholder for Mitchell Technical Institute.

In reference to your question: If an institution indicates that the three-year increases in tuition and fees and/or net price at the institution were incorrect due to reporting inaccurate data to IPEDS, the institution will only have to fill out the information on the first screen through question three. The institution's response will be complete once they have entered a description of the steps that have been put in place to improve the reporting of accurate data to IPEDS in a timely manner. The institution will not be able to provide any other information to be used in the summary report regarding increases in expenses or decreases in revenues on the CATEF. However, information on the inaccurate reporting of data and the steps institutions are taking to improve IPEDS data reporting may be included in the summary report.

Thank you for the opportunity to respond to your concerns, and for serving as an IPEDS keyholder. We appreciate your support.

Sincerely,

Elise S. Miller  
Program Director  
Postsecondary Institutional Studies Program

**Comment 2:**

To whom it may concern:

As an institution included on the list for being in the top 5% of institutions in its sector with the highest increase in net price from 2007 to 2009, I would like to have the opportunity to explain in the survey why this occurred. For example, our institution key holder identified in 2008-09 that we had incorrectly reported data for 2006-2007. We were unable to resubmit that data. However, we began reporting correctly as of 2008-2009. The result of accurately reporting the data for 2008-09 resulted in an erroneous net price increase. Our net price increase was actually 15% rather than 231% increase.

Thank you,

**Tonya Buttry, PhD, RN**  
**President**  
Southeast Missouri Hospital College of Nursing & Health Sciences  
2001 William Street, Cape Girardeau, MO 63703

**Response 2:**

Dear Dr. Buttry:

I am writing in response to your comment from November 14, 2011, regarding the National Center for Education Statistics' application for a three-year clearance for the College Affordability and Transparency Explanation Form (CATEF). First, let me thank you for your feedback on the proposed CATEF data collection.

We understand that you would like to provide information other than that which is directly requested on the proposed survey form. In order to do this, on the first survey screen for "General information," your institution would indicate "Yes" to the third question asking if the three-year increase in tuition and fees and/or net prices was incorrect due to reporting inaccurate data to IPEDS, as you noted in your e-mail. Then in the box below you could explain why the data were incorrectly reported and then describe the steps that have been put in place to improve the reporting of accurate data to IPEDS in a timely manner.

Your comment indicated that the institution realized in 2008-09 that the data that were reported in 2006-07 were incorrect, and that you reported correct data beginning in the 2008-09 data collection. Please note that the data used for the College Affordability and Transparency list were reported in the 2009-10 collection. The 2009-10 data collection included the reporting for the three preceding years of data: 2006-07, 2007-08, and 2008-09. Therefore, the explanation provided in your comments would not adequately explain how the data were misrepresented. You may want to revisit the issue with your IPEDS keyholder.

Please also note that IPEDS keyholders had several opportunities to review and revise, if necessary, the data submitted in 2009-10 data collection. In addition to the edits that are built into the survey screens, NCES sent the IPEDS Data Feedback Report to all presidents and keyholders in the Fall comparing your institution's data to a set of peers. Later in the fall, NCES sent an email to all IPEDS keyholders strongly encouraging them to review the data that had been posted on the College Navigator site. Finally, NCES made available the Prior Year Revision System for keyholders to correct any data throughout the 2010-11 collection year.

Lastly, we would recommend that you review the data your institution reported during the 2010-11 data collection, as it will be used to create next year's lists. As president of your institution, you should have recently received in the mail a copy of your institution's IPEDS Data Feedback Report. Figures in that report show both net price and tuition and fees for 2007-08, 2008-09, and 2009-10, as reported in 2010-11. Your institution's keyholder has until January 15, 2012 to make revisions to the 2010-11 data submission using the prior year revision system available at [https://surveys.nces.ed.gov/ipeds\\_py/](https://surveys.nces.ed.gov/ipeds_py/).

Thank you for the opportunity to respond to your concerns.

Sincerely,

Elise S. Miller  
Program Director  
Postsecondary Institutional Studies Program

### **Comment 3:**

***The University of Mississippi wishes to make the following comments regarding the College Affordability and Transparency Explanation (CATE):***

The IPEDS "College Affordability and Transparency Explanation Form" for collecting information regarding net price increases does not allow an institution to fully explain all factors that significantly impact net price increases. We respectfully request that the form be revised to allow institutions to provide complete and accurate explanations of changes in net price, as illustrated below.

On question 3, schools are asked whether "the three-year increases in tuition and fees and/or net prices (was) due to your institution reporting inaccurate data to IPEDS." This survey item then directs respondents down one of two paths. The assumption is that the reason for increases is because of either (1) poor data gathering OR (2) financial management problems (more spending, less revenue - resulting in price hikes for the consumer).

For an institution like the University of Mississippi, however, neither category fits. Our reporting was *not* inaccurate. But answering "no" to question 3 means that we will need to analyze all cost areas and revenue sources - and provide full explanations for the highest increases.

Yet the primary reasons why the University of Mississippi made the net price list for 4-year public schools have nothing to do with these matters. Instead, they are:

- The Office of Financial Aid launched a student survey during 2006. It was a conscientious effort to determine the actual costs that our students were experiencing and thereby better inform them about the costs they should expect. We found that the survey feedback was especially helpful for examining things like off-campus living costs, which are higher. Previously, we had provided on-campus housing figures only. Beginning 2007-08, this survey is now routinely factored into the estimated costs of attendance provided to students. So our cost "changes" were not due to any significant institutional

pricing increases, but because of a different *model* for estimating expenses. Bottom line, it was just better information - allowing students and families to plan more realistically for college. This is exactly what “transparency” is supposed to be about.

- Our 2006-07 scholarship/grant average was higher than usual, making the net price for that academic year significantly lower. During that year, our institution received Federal Disaster SLEAP funds to assist students and their families who had been financially affected by Hurricane Katrina. Approximately \$1 million of this SLEAP money was awarded to first-time students from Mississippi (who are in the cohort used by NCES for the net price calculations). 2006-07 was the last time SLEAP was provided. As a result, the year-to-year comparisons were atypical.

It is unfortunate that our institution was flagged for the highest net price list because (1) we tried to better educate our public and (2) we served victims of a national disaster.

In our case, the analysis required to complete Section 2 and beyond on the new form is irrelevant.

We recommend that question 3 be revised as shown below. If you are providing information in the explanation box for 3d, then you should not have to proceed to Section 2.

3. a. Was the three-year increase in tuition and fees and/or net prices due to your institution reporting inaccurate data to IPEDS?

No  Yes

a. If you answered “Yes” to 3a, then please describe the steps that have been put in place to improve the reporting of accurate data to IPEDS in a timely manner.

c. If you answered “No” to 3a, was the three-year increase due to factors that were exclusively beyond the institution’s control AND unrelated to institutional cost increases?

No  Yes

a. If you answered “Yes” to 3c, then please describe the factors that were responsible for the increase.

b. If you answered “No” to 3c, then proceed to Section 2.

In addition, it appears asking for the three-year change in FTE student enrollment in Section 2.C would be useful whether or not it directly led to net price increases. We suggest asking for these data and then subsequently asking whether or not it impacted net price .

***In summary, national efforts to inform the public about college costs are important and timely, but must also be clear and accurate. The University of Mississippi wants to be sure that the process of learning about increasing college costs covers all cases. We appreciate the opportunity to comment on the proposed form and sincerely hope it will be revised so that institutions may provide accurate and full explanations of factors leading to net prices increases.***

***Sincerely,  
Mary Harrington***

Response 3:

Dear Ms. Harrington:

I am writing in response to your comments from November 15, 2011 regarding the National Center for Education Statistics' application for a three-year clearance for the College Affordability and Transparency Explanation Form (CATEF). First, let me thank you for your feedback on the proposed data collection and also for the service you provide for the data collection by serving as an IPEDS keyholder for the University of Mississippi.

In your comments, you suggest that we revise the proposed survey form because it includes the assumption that the reason for increases in tuition and fees/ net price are because of either (1) poor data gathering OR (2) financial management problems. The proposed form includes questions regarding institutional finances as outlined in the Higher Education Opportunity Act (HEOA). In addition, NCES added questions, such as whether the increases in tuition and fees/net prices were based on inaccurate reporting to IPEDS, due to feedback provided by institutions when the College Affordability and Transparency lists were posted in the summer. The results of the CATEF will be used to inform Congress and the public of the conditions institutions have been operating under that may have contributed to increases larger than most institutions' increases in student charges in recent years. Finally, the form includes several text boxes through which institutions can provide additional information regarding why tuition or net prices increased that is not captured in the data being provided.

In addition, based on the comments we have received, we will add a fourth question to the first screen of the CATEF for institutions on the net price increase lists to indicate if the increase in net price was the result of a change of the institution's methodology for calculating student budgets (cost of attendance) over the 2007 to 2009 time period. The institution will need to provide a detailed explanation of why the institution changed the methodology, as well as the differences between the previous methodology and the new one. NCES will review the information provided as part of the data collection process. This review is necessary due to concerns that what some institutions consider to be a change in methodology is actually the institution reporting data inaccurately. If NCES staff determines that the increase in net price was due to a legitimate change in methodology, and not inaccurate reporting, then the CATEF submission for that institution will be considered complete. If NCES staff determines that the methodological explanation provided indicates inaccurate reporting, then the institution's keyholder will be contacted to discuss the information further and resolve any concerns raised by NCES staff.

I would also like to provide guidance on how your institution would complete the CATEF survey if the change in methodologies was not the reason for the increase in net price, but was related instead to the Federal Disaster SLEAP funds. To address the SLEAP funds, in section 2b you would indicate a decrease in revenue from federal sources. In the last box of section 5, you would provide the details of the federal student grants for the SLEAP which were only provided in 2006-7 causing the net price for that year to be atypically low, which in turn caused the increase in net prices to be high for your institution's sector. This information would be relevant to

policymakers and the public to help understand the complexities of both institutional finances and net price calculations.

Finally, we included the question about FTE student enrollment based on feedback from institutions which indicated that in many cases the total institutional expenses and revenues had not changed over time, yet those funds had not kept up with enrollment growth. Therefore, it was important to include the change in expenses and revenues per FTE student and capture the standalone amount of the enrollment changes. Institutions that indicate that their tuition and fees/net prices have been impacted by changes in enrollment will have to include an explanation in the last box of section 5; that explanation box is also where any other information institutions think is pertinent is collected. While information on changes in FTE student enrollment are interesting pieces of information, these data can be easily obtained directly from IPEDS and it would be unnecessarily burdensome to have institutions report on such data if they did not think it was related to increases in tuition and fees/net prices.

Thank you for the opportunity to respond to your concerns, and for serving as an IPEDS keyholder. We appreciate your support.

Sincerely,

Elise S. Miller  
Program Director  
Postsecondary Institutional Studies Program

**Comment 4:**

I am currently in the process of reviewing the Explanation Form.

Our school is on the list of schools who had a significant change in net price. For the years that are being reported we increased our Financial Aid Cost of Attendance to align with the real costs that student have for living expenses while in school. The institutional increase in tuition was minimal in the years that are causing us to show up on the College Affordability and Transparency Center.

The reason that our net price appears to have increased is because we increased our financial aid budgets to accurately reflect the living expenses that students have who attend our university. The Explanation Form does not give us the opportunity to explain this. In section 2 of the form we are given options to select for the items that caused our price to increase. None of these options addresses the issue of our cost of attendance budget change. This area only asks about institutional administrative costs. These were not the reason that our reported costs are higher.

The college navigator site should also indicate that the main reason for the our increase is not institutional costs, but a more accurate reflection of living expenses.

I would like to be able to discuss this form with someone. Please provide contact information.

Thanks,

Jerome Wichert  
Director of Student Financial Services  
Southwestern Oklahoma State University

Response 4:

Dear Mr. Wichert:

I am writing in response to your comments from November 15, 2011 regarding the National Center for Education Statistics' application for a three-year clearance for the College Affordability and Transparency Explanation Form (CATEF). First, let me thank you for your interest and thoughtful feedback on the proposed data collection.

The cost of attendance budget change you have described at Southwestern Oklahoma State University should be addressed in one of two ways for the CATEF collection. It is unclear from your comments whether your institution has changed the way it determines the cost of attendance that has been reported to IPEDS and used in the net price calculations or if the institution has increased the amount of financial aid it is providing to students to counterbalance increased living expenses.

Based on the comments we have received, we will add a fourth question to the first screen of the CATEF for institutions on the net price increase lists to indicate if the increase in net price was the result of a change of the institution's methodology for calculating student budgets (cost of attendance) over the 2007 to 2009 time period. The institution will need to provide a detailed explanation of why the institution changed the methodology, as well as the differences between the previous methodology and the new one. NCES will review the information provided as part of the data collection process. This review is necessary due to concerns that what some institutions consider to be a change in methodology is actually the institution reporting data inaccurately. If NCES staff determines that the increase in net price was due to a legitimate change in methodology, and not inaccurate reporting, then the CATEF submission for that institution will be considered complete. If NCES staff determines that the methodological explanation provided indicates inaccurate reporting, then the institution's keyholder will be contacted to discuss the information further and resolve any concerns raised by NCES staff.

However, if it is the case that your institution has been providing more financial aid to students to address issues of cost of living, more so than a change in calculating the cost of attendance, then in section 2 of the form you would indicate the percentage increase in the category of institutional student grant aid. Then in section 3, you would explain why the institutional student grant aid amounts have increased; in section 4, you would describe the steps, if any, that the institution has taken to reduce those costs. If the institution is committed to providing the necessary financial aid to students, you should indicate that you have not attempted to reduce those costs. However, it should be noted that while the finance data reported in IPEDS does show an increase in net scholarships and fellowships expenses from 2007 to 2009, in the scholarships and fellowships section (Part E) of the IPEDS Finance component, the institution has not reported any dollar amounts for either restricted or unrestricted institutional grant aid.

Your comments noted the following:

In section 2 of the form we are given options to select for the items that caused our price to increase. None of these options addresses the issue of our cost of attendance budget change. This area only asks about institutional administrative costs. These were not the reason that our reported costs are higher.

To clarify, the instructions for section 2 of the form provide the instructions to "check the boxes that best describe the five major areas in your institution's budget with the greatest cost (expenses) increases over the three-year period"—it does not specify that these cost increases have directly caused the increases in net prices. Furthermore, the expense areas listed for section 2 are not limited to institutional administrative costs and institutions do also have the option to provide "other" expense areas if they feel that options listed do not cover areas where the institution has had cost increases.

Additionally, the data Southwestern Oklahoma State University submitted on the IPEDS Finance survey for the 2007 to 2009 academic years *does* indicate that your institution has increased its spending in a number of areas

other than institutional student grant aid. There have been increases in the functional expense categories of instruction, research, public service, student services, academic and institutional support, and auxiliary enterprises. Portions of the increases in expenditures have been for salaries and fringe benefits, which should be indicated in section 2 if the data you reported for net prices were accurate.

Your comments also noted that "The college navigator site should also indicate that the main reason for the increase is not institutional costs, but a more accurate reflection of living expenses." However, your institution *did* have the opportunity to include any additional context notes to be posted on the College Navigator website when the net price data were reported, but your institution opted not to include any contextual notes. You might want to revisit this issue with your institution's IPEDS keyholder.

Thank you for the opportunity to respond to your concerns,

Sincerely,

Elise S. Miller  
Program Director  
Postsecondary Institutional Studies Program

#### **Comment 5:**

Having reviewed this collection instrument, I notice that Q1 has a built-in assumption that may make some institutions unable to answer it, though they're going to be required to. The assumption is that expenses have increased at all institutions. Theoretically, expenses could "not" have increased, yet institutions must respond showing that some expense category has increased, or the form cannot be completed. This question should be modified so that it will be applicable to all potential financial circumstances.

Christina (Tina) Leimer, PhD  
Associate Vice President for Institutional Effectiveness  
California State University, Fresno

#### **Response 5:**

Dear Dr. Leimer:

I am writing in response to your comment from November 15, 2011, regarding the National Center for Education Statistics' application for a three-year clearance for the College Affordability and Transparency Explanation Form (CATEF). First, let me thank you for your feedback on the proposed CATEF data collection.

The questions appearing on the proposed CATEF survey stem directly from the requirements listed in the Higher Education Opportunity Act. The first requirement for this collection is that the institutions must report, "A description of the major areas in the institution's budget with the greatest cost increases." To clarify, in section 2 of the form, an institution must indicate a minimum of one budget area and a maximum of five budget areas that have increased over the three-year period (from 2008 to 2010 for your institution). However, if an institution does not have an increase in a single budget area then they would indicate the budget area that has not increased, or that has decreased the least (with a corresponding negative percent change) and complete the rest of the survey form.



The CATEF online data collection will have built-in edits, similar to the IPEDS data collection, which would be triggered when anything other than a positive amount is reported in this area. The person entering the information will be directed to review the data they have entered and contact National Center for Education Statistics (NCES) staff if the data they have entered are indeed correct. NCES staff will then review that institution's previously reported IPEDS Finance data to check that the institution did not have any increases in expenses over the time period. If the institution had no increases in any expenditure category, then they will be able to submit their completed form.

In the case of California State University, Fresno, the IPEDS Finance data previously submitted to IPEDS for FY2008, FY2009, and FY2010 indicate that expenses have increased in a few areas. For example, total research expenditures have increased by 275 percent over the three year period. Additionally, net scholarships and fellowship expenses have increased by 75 percent. And while it is a low growth rate, the data do show that employee fringe benefits have increased by 3 percent from 2008 to 2010. To view these previously reported data for your institution, please go to the IPEDS Data Center available from <http://nces.ed.gov/ipeds>.

We understand that the expenditure increases an institution indicates in the first section of CATEF may not be the cause for rising costs to students. However, we are still required to collect these data. Fortunately, throughout the rest of the CATEF, institutions can and should provide a more complete picture of how their financial situation has changed in recent years in a number of ways, and how those changes have affected the prices charged to students.

Thank you for the opportunity to respond to your concerns.

Sincerely,

Elise S. Miller  
Program Director  
Postsecondary Institutional Studies Program

#### **Comment 6:**

I am writing in reference to :

[\(04729\)](#) 1850-NEW-v.1 College Affordability and Transparency Explanation Form (CATEF) 2011-2014

The survey instrument assumes program costs have increased over the 3-year period. What if program costs have decreased?

Section 2: Cost Increase Description instructs: **At least one box above must be checked before you will be able to fill out the next section.**

Are negative entries allowed in this section? If not, then we will have a problem completing this form.

CSU will include this in its comments regarding the survey instrument.

Rodney M. Rideau  
Budget Director  
CSU Chancellor's Office

## Response 6:

Dear Mr. Rideau:

I am writing in response to your comment from November 14, 2011, regarding the National Center for Education Statistics' application for a three-year clearance for the College Affordability and Transparency Explanation Form (CATEF). First, let me thank you for your feedback on the proposed CATEF data collection. We also received a similar comment from the CSU Fresno campus.

The questions appearing on the proposed CATEF survey stem directly from the requirements listed in the Higher Education Opportunity Act. The first requirement for this collection is that the institutions must report, "A description of the major areas in the institution's budget with the greatest cost increases." You are correct that in section 2 of the form an institution must indicate a minimum of one budget area and a maximum of five budget areas that have increased over the three-year period (from 2008 to 2010 for your institution). However, if an institution does not have an increase in a single budget area then they would indicate the budget area that has not increased, or that has decreased the least (with a corresponding negative percent change) and complete the rest of the survey form.

The CATEF online data collection will have built-in edits, similar to the IPEDS data collection, which would be triggered when anything other than a positive amount is reported in this area. The person entering the information will be directed to review the data they have entered and contact National Center for Education Statistics (NCES) staff if the data they have entered are indeed correct. NCES staff will then review that institution's previously reported IPEDS Finance data to check that the institution did not have any increases in expenses over the time period. If the institution had no increases in any expenditure category, then they will be able to submit their completed form.

We understand that the expenditure increases an institution indicates in the first section of CATEF may not be the cause for rising costs to students. However, we are still required to collect these data. Fortunately, throughout the rest of the CATEF, institutions can and should provide a more complete picture of how their financial situation has changed in recent years in a number of ways, and how those changes have affected the prices charged to students.

Thank you for the opportunity to respond to your concerns; we appreciate your feedback.

Sincerely,

Elise S. Miller  
Program Director  
Postsecondary Institutional Studies Program