BEST PRACTICES GUIDE

RECENT GRADUATES EMPLOYMENT AND EARNINGS SURVEY

November 2015

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PREFACE

The Recent Graduates Employment and Earnings Survey (RGEES) is for use in appealing the average earnings of graduates from programs subject to the Gainful Employment Regulations. This appeal is intended for institutions who seek to demonstrate that their graduates' true earnings are greater than those used in the Department of Education's Debt-to-Earnings Ratio calculation.

This Best Practices Guide contains recommendations to help institutions administer the RGEES to appeal the earnings data used in the Debt-to-Earnings Ratio calculated by the Department of Education. This document is not prescriptive, and you do not have to follow all of these instructions as part of implementing the survey. Specific regulatory requirements can be found in the Gainful Employment Regulations, located here, and mandatory survey standards are listed in the *Standards for Conducting the Recent Graduates Employment and Earnings Survey* document located in Appendix A.

The questions in the RGEES are based on standard federal survey items on earnings and have undergone additional testing with recent graduates. While many institutions may already survey graduates, following the strategies and advice provided in this document will help increase response rates and promote the collection of high quality data.

This document contains information about private organizations for the reader's convenience. The inclusion of website names or addresses for particular services does not constitute an endorsement by the U.S. Department of Education of any views expressed, or products or services offered.

TERMINOLOGY

- Debt-to-Earnings Ratio: the ratio of the median loan debt to the mean or median annual earnings or discretionary income of the students who completed the program during the cohort period.
- **Documentation** (as used in the Gainful Employment regulations) See Appendix A.
- Gainful Employment program: In the context of these regulations, Gainful Employment refers to programs that "are required by statute to provide training that prepares students for gainful employment in a recognized occupation" (79 Fed. Reg. 64,890).
- Independent audit**:** all appeals must first be approved by an independent auditor. The auditor will be charged with assessing whether the survey appeal conformed to the *Standards for Conducting the Recent Graduates Employment and Earnings Survey.*
- Nonresponse bias**:** the relationship between the likelihood that an individual will participate in the survey and the characteristics measured by the survey; the difference between survey respondents and the entire surveyed population.
- Personally identifiable information (PII)**:** information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.
- Recent Graduates Employment and Earnings Survey (RGEES): a survey developed by the Department of Education that institutions can use to collect and present their own findings about average graduate earnings for the Department of Education to consider in the calculation of the Debt-to-Earnings Ratio.
- **RGEES Platform:** a web-based survey tool developed by the Department of Education and provided to institutions to make the collection of graduate earnings easier for institutions that choose to appeal.

USE THE STANDARDS TO GUIDE YOUR PROCESS

All institutions considering an appeal should first read the *Standards for Conducting the Recent Graduates Employment and Earnings Survey* (**Appendix A**). **If your institution does not follow these prescribed standards, your appeal will not be successful.** This Best Practices Guide will identify relevant standards where applicable. Each of the eight standards relate directly to the Recent Graduates Employment and Earnings Survey (RGEES):

Standard 1: Planning Your Data Collection

The survey design components required to conduct the RGEES include a plan that addresses the objectives of the survey, the survey design, the data collection plan, the confidentiality pledge, a data security plan, and the human and fiscal resources and time needed to achieve high data quality.

Standard 2: Data Collection Methodology

Administer data collection instruments and methods in a manner that achieves the best balance between maximizing data quality and controlling measurement error, while minimizing respondent burden using best practices established in the field of survey methodology.

Standard 3: Maintaining Confidentiality

Federal law requires that the confidentiality of data that contain information about individuals (i.e., personally identifiable information or PII) must be protected (20 U.S.C. 1232g). Anyone who will have access to the information must understand the importance of protecting the confidentiality of the survey respondents' information, be cognizant of the requirements of the law, and monitor the confidentiality of PII in their daily activities and in the release of information to the public. Steps must be taken throughout the data collection, processing, and reporting activities to ensure that data are handled in such a way as to avoid disclosure of PII.

Standard 4: Data Editing

Data editing will be used to correct inconsistent data in the RGEES data. Specifically,

- Negative values for any of the income questions will be replaced with zeroes (i.e., 3a, 3b, 4a, and 5a).
- When the total income is calculated, values over $999,999 will be replaced with $999,999 (i.e., sum of 3a, 3b, 4a, and 5a).

Data editing will be done automatically by the RGEES Platform. If the RGEES Platform is not used, then edits parallel to those used by the RGEES Platform must be applied, and no other edits will be permitted.

Standard 5: Calculation of Response Rates

Surveys must be designed and conducted to achieve the highest practical rates of response to ensure that survey results are representative of the list of recent graduates who received Title IV assistance so that they can be used with confidence to reflect the employment status and earnings of the Title IV-assisted recent graduate cohort. Nonresponse bias analysis must be conducted when response rates or other factors suggest the potential for bias to occur.

As a minimum requirement, at least one half of the recent graduates surveyed for a specific program must submit a completed survey. That is, the response rate for an individual program must be at least 50 percent for the data to be used to support an appeal under the Gainful Employment Regulations appeal process.

Standard 6: Nonresponse Bias Analysis

The potential impact of nonresponse on the quality of information obtained from the survey must be taken into consideration. Nonresponse bias is a serious problem and occurs when there is a correlation between the likelihood of participation in the survey and the responses to the survey variable(s) being measured. Survey estimates may be biased if those who choose to participate (respondents) differ substantially and systematically from those who choose not to participate (nonrespondents). If these differences are related to employment status or earnings, the results from the RGEES may be misleading or even erroneous. The nonresponse bias analysis can indicate the potential impact of nonresponse bias. A nonresponse bias analysis must be conducted if the unit response rate is between 50 percent and 80 percent.

Nonresponse bias is assessed by comparing respondents and nonrespondents on information available from graduates' student records. Analysis of recent program level data identified three variables that are easily verified in student records and are correlated with earnings: graduates with Pell grants, graduates with a zero expected family contribution, and graduates who are female. A nonresponse bias analysis examines these attributes of the program graduates to determine whether response rates are related to those attributes and/or whether the characteristics of respondents and nonrespondents differ on these characteristics.

If excluded cohort members that are not part of the finalized cohort list that the U.S. Department of Education submitted to the Social Security Administration to obtain the cohort earnings data are added to the list of graduates, the student attribute data for those graduates should be included in the data set prior to conducting the nonresponse bias analysis. (If the RGEES platform is used, data for these graduates should be added to the RGEES data base. If the RGEES platform is not used, these counts should be included in the nonresponse bias analysis.)

As a minimum requirement, the average relative bias due to nonresponse in the data for recent graduates surveyed for a specific program must not exceed 10 percent. That is, the average relative bias computed over the percent of graduates who received a Pell grant, the percent with a zero expected family contribution, and the percent female within an individual program must not exceed 10 percent in order for the earnings data from RGEES to be used to support an appeal under the Gainful Employment Regulations appeal process.

Standard 7: Calculating the Mean and Median

Established procedures must be used to compute the mean and median of the earnings data collected using the RGEES.

Standard 8: Documenting A Survey System

Complete documentation must be developed for each program that uses the RGEES in an appeal of the program's graduates' earnings under the Gainful Employment Regulations. Documentation includes those materials necessary to replicate and evaluate each survey.

PLANNING THE SURVEY

There are many steps you can take to make data collection and reporting easier. To begin with, identify key institution staff who will be involved in the RGEES and involve them as you decide whether or not you will survey your graduates either electronically or through the mail. Tell them the purpose of the survey and communicate the process, timeline, and types of information needed for the survey.

Remember that the U.S. Department of Education has provided the survey questions to use (see **Appendix B**) and the *Standards for Conducting the Recent Graduates Employment and Earnings Survey* (see **Appendix A**), which must be followed regardless of the survey mode. The Department of Education is also providing a survey platform that will facilitate your administration of the survey over the Internet and will also perform the statistical calculations and data documentation necessary to complete a successful appeal (see **The RGEES Platform** section under Data Collection for more information). As you plan, specifically consult **Standard 1: Planning Your Data Collection** in the *Standards for Conducting the Recent Graduates Employment and Earnings Survey* in order to fully comply with the requirements for the appeal.

Early on, use your institution's website and other means to reach graduates and raise their awareness of the RGEES and its purpose. Consider working with relevant professional associations and licensure agencies to advertise the RGEES in different settings. Share strategies that work with institutions that survey graduate populations similar to yours.

Please keep in mind that it may take several attempts to contact graduates, so you need to start your survey early enough to ensure that the data collection period is of adequate and reasonable length.

LOCATING GRADUATES

Locating graduates is challenging for any institution attempting to survey graduates. Despite the cost, collecting or verifying locating information at the beginning of the study can help institutions conduct a successful appeal under tight data collection timelines. Ideally, institutions will create and maintain an up-to-date list of e-mail addresses, mailing addresses, and phone numbers (mobile, home, and work, if possible) to provide more than one way to contact graduates. Sending an update contact information card or e-mail every 6 months will keep contact information current (see **Appendix C** for a customizable example). Timing these contacts to align with graduates' birthdays, the anniversary of their graduation, or other memorable dates may increase the chance they respond. Always provide return postage to make it easier for graduates to return their response.

Many third-party vendors specialize in locating specific populations. Consider using these tracing services to locate program completers if your institution does not have current contact information. Be aware that these providers charge a fee for providing contact information, and institutions wishing to use these services must bear the cost. Despite the cost, it is probably a worthwhile investment for institutions conducting an appeal. Before contracting with a third party, check to see if the vendor provides the specific contact information needed for the mode you are using to survey graduates (that is, e-mail address for electronic surveys or mailing address for mailed surveys). For institutions using mailed surveys, providers with access to the National Change of Address registry can provide mailing addresses. Following are some companies that provide tracing services, although this list is not exhaustive:

- Experian - https://annualcreditreport.experian.com/products/address_update.html
- LexisNexis Accurint - http://accurint.com/
- Spokeo - http://www.spokeo.com/
- Intelius - http://www.intelius.com/
- PeopleFinders - http://www.peoplefinders.com/

BEST PRACTICES IN PLANNING THE SURVEY

*[Practices related to **Standard** 1, including parts 1–10*

- Communicate with key institution staff the reason you are conducting the RGEES, along with the process, timeline, and types of information needed.
- Promote the survey to potential respondents ahead of time using institution and program websites.
- Collect and maintain contact information.
  - Have multiple types of contact information available.
  - Consider using a fee-based tracing service to locate graduates for whom contact information is unavailable.

CONTACTING GRADUATES

Before sending a survey, institutions should contact graduates to build rapport and familiarize them with the survey. First, consider the specific population of graduates you will be surveying and their technological and behavioral habits. People who work directly with your students are the best source of these details, so consult faculty and administrators for the program in question. Consider sending a notification about the coming survey. You can inform graduates by sending letters signed by a senior administrator in the program, including a flyer with a set of frequently asked questions that recipients might have about the survey. Examples of such literature can be found in **Appendix D** (for a first-contact postcard template), **Appendix E** (for an e-mail or letter template describing the survey), **Appendix F** (for a follow-up e-mail or letter template), and **Appendix G** (for an FAQ flyer).

No matter how you contact your graduates, inform them right away of the goals of the RGEES, that they have been selected to participate due to their affiliation with the particular program, and how their data will be used. Be sure to use an institution and program name that they will recognize.

Your institution should set up a help desk that survey respondents can easily reach with a specific e-mail address or toll-free number if they encounter difficulties or need guidance while completing the survey. Staff at this number can guide graduates through completing the survey and even to collect survey responses over the phone.

Maximize Participation

To maximize participation, make clear to contacted graduates that the survey will be of no cost to them personally and that their participation can only help your appeal process. Be respectful of the graduates' wishes and possible time constraints. Let them know immediately how long it will take and that the information they provide will be used as part of the appeals process only.

The following graph is an example of the response pattern you may see after each respondent contact your institution makes. The dark green represents e-mail contacts/reminders, and the lighter green represents postcards and reminders mailed to graduates' home addresses. These are not exact numbers, but it is a graphical representation of the response levels you may see with each contact.[1]

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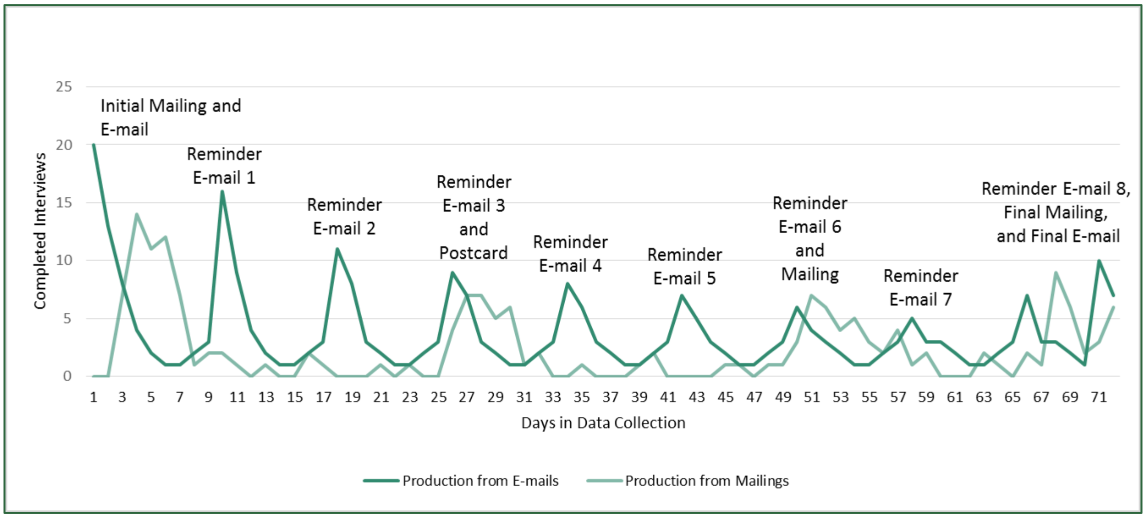
[1] Note that the darker green spikes reflect that emails are a more immediate and direct method to access the interview. Emails are delivered immediately, can be accessed on mobile devices, and can be accessed via a direct link eliminating the need to type

Example Production of RGEES Data Collection (Using E-mails and Mailings)



Respondent Encouragements

Showing graduates how important they are to this process through a monetary encouragement can save time and costs and may increase survey participation. Additionally, this type of motivation can encourage early participation, allowing more time and resources to be focused on nonresponding graduates. Prepaid cash (for example, $5) can be particularly effective if institutions have confidence in the accuracy of their mailing address information. Resources permitting, additional cash or gift cards may be helpful if graduates remain reluctant to take part in the survey. Gift cards can be purchased, for example, through Amazon.com, giftly.com, or tangocard.com. Paypal.com can also be used. Additionally, encouragement can be offered for keeping your institution informed of any and all changes to graduates' contact information.

When deciding whether or not to use a respondent encouragement, and which one to use, make sure that your institution has the budget for it and the procedures in place to handle administration and accounting.

Data Collection Mailings

Use regular mailings and e-mails to prompt graduates to complete web and mail surveys. Regular contacts maximize graduates' connection to the study. Consider the following methods.

IDs/strong passwords. Sample members that have access to both will generally use the credentials provided in emails to access the interview.

Prenotification Postcard

A prenotification mailing can be used to inform graduates of their inclusion in the study. This mailing can be a folded postcard or a letter that provides only a brief introduction and alerts the sample member to an upcoming mailing. The upcoming mailing would include more information, the survey request, and, if applicable, a prepaid encouragement. The prenotification postcard can be sent long before data collection begins (see **Appendix D** for a customizable postcard template).

Lead Letter Packet

Send a lead letter packet to every available address for the graduates. A packet could include, for example, a personalized letter signed by a well-known leader from your institution in a 9” x 12” U.S. Postal Service (USPS) first-class envelope. The packet should also include the following elements, examples of which are provided in the appendices at the end of this document.

- A letter (see **Appendix E**) addressed to the graduate that includes the following, as applicable
  - The option to complete the survey on the Internet, by mail, or over the telephone;
  - The web address for the survey website;
  - The sample member’s log-in credentials for accessing the web survey; and
  - E-mail and telephone contacts for questions or help in completing the survey;
- An RGEES FAQ flyer (see **Appendix G**);
- (If administering survey by mail) Survey (with a business reply envelope to return the mailing) (see **Appendix B**).

Other Mailings

Send periodic reminder mailings to prompt graduates to complete the survey (see **Appendix F**). Vary the style and packaging to catch the graduates’ attention, and consider using large-size envelopes, colorful postcards and flyers, USPS Priority mailers, and UPS envelopes. All mailings should request USPS mail-forwarding service and address correction so that institutions can update their contact information for any forwarded mail.

Data Collection E-mails

Send e-mail reminders on a regular basis, beginning with a data collection announcement e-mail and continuing throughout data collection. The data collection announcement e-mail should mirror the content of the data collection announcement letter and should also include the log-in credentials needed to complete the survey and a hyperlink to route graduates directly to the web survey. E-mails should look and feel like personal contact. Make it about the graduate, not about the institution. Increasingly, e-mails are being read on mobile devices; therefore, e-mail text should be short and to the point. Make sure the subject line and pre-header (the text following the subject line when an e-mail is previewed) complement each other. Prioritize what is important and be concise. Assume readers will take 3 seconds or less to decide if it's worth their time. Plain text e-mails are often more effective than e-mails that are burdened by graphics. Templates for initial and follow-up e-mails can be found in **Appendices E and F**. Also, consider including the FAQ flyer text (**Appendix G**) or a link to the FAQ flyer in an introductory email to answer common respondent questions.

When sending any data collection e-mails, remember to send them to all available e-mail addresses, and pay attention to automatic replies for additional contact information. Address e-mail bounce backs, spam, and whitelisting in any technical documentation you develop.

Phone Reminders

Mobile phones are the primary form of telephone used by most adults, especially younger adults (those under 29). Many young adult households do not even have a landline, so contact by mobile phone is the preferable form of telephone communication.

Be sure to keep graduates' schedules in mind when contacting them by phone. Interrupting meal times (especially dinnertime) or calling too early or too late in the day can create unfavorable emotions toward your survey, which can lead to lower response rates.

MOBILE-FRIENDLY STRATEGIES

According to research released in 2014 by the Pew Research Center, 90% of all adults, and 98% of young adults between the ages of 18 and 29, own a cell phone. In April 2015, the Pew Research Center conducted a follow-up study that found that 64% of all adults, and 85% of young adults, were "smartphone" users. Because of this, you should consider making updates about your institution's survey accessible via mobile devices. Being aware of how many of your graduates have access to mobile devices can help you target your outreach to graduates, thus ensuring cost- and time-effective data collection.

Contact Strategies

Differentiate between the "hard to locate" and the "hard to persuade" cases. If you are having difficulty reaching graduates (hard to locate), vary and combine the methods of communication outlined above. If calling graduates, spread out the calls among days or try varying the time of day when you call. Plan an adequate number of contact attempts with timing intended to maximize participation (e.g., more contact attempts spaced across days and times of the day offer greater potential for reaching respondents). If you are having trouble gaining participation (hard to persuade), be sure to emphasize how short the survey is—a small time commitment is attractive to graduates—and the fact that the survey comes at no cost to them. Assure the graduate that his or her privacy will be protected, and the data will only be reported to the Department of Education as group averages.

Train staff who may have contact with respondents in techniques to build cooperation and rapport. Rapport-building techniques include respect for respondents' rights, follow-up skills, knowledge of the goals and objectives of the data collection, and knowledge of the uses of the collected data. The goals of the survey, method of data collection, and time commitment should be clearly stated by interviewers interacting with graduates. If you are conducting interviews over the telephone or in person, interviewers should also receive this training.

Use your institution's logo(s), color scheme, and name in conjunction with the RGEES to increase response rates. In addition to explaining the importance of the survey to your program, make it clear to program graduates that the RGEES is officially sanctioned by your institution.

BEST PRACTICES IN CONTACTING GRADUATES

*Practices related to **Standard 1**, including parts 1, 3, and 4 and **Standard 2** including Standards 2.1]*

- Send information about the survey before it is administered.
- Clearly state the goals of the survey.
- Respect graduates' time and preferences.
- Tell graduates how long they should expect the survey to take, that it will be free to them, and that their responses will be kept confidential.
- Consider offering respondent encouragements.
- Vary methods of communication.
- Use institutional branding.

DATA COLLECTION

Ways to Administer the Survey

Standard 2: Data Collection Methodology sets out the balance between data quality and minimizing respondent burden. Institutions are advised to conduct surveys either via the **Internet** or via **mail**. Most institutions will choose one of the following primary modes:

- Mail a survey to be filled out and returned;
- Use the RGEES Platform (an Internet-based tool provided by the Department of Education, described below);
- If necessary, add the RGEES to the beginning of your institution's preexisting alumni survey;
- Choose multiple approaches.

Each of these survey modes has distinct advantages and disadvantages, and institutions should choose the mode that best fits their needs. The pros and cons of each mode are discussed below, but they are by no means exhaustive and do not necessarily apply to all institutions. Strongly consider using multiple approaches. Using more than one mode will yield higher response rates, but be thoughtful as to the timing of these efforts.

In some cases, institutions may also wish to use phone or in-person interviews. These ways to survey graduates are detailed later as options under **Nonresponse Follow-up**.

Mailed Surveys

Mailed surveys that can be filled out by graduates and returned to the institution are one possible way to administer the RGEES. Institutions that mail surveys should consider the following strategies:

- Distinguish your survey from regular mail (for example, using priority mail from the USPS, courier delivery service, irregularly shaped envelopes, and/or institutional logos);
- Explain the purpose of the survey (see **Appendix E** for an example letter).
- Follow the first mailing with a second mailing or phone call;
- Send reminder/thank you cards and a replacement survey as part of follow-ups;
- If using a 1-800 number, train staff to take survey information over the phone.

Benefits of mailed surveys for survey recipients:

- Accessible for recipients without access to technology;
- Allows the survey recipient to access earnings records, if needed, to answer the survey;

Challenges to consider with mailed surveys:

- Poses additional cost and logistical challenges (for example, priority mailings or use of courier services, need for postage-paid return envelopes);
- Requires data entry of returned surveys into a digital form (for example, Microsoft Excel);
- Requires that materials for the independent audit be created by institutions or that results be uploaded to the RGEES Platform;
- Requires institutions to maintain secured, physical copies of results for the duration of the appeal process;
- Often suffers from low response rates—using a variety of contact methods is encouraged for mailed surveys (that is, follow-up with phone calls, e-mails, second mailings, etc.) as discussed in other parts of this Best Practices Guide;
- May require longer data collection process because responses may be returned more slowly than those from a web survey;
- Poses an additional cognitive burden on the survey recipient to follow skip patterns and make sure that the survey is complete.

The RGEES Platform

The RGEES Platform is a tool under development by the Department of Education. This text reflects the current state of this tool and is subject to change.

The RGEES Platform is a web-based tool that contains the survey, has the ability to send e-mails, can be used to monitor response rates during data collection, can perform the requisite statistical analyses, and can produce many components of the survey appeal. This tool will be available for institutions to download from the Department of Education's website by December 2015. The RGEES Platform will create the materials needed for your institution to contact program graduates and conduct the RGEES. Even if your institution does not use the RGEES Platform to conduct the survey, you can still use the Platform to perform statistical analysis and other requisite reporting. Keep in mind that the RGEES Platform will not submit your survey results to the Department of Education.

Consider the items below when deciding if your institution wants to use the RGEES Platform. If your institution considers using a self-construction tool such as SurveyMonkey or SurveyGizmo to collect data, you will need to ensure that the data security for whatever tool you use meets the requirements of the RGEES as expressed in **Data Security Section** of this document. Note: Effective use of the RGEES Platform requires that institutions have accurate, up-to-date graduate e-mail addresses, a website, and the staff and information technology (IT) support to add the RGEES Platform to their website—or the services of a third-party vendor to support the installation and/or hosting of the RGEES Platform.

Benefits of using the RGEES Platform for institutions:

- Minimizes additional cost and effort by using a free off-the-shelf survey platform;
- Allows the survey administrator to easily monitor the response rate during data collection;
- Requires minimal effort to resend the survey to nonrespondents;
- Automatically makes required statistical calculations for earnings data and response rate;
- Automatically conducts preprogrammed nonresponse bias analysis to compare responding graduates to all graduates in the relevant cohort;
- Automatically produces materials for the independent audit of your survey process and results, as required by the Gainful Employment Regulations;
- Provides centralized management for institutions appealing graduate earnings for multiple programs;
- Minimizes response errors by automatically guiding the graduate through the survey process, restricting answers to certain questions, and editing invalid responses.

Benefits of using the RGEES Platform for survey recipients:

- Provides a convenient format with web-based administration;
- Allows the survey recipient to access earnings records, if needed, to answer the survey.

Challenges to consider with using the RGEES Platform:

- Requires institutions to have graduates' current e-mail addresses;
- Requires that institutions have the ability to host the RGEES Platform on their own website or to purchase hosting services from a third-party vendor;
- Requires graduates to have access to the Internet through a smartphone, tablet, or other computer.

Adding to an Institution's Preexisting Survey

If an institution chooses to add additional questions to the survey, per **Standard 1, part 2,** the following rules must be followed for the RGEES to be valid for an appeal:

- The RGEES questions must be the first questions in the survey.
- The wording of the RGEES questions cannot be changed.
- The order of the questions cannot be changed.
- Only RGEES questions can be used for the appeal.

Benefits of adding to a preexisting survey for institutions:

- Embeds the survey into a process that institutions are already using;
- Allows institutions to estimate response rates from prior surveys;
- Permits institutions to gather additional information useful for their own purposes.

Benefits of adding to a preexisting survey for survey recipients:

- Spares graduates from being surveyed multiple times.

Challenges to consider with adding to a preexisting survey:

- Requires a thoughtful approach to developing the combined survey, due to the rules above;
- Could result in a lower response rate because of a longer, possibly more complex, survey.

Nonresponse Follow-up: Phone and In-Person Survey Strategies

If your attempts to survey graduates via mail, the Internet, or incorporating the RGEES into another survey fail to generate the required 50% minimum response rate, you may decide to follow-up with nonresponding graduates to increase your response rate and/or to reduce the relative bias in your data. You may wish to conduct these follow ups with nonresponding graduates via the phone or in-person interviews.[2] These methods will be more successful if institutions do the following:

- Train interviewers to conduct interviews in a consistent manner to minimize differences between different interviewers administering the survey to respondents;
- Attempt to contact survey recipients at an optimal time;
- Prepare a script that quickly introduces the survey and gains cooperation.

Benefits of phone and in-person surveys for institutions:

- Permits trained interviewers to answer any questions that arise during the interview (in-person interviews are generally considered the gold standard for interviews);
- May inspire greater participation because, if the recipient is reached, phone and in-person interviewers are more difficult to ignore than mailed or web-based surveys.

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[2] In rare cases, institutions may consider using phone or in-person interviews as the main survey mode; however, these modes can be expensive and may be viewed as intrusive.

Benefits of phone and in-person surveys for survey recipients:

- Allows participants to ask clarifying questions and receive immediate, dynamic feedback;
- Convenient for participants—they do not need to travel to a location or have Internet access to complete the interview.

Challenges to consider with phone and in-person surveys:

- Each interviewer must be trained in how to administer the RGEES;
- In-person interviewers must physically locate the participant and travel to their location, which may be costly. In-person interviewers may also face safety concerns;
- Phone interviews may cause survey respondents to incur cost depending on their phone plans;
- Timing is critical. Because the interviews are one on one, the survey recipient cannot complete the interview at his or her leisure;
- The survey recipient may be less likely to access records, if needed, to answer the survey;
- Steps that avoid interviewer falsification must be documented, such as periodic monitoring by the survey administrator;
- Background checks on field staff who conduct in-person surveys are needed.

The following table presents issues and resources to consider when deciding which mode or modes to use for data collection.

Survey Data Collection Modes

What You Need	Web/RGEES Platform	Mail	Telephone	In-Person
Needed for Contact	Graduates' e-mail addresses	Graduates' mailing addresses	Graduates' telephone numbers	Graduates' physical addresses
Items Needed	Dedicated Computer Large IT storage capacity	Stamps, envelopes, paper Capability to reproduce contact materials and survey Self-addressed stamped return envelopes	Dedicated phone line(s) Call scheduler—paper or electronic	Portable web or paper questionnaire Capability to reproduce locating, contacting and interviewing materials Data entry capabilities Interviewer supplies
Personnel Needed	IT staff	Mailout staff Data receipt staff Data entry staff	Telephone interviewers Data entry staff	Field interviewers Data entry staff
Costs	IT storage Computer equipment	Postage Paper/envelopes Copying charges for contact materials and surveys Labor for data receipt, editing, and entry	Phone charges Interviewer labor hours Labor hours for data editing and data entry	Interviewer supplies Labor hours for interviewers—locating, contacting, and interviewing Labor hours for data entry and editing

Monitoring Data Collection Activities

Throughout data collection, survey administrators and individuals responsible for submitting the appeal should monitor data collection progress. For example, administrators should closely monitor the response rate to their survey. Doing so will help inform decisions about when to recontact graduates and send out additional mailings. This will also help institutions identify and resolve any problems with their survey administration process and ensure that the data collection is completed successfully. Please remember that appeals with a response rate under 50% will not be accepted.

Additionally, it is important that survey administrators adhere to data collection recordkeeping required for the audit process.

If the RGEES Platform is used for survey administration, it will collect all necessary data collection records, although the survey administrator will still need to monitor the response rate (which can be checked at any time in the RGEES Platform).

Note that programs using a mail survey should also track dates of initial mailings, any follow-ups, and returned surveys. Programs using multiple varieties of data collection will need to track which individuals have received which type of survey and centralize outcome information from across the different modes (e.g., ensure that when a survey is completed in the RGEES Platform that the graduate is not sent subsequent contact materials in different modes).

Data Editing

To remove survey responses that have a very low probability of being accurate, survey responses need to be edited if they are out of range. **Standard 4: Data Editing** outlines these edits, which are also specified here:

- Negative values for any of the earnings questions (3a, 3b, 4a, and 5a) will be replaced with zeroes.
- When total earnings is calculated (sum of 3a, 3b, 4a, and 5a), values over $999,999 will be replaced with $999,999.

A record of all edits, including both original values and an identifier for the case number, must be kept.[3] These materials must be supplied as part of the independent audit.

Maintaining Confidentiality

The Family Educational Rights and Privacy Act (FERPA) and any relevant state confidentiality or privacy laws apply to information gathered in the RGEES. You must create procedures and mechanisms to safeguard the information gathered through the RGEES. Because of the nature of this survey, it is best to consider all pieces of information as private and confidential. Particular attention should be paid to meeting the confidentiality requirements of FERPA if the survey is administered using modes other than mail or the RGEES Platform.

At some point, the data may contain Social Security numbers.
Take extra care to not mail out or otherwise disclose graduate Social Security numbers.

Pay special attention to **Standard 3: Maintaining Confidentiality**, which states:

> Federal law requires that the confidentiality of data that contain information about individuals (i.e., personally identifiable information or PII) must be protected (20 U.S.C. 1232g). Anyone who will have access to the information must understand the importance of protecting the confidentiality of the survey respondents' information, be cognizant of the requirements of the law, and monitor the confidentiality of PII in their daily activities and in the release of information to the public. Steps must be

[3] The RGEES Platform will automatically make these data edits and keep records of the changes.

taken throughout the data collection, processing, and reporting activities to ensure that data are handled in such a way as to avoid disclosure of PII.

LEGAL REQUIREMENTS: The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. 1232g) and any relevant state confidentiality or privacy laws apply to personally identifiable information used or collected in the survey. Data that include personally identifiable information from students' education records are protected under FERPA and may only be used for the evaluation of federally supported education programs or for conducting studies for or on behalf of educational agencies or institutions to improve instruction.

To adhere to the Maintaining Confidentiality standards, described above, it may be helpful to limit access to these data files to named, authorized users. Authorization should be granted on a need-to-know basis, minimizing the number of people with access to the personally identifiable information. Remember that access can be read-only or both read and write access. It may also be helpful to have the project manager responsible for that data periodically review data set access rights in order to guard against unauthorized release or alteration.

Additionally, data systems and electronic products should be protected from unauthorized intervention. Data files, network segments, servers, and desktop PCs should be electronically secured from malicious software and intrusion using the best available security software and practices. The practices should also be periodically monitored and updated.

Also remember that, according to **Standard 3.3,** the reporting rule in the Gainful Employment Regulations requires 30 cases to report data for a program (Section 668.402). If an institution reports any of the data collected in the RGEES in cross-tabulation form (e.g., showing earnings broken out by characteristics of the graduates), any table cell with one or two cases must be recategorized to ensure that each cell in the table has at least three cases. This rule applies to counts and to the numerator of any computed rates or percentages, and to the number of cases used to compute an average.

Data Security

All programs are required to develop a Data Security Plan (DSP) that describes the procedures to be used to preserve the confidentiality of the data. It is important that the plan cover all aspects of the project, including collection, processing, analysis, and storage of the data in any format (paper survey forms, electronic files, printouts). For a list of questions that should be covered in the Data Security Plan, see **Appendix H**.

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. 1232g) requires that personally identifiable information (PII) be protected.

Data security best practices begin with project staff. All staff who have any access to data must

- understand the importance of protecting the confidentiality of individuals
- be aware of and follow applicable state and federal laws (e.g. FERPA)
- monitor the confidentiality of PII in their daily activities and in the release of information to the public

The DSP should support the confidentiality pledge made to respondents that their information will be protected from unauthorized disclosure and will only be used in aggregate form.

Data Collection via the open Internet should be encrypted using a Secure Socket Layer (SSL) certificate from a certificate authority. This is the industry standard for securing information during electronic transmissions.

Access to any project files should be limited to authorized project staff.

Access to project PII should be strictly limited to staff whose jobs require access. Wherever possible, staff should be granted the least amount of access that still allows them to do the job at hand (e.g., READ only vs. WRITE access)

Access to project files, especially PII, should be reviewed periodically by project management to guard against unauthorized access.

Electronic resources such as servers and desktop computers must be secured against malicious software and intrusion using the best available information security practices.

Data security consists of a series of actions that are taken throughout the life of the project. The Data Security Plan should be routinely reviewed and updated.

BEST PRACTICES IN MAINTAINING CONFIDENTIALITY

*Practices related to **Standard** 3*

- Create unique IDs for your survey members that are not and do not include Social Security numbers. **Do not disclose Social Security numbers.**
- Grant authorization on a need-to-know basis only, minimizing access to sensitive information.
- Specify which users have read-only or both read and write access.
- The survey administrator should periodically review data set access rights in order to guard against unauthorized release or alteration.
- Protect data systems and electronic products from security breaches.

- Maintain an up-to-date information security framework. This is necessary to prevent malicious intrusion and theft of sensitive information.
- Periodically update your information security practices.

STATISTICAL CONCEPTS

The appeals process requires that the RGEES achieve specific statistical thresholds. Of the survey methods discussed above, only the RGEES Platform is designed to automatically make these calculations for you, thus easing the burden of these technical steps. For institutions not using the RGEES Platform, a spreadsheet template to make these calculations can be found here http://ifap.ed.gov/GainfulEmploymentInfo/attachments/NRBAtemplate.xlsx. Before you begin your statistical analyses, consult **Standard 5: Calculation of Response Rates, Standard 6: Nonresponse Bias Analysis**, and **Standard 7: Calculating the Mean and Median** in the *Standards for Conducting the Recent Graduates Employment and Earnings Survey*.

If you anticipate that the concepts in this section will pose challenges for your institution, then it is strongly recommended that you consider using the RGEES Platform, which is designed to handle these requirements for you.

Calculation of Response Rate

Accurate and unbiased data involve achieving a satisfactory response rate. Further, **the appeal will not be accepted if the response rate is below .50 (50%).** Your response rate is calculated using the following two pieces of information:

1. **The number of completed surveys**
   A completed RGEES must include sufficient responses to calculate graduates' earnings, including zero earnings. See **Appendix B** for the survey questions.
2. **The number of graduates in your cohort**
   This is defined by the number of graduates agreed upon between your institution and the Department of Education.

The rate is then #1 divided by #2, or:

$$Response\ Rate = \frac{Number\ of\ completed\ surveys}{Number\ of\ graduates\ in\ cohort}$$

If excluded cohort members that are not part of the agreed upon cohort list that the U.S. Department of Education submitted to the Social Security Administration are added as agreed to by ED, the count of those added cohort members should be added to the number of graduates in the cohort and the number of completed surveys.

Remember that the number for the "Response Rate" must be greater than or equal to .50 (50%), or you will not be able to submit an appeal. Additionally, once a graduate is on the cohort list of eligible graduates, they must continue to be counted in the "Number of graduates in cohort" even if they were not interviewed because they refused, were never contacted, provided incomplete responses, had language difficulties, or any other reasons for nonresponse.

For institutions not using the RGEES platform, a template that calculates the response rate for you can be found here http://ifap.ed.gov/GainfulEmploymentInfo/attachments/NRBAtemplate.xlsx.

Following is an example of the spreadsheet provided at the above link. In the spreadsheet, institutions will have to enter the **Number of survey respondents** and the **Number of graduates in the cohort.** The other cell in the spreadsheet contains a formula and is automatically calculated.

Number of survey respondents	Number of graduates in the cohort	Response rate
235	300	78.33%

Calculation of Mean and Median

According to the Gainful Employment Regulations, institutions can report either mean or median earnings, whichever is higher. These calculations can be readily made in most spreadsheet software programs and will be calculated automatically within the RGEES Platform. These provide two measures of the “average” wage and are illustrated below. Nonrespondents have no wage values and should be excluded from these calculations. However, reported total earnings of zero ($0) must be included in the calculations.

The *mean* is akin to the average and is simply the sum of all wages (i.e., all wages added together) divided by the number of cases that responded, or:

$$Mean = \frac{Sum\ of\ all\ respondents' wages}{Number\ of\ responding\ cases}$$

In contrast, the *median* is the midpoint, with half of the wages falling above the median and the other half below. The median may be useful for institutions appealing programs with many graduates earning low wages. Compute the median following these steps:

1. Order the wages from lowest ($0) to highest ($999,999).
2. Locate the middlemost wage—that is the median.
    - If there is an even number of wages, and thus no wage exactly in the middle, take the mean of the two wages closest to the middle.

If your institution is not using the RGEES platform, you can find a template that calculates the mean and median for you here http://ifap.ed.gov/GainfulEmploymentInfo/attachments/NRBAtemplate.xlsx.

Following is an example of the spreadsheet provided at the above link. In the spreadsheet, institutions will have to enter the **Name (or a unique ID)** and **Total Earnings for** each survey respondent, including those who reported zero ($0) total earnings**.** The other cells in the spreadsheet contain formulas that are automatically calculated.

MEAN	**$30,300**
MEDIAN	**$35,000**
Name (or unique ID):	**Total Earnings:**
Fred	$20,000
Nancy	$50,000
Sally	$0
Peter	$18,000
Bob	$45,000
Mike	$40,000
Jennifer	$60,000
Eric	$32,000
Karen	$0
Beth	$38,000

Nonresponse Bias Analysis

Nonresponse bias measures whether graduates who respond to the survey are likely to have different earnings than graduates who do not respond to the survey. For example, if graduates with low income are less likely to answer this survey, then the average income calculated from survey responses will seem higher than it truly is. Thus, to ensure that the results are meaningful, your appeal requires a nonresponse bias analysis if your response rate is greater than or equal to .50 (50%) and less than or equal to .80 (80%). There are two components of the nonresponse bias analysis:

1. The nonresponse rate
2. Known differences between respondents and nonrespondents

In practice, this is the same as **the difference between those graduates who responded to the survey and the entire surveyed graduate cohort.** Bias can be driven by both low response rates and differences between respondents and nonrespondents.

The basic measure of nonresponse bias used to support data submitted as part of an earnings appeal under the Gainful Employment Regulations is the relative bias which is the ratio of the bias to the percentage of students in the cohort with a particular characteristic. The nonresponse bias analysis will be calculated automatically by the RGEES platform both with and without any excluded cases.[4] If the RGEES platform is

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[4] According to 34 CFR 668.406(b)(3)(i), institutions can include in the cohort any students excluded by ED in the cohort sent to SSA.

not used, the measures that follow must be used in all nonresponse bias analysis conducted to support data submitted as part of an earnings appeal under the Gainful Employment Regulations. Make sure any graduates who were excluded in the cohort that the Department of Education sent to the Social Security Administration, but who are being included in this appeal, are included in the nonresponse bias analysis, just as they are included in the response rate.

An estimate of the bias due to nonresponse for each of the three attributes examined can be computed as the product of the nonresponse rate and the difference between respondents and nonrespondents. An estimate of the bias for each of the three attributes examined is given by:

$$B(\bar{Y}_{NR}) = \bar{Y}_R - \bar{Y}_T = (N_{NR}/N)\,(\bar{Y}_R - \bar{Y}_{NR})$$

Where:

$\bar{Y}_T$ = the percent based on all cases;

$\bar{Y}_R$ = the percent based only on respondent cases;

$\bar{Y}_{NR}$ = the percent based only on the nonrespondent cases;

N = the total number of cases; and

N_{NR} = the number of nonrespondent cases.

An estimate of the relative bias is then computed as the ratio of the bias due to nonresponse to the actual value derived from student records.

$$\mathrm{Rel}B(\bar{Y}_{NR}) = B(\bar{Y}_{NR}) / \bar{Y}_T$$

The average relative bias due to nonresponse is the sum of the attribute-specific relative biases (RelB(y_{nr})) divided by the number of attributes considered. Below is an example when three attributes are considered (corresponding to the three attributes required in the appeal process).

$$\text{Average } \mathrm{Rel}B(\bar{Y}_{NR}) = (|(B(\bar{Y}_{1NR})/\bar{Y}_{1T})| + |(B(\bar{Y}_{2NR})/\bar{Y}_{2T})| + |(B(\bar{Y}_{3NR})/\bar{y}_{3T})|)/3$$

Before conducting a nonresponse bias analysis, you should review the *Standards for Conducting the Recent Graduates Employment and Earnings Survey*. Additionally, please note that the RGEES Platform will make these calculations for you. Institutions not using the RGEES Platform to administer the survey will need to upload their graduates' survey results to the RGEES Platform or use the spreadsheet provided here http://ifap.ed.gov/GainfulEmploymentInfo/attachments/NRBAtemplate.xlsx.

Following is an example of the spreadsheet provided at the above link. In the spreadsheet, institutions will have to enter the **Number of respondents** and the **Number of graduates in the cohort.** The other cells in the spreadsheet contain formulas that are automatically calculated. The graduate characteristics listed in the spreadsheet must be used in the nonresponse bias analysis.

Graduate characteristic	Number of respondents	Percentage of respondents	Number of nonrespondents	Percentage of nonrespondents	Estimated bias	Relative bias	Absolute value of relative bias
Total	235		65				
Graduates with Pell Grants	150	63.83	18	27.69	7.83	13.98	13.98
Graduates with a zero expected family contribution	40	17.02	10	15.38	0.35	2.13	2.13
Females	102	43.40	48	73.85	-6.60	-13.19	13.19
AVERAGE							**9.77**

Once the spreadsheet is completed, the level of bias calculated in the spreadsheet will be compared to the allowable level to determine whether too much bias exists. The maximum allowable level of the absolute value of the relative bias is an average of 10% across the three variables.

REPORTING RESULTS FOR APPEAL

Complete documentation must be kept during the process of completing the RGEES, according to Gainful Employment Regulations. The purpose of this documentation is to provide the necessary materials for the independent audit. Two types of documentation are required, one for the survey and the other for the system.

Survey Documentation for Independent Auditor

1. Final data set(s), final instrument(s) or a facsimile thereof;
2. Definitions of all variables, including coding;
3. Data file layout;
4. Descriptions of constructed variables on the data file that are computed from responses to other variables on the file;
5. List of variables that could be used (alone or in combination) to uniquely identify an individual graduate in the data file;
6. List of all edits applied to data;
7. Frequency counts of all survey items, including counts of the number missing.

If the data will be used for any purposes other than the appeal under the Gainful Employment Regulations, the documentation must also include the elements that follow:

1. General description of disclosure avoidance techniques and,
2. Descriptions of restrictions on the use of data (e.g., limited to statistical uses; when using restricted data files, all unweighted counts included in any release must be rounded).

System Documentation for Independent Auditor

1. All instructions to respondents and interviewers about how to properly respond to a survey item or about how to properly present a survey item (if data collection is done outside the platform);
2. Description of the data collection methodology (if data collection is done outside the platform);
3. Data editing plan specifications;
4. Data processing plan specifications and justifications for why they were implemented;
5. Response rate;
6. Nonresponse bias analysis, if applicable.

Documents Required for Appeal Submission

1. A certification signed by the institution's chief executive officer attesting that the survey was conducted in accordance with the *Standards for Conducting the Recent Graduates Employment and Earnings Survey* and that the mean or median earnings used to recalculate the debt-to-earnings ratios was accurately determined from the survey results;
2. An examination-level attestation engagement report prepared by an independent public accountant or independent governmental auditor, as appropriate, that the survey was conducted in accordance with the requirements set forth in the *Standards for Conducting the Recent Graduates Employment and Earnings Survey*. The attestation must be conducted in accordance with the attestation standards contained in the Government Accountability Office's Government Auditing Standards promulgated by the Comptroller General of the United States (available at *www.gao.gov/yellowbook/overview* or its successor site), and with procedures for attestations contained in guides developed by and available from the Department of Education's Office of Inspector General (See http://www2.ed.gov/about/offices/list/oig/nonfed/sfgd2000.pdf and http://www2.ed.gov/about/offices/list/oig/nonfed/sfa.html);
3. Supporting documentation requested by the Secretary.

Once the independent auditor has conducted his or her review, three sets of appeal documents must be submitted to the Secretary of Education as part of the appeal.

Appendix A: The Standards for Conducting the Recent Graduates Employment and Earnings Survey

Following is the Standards for Conducting the RGEES. All of the Standards must be followed in order for an institution's appeal to be considered. An independent auditor is needed to verify that an institution followed all of the Standards for Conducting the RGEES.

STANDARDS FOR CONDUCTING THE RECENT GRADUATES EMPLOYMENT AND EARNINGS SURVEY

INTRODUCTION

The Recent Graduates Employment and Earnings Survey (RGEES) can be used in an earnings appeal under the Gainful Employment Regulations as an alternative to the Social Security Administration (SSA) earnings data. The alternative earnings survey may be administered to graduates in a specified cohort of students who completed the program and who received Title IV assistance to attend a gainful employment program.

The Recent Graduates Employment and Earnings Survey must be administered to the finalized list of graduates that the U.S. Department of Education (ED) uses to calculate the debt-to-earnings ratios under the Gainful Employment Regulations, as determined under 34 CFR 668.405(c)(4). However, the survey may also be administered to graduates who were excluded by ED due to activities that were assumed to depress their incomes (e.g., enrolled student, military service) (CFR 668.406(b)(3)(i)).

This kind of study, in which every individual on the list is asked to participate, is called a universe survey. For comparability, the Recent Graduates Employment and Earnings Survey at a minimum must be administered to every one of the graduates (i.e., the universe) identified on the finalized list of Title IV-assisted program completers that was used by the Department of Education for matching with the SSA records.

To facilitate data collection for this appeals process, the U.S. Department of Education will make a data collection and processing platform available with the RGEES survey. The RGEES Platform, when loaded onto an institution’s server, can be used for Internet-based administration of the RGEES. The RGEES Platform will assist the survey administrator in monitoring response rates during data collection. Once the data collection is completed, the RGEES platform will do the following:

- compile the data;
- apply data edits (e.g., top-coding edits on extremely high values, coding negative values to zero);
- provide a count of the number of edited records;
- compute total earnings for each respondent;

- compute the response rate;
- compute the mean and median earnings for the responding population; and
- compute the nonresponse bias analysis if the response rate is 50% or above.

NOTE: In the standards that follow the requirements that are starred are met with information produced using the RGEES Platform and those using the platform need only address the unstarred requirements. For those electing to not use the platform, the survey administrator must adhere to each of the requirements.

1. PLANNING YOUR DATA COLLECTION --

Standard 1:
The survey design components required to conduct the Recent Graduates Employment and Earnings Survey include a plan that addresses the objectives of the survey, the survey design, the data collection plan, the confidentiality pledge, a data security plan, and the human and fiscal resources and time needed to achieve high data quality. To meet this standard, the survey design plan must include the following:

1.1: *A detailed discussion of the goals and objectives of the survey or survey system, including the information needs that will be met, content areas included, the list of program completers to be surveyed, and analytic goals (see Standard 8)

1.2: *A listing of all survey data items. It is preferred that only RGEES items appear in the survey used to collect data for the Gainful Employment Regulations earnings appeal process.

If the survey provided by ED is administered in conjunction with another survey of program completers, the RGEES questions must be used intact. That is, no alteration of the wording of the survey questions is permitted, and the order of individual items must be preserved.
Any additional items must be separate and not applicable to the Gainful Employment issue. These additional items can be added only at the end of the survey to avoid affecting the responses to the questions provided in the Recent Graduates Employment and Earnings Survey.

Only data from the RGEES questions may be used in an appeal.

1.3: The anticipated data collection procedures must include the elements that follow.

1. Timing of data collection;
2. Primary mode of collection (e-mail, mail survey, telephone, or in-person interview) (See *RGEES Best Practices Guide*; for information based on OMB "Guidance on Agency Survey and Statistical Information Collections," 1/20/2006);
3. Data collection protocol to be used by data collection staff;
4. Training of survey collection staff and persons coding and editing the data;
5. Anticipated response rate for the data collection (see Standard 5.1); and
6. Methods used to achieve acceptable response rates (see Standard 2).

1.4: *A nondisclosure pledge (see Standard 3.1).

1.5: A security plan for preserving the confidentiality of the data during collection, processing, and analysis (see Standard 3.2 for details).

1.6: If data may be used now or in the future for any purpose beyond the appeal, provide a disclosure analysis plan that describes how disclosure risk will be controlled (see Standard 3.3 for details).

1.7: Outline the quality assurance plan for each phase of the survey process that will permit monitoring and assessing the performance during implementation.

1.8: Outline the general parameters for monitoring nonresponse and evaluating survey procedures and results (see Standards 5 and 6 for details).

1.9: Identify and monitor key milestones of the survey and the time relationships among them.

1.10: An estimate of the target time period needed for the full survey cycle, including the estimated times for the items that follow.

1. Planning and development;
2. Data collection;
3. *****Processing and data editing;
4. Disclosure avoidance plan and analysis, if data will be used for any purpose other than the aggregated data from the RGEES;
5. File construction;
6. Survey documentation; and

7. ***Completion and review of the reporting template and any additional internal reports.

2. DATA COLLECTION METHODOLOGY --

Standard 2:
Administer data collection instruments and methods in a manner that achieves the best balance between maximizing data quality and controlling measurement error while minimizing respondent burden using best practices established in the field of survey methodology.

2.1: Encourage respondents to participate to maximize response rates and improve data quality. (See the *RGEES Best Practices Guide* for data collection strategies that can be used to achieve high response rates).

2.2: Design and administer the data collection to achieve the best data quality possible. Doing so requires the steps that follow.

1. Identify the appropriate methods / modes (e.g., e-mail, mail, telephone, Internet) of data collection for recent program completers, the objectives of the data collection, the resources available, and time constraints;
2. When using the RGEES platform, or any other electronic data collection system, establish protocols for computer systems to ensure that Internet data collection functions correctly (see the RGEES Platform User Guide on how to install/use the platform);
3. Use more than one mode of data collection to improve response rates and / or if needed to meet response rate requirements (e.g., follow up nonrespondents in a mail or Internet survey with telephone calls). (See Standard 5.2 and the Data Collection section in the *RGEES Best Practices Guide* for additional guidance on response modes); and
4. Establish the data collection protocol to be followed by the staff involved in the data collection (see the *RGEES Best Practices Guide*).

2.3: Monitor data collection activities.

1. Use internal reporting systems that provide timely reporting of response rates and the reasons for nonresponse throughout the data collection (e.g., paradata, such as refusals, hard to locate cases). These systems should be flexible enough to identify important subgroups with low response rates for more intensive

follow-ups. The RGEES Platform has a participation rate reporting function that supports this monitoring.

2. Specify procedures to use to identify and correct problems. (See the *RGEES Best Practices Guide* for details.)

3. MAINTAINING CONFIDENTIALITY---

Standard 3:
Federal law requires that the confidentiality of data that contain information about individuals (i.e., personally identifiable information or PII) must be protected (20 U.S.C. 1232g). Anyone who will have access to the information must understand the importance of protecting the confidentiality of the survey respondents' information, be cognizant of the requirements of the law, and monitor the confidentiality of PII in their daily activities and in the release of information to the public. Steps must be taken throughout the data collection, processing, and reporting activities to ensure that data are handled in such a way as to avoid disclosure of PII.

LEGAL REQUIREMENTS:
The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. 1232g) and any relevant state confidentiality or privacy laws apply to personally identifiable information used or collected in the survey. Data that include personally identifiable information from students' education records are protected under FERPA and may only be used for the evaluation of federally supported education programs or for conducting studies for, or on behalf of, educational agencies or institutions to improve instruction.

3.1: *****The Recent Graduates Employment and Earnings Survey uses the graduation/completion status of program participants, student background information, and their contact information from the students' education records for graduates of a specific Gainful Employment program as part of the evaluation of Title IV-supported gainful employment education programs. This information is protected by FERPA. The respondents must be informed of these protections, and must be assured that their individual data, including their employment and earnings data, will be protected from unauthorized disclosure, will be combined with those of other respondents from their program, and will only be reported in the aggregate when there are a sufficient number of graduates to protect each respondent's data. Note that the reporting rule in the Gainful Employment Regulations requires 30 cases to report data for a program (Section 668.402).

3.2: Establish procedures and mechanisms to ensure the information is protected during the production, use, storage, transmittal, and disposition of the survey data in any format (paper survey forms, electronic files, printouts). Ensure that personally identifiable survey data are protected from physical and electronic intrusion (see RGEES Best Practices Guide for a template for your Security Plan).

3.3: The reporting rule in the Gainful Employment Regulations requires 30 cases to report data for a program (Section 668.402). If any additional cross-tabulations are released for external use (e.g., using characteristics of the graduates), any table with a cell with 1 or 2 cases must be recategorized to ensure that each cell in the table has at least 3 cases. This rule applies to counts and to the numerator of any computed rates or percentages, and to the number of cases used to compute an average.

4. DATA EDITING--

STANDARD 4: Data editing will be used to correct inconsistent data in the RGEES data.

4.1: *The edits that follow must be used. No additional edits may be used.

1. Negative values for any of the income questions will be replaced with zeroes (i.e., survey items 3a, 3b, 4a, and 5a).
2. When the total income (i.e., sum of survey item responses for 3a, 3b, 4a, and 5a) is calculated, values over $999,999 will be replaced with $999,999.

4.2:* Code the data set to flag each action taken during editing; also retain the unedited data along with the edited data.

5. CALCULATION OF RESPONSE RATES--

Standard 5: Surveys must be designed and conducted to achieve the highest practical rates of response to ensure that survey results are representative of the list of recent graduates who received Title IV assistance so that they can be used with confidence to reflect the employment status and earnings of the Title IV-assisted recent graduate cohort. Nonresponse bias analysis must be conducted when response rates or other factors suggest the potential for bias to occur.

5.1: ***** A completed survey must include sufficient responses to determine whether the respondent has earnings and to support reporting the respondent's total earnings (including 0 earnings). The RGEES survey will be considered "complete" if the respondent fills out at least one of the earnings items. The survey response rate is calculated as the ratio of the number of completed surveys (S) to the number of graduates in the cohort (C). Potential respondents that are eligible and not interviewed may include refusals, noncontacts, incomplete responses, or other reasons for nonresponse.

Response Rate = RR = S/C

1. If cohort members who were excluded from the agreed upon cohort list that the U.S. Department of Education submitted to the Social Security Administration to obtain the cohort earnings data are added, the count of those added cohort members should be added to the number of cases in the cohort (C) and also to the number of completed surveys (S) (see Introduction for a description of excluded cases).

5.2: **As a minimum requirement, at least one half of the recent graduates surveyed for a specific program must submit a completed survey through one or more modes of data collection. That is, the response rate for an individual program must be at least 50 percent for the data to be used to support an appeal under the Gainful Employment Regulations appeal process.**

6. NONRESPONSE BIAS ANALYSIS--

Standard 6: The potential impact of nonresponse on the quality of information obtained from the survey must be taken into consideration. Nonresponse bias is a serious problem and occurs when there is a correlation between the likelihood of participation in the survey and the responses to the survey variable(s) being measured. Survey estimates may be biased if those who choose to participate (respondents) differ substantially and systematically from those who choose not to participate (nonrespondents). If these differences are related to employment status or earnings, the results from the RGEES may be misleading or even erroneous. The nonresponse bias analysis can indicate the potential impact of nonresponse bias. A nonresponse bias analysis must be conducted if the unit response rate is between 50 percent and 80 percent.

Nonresponse bias is assessed by comparing respondents and nonrespondents on information available from graduates' student records. Analysis of recent program level data identified three variables that are readily available in student records and are correlated with earnings: graduates with Pell grants, graduates with a zero expected family contribution, and graduates who are female. A nonresponse bias analysis examines these attributes of the program graduates to determine whether response rates are related to those attributes and/or whether the characteristics of respondents and nonrespondents differ on these characteristics.

If excluded cohort members that are not part of the finalized cohort list that the U.S. Department of Education submitted to the Social Security Administration to obtain the cohort earnings data are added to the list of graduates, the student attribute data for those graduates should be included in the data set prior to conducting the nonresponse bias analysis. (If the RGEES platform is used, data for these graduates should be added to the RGEES data base. If the RGEES platform is not used, these counts should be included in the nonresponse bias analysis.)

1. **The first question in a nonresponse bias analysis is whether the response rates vary across the attributes examined (i.e., do the response rates computed for the group of respondents who received Pell grants differ from those who had a zero expected family contribution, or those who are female)?**
2. **The second question in a nonresponse bias analysis is whether there are differences between respondents and nonrespondents on the attributes examined—for example, does the percent of responding graduates who received Pell grants differ from the percent of nonresponding graduates who received Pell grants; are there differences between responding and nonresponding graduates in the percentages of graduates with zero expected family contributions; or the percentages who are female).**

6.1: *The basic measure of nonresponse bias is the relative bias, that is, the ratio of the bias in an attribute to the percentage of graduates in the cohort with the attribute(s) measured based on data from the graduates' student records. The relative bias must be computed for the percent of graduates who received Pell Grants while enrolled, the percent with zero expected family contributions, and the percent female and the average relative bias averaged over these three attributes.

If excluded cohort members that are not part of the agreed upon cohort list that the U.S. Department of Education submitted to the

Social Security Administration to obtain the cohort earnings data are added to the cohort, they must be added to the data collection data base before the final nonresponse bias analysis is conducted (see Introduction for a description of excluded cases).

*The nonresponse bias analysis must be conducted both with and without the excluded cases. The relative bias must be calculated as follows:

1. An estimate of the bias due to nonresponse for each of the three attributes examined can be computed as the product of the nonresponse rate and the difference between respondents and nonrespondents. An estimate of the bias for each of the three attributes examined is given by:

$$B(\bar{Y}_{NR}) = \bar{Y}_R - \bar{Y}_T = (N_{NR}/N)(\bar{Y}_R - \bar{Y}_{NR})$$

Where:

$\bar{Y}_T$ = the percent based on all cases;

$\bar{Y}_R$ = the percent based only on respondent cases;

$\bar{Y}_{NR}$ = the percent based only on the nonrespondent cases;

N = the total number of cases; and

N_{NR} = the number of nonrespondent cases.

2. An estimate of the relative bias is then computed as the ratio of the bias due to nonresponse to the actual value derived from student records.

$$\mathrm{Rel}B(\bar{Y}_{NR}) = B(\bar{Y}_{NR}) / \bar{Y}_T$$

3. The average relative bias due to nonresponse, computed as the average of the absolute value of the relative bias due to nonresponse measured for each of the three attributes examined, is used to measure the relative bias due to nonresponse present in of the RGEES data.

$$\text{Average }\mathrm{Rel}B(\bar{Y}_{NR}) = (|(B(\bar{Y}_{1NR})/\bar{Y}_{1T})| + |(B(\bar{Y}_{2NR})/\bar{Y}_{2T})| + |(B(\bar{Y}_{3NR})/\bar{y}_{3T})|)/3$$

6.2: *In the case of nonresponse to the RGEES, the following decision rule applies:

> As a minimum requirement, the average relative bias due to nonresponse (equation 6.1.3) in the data for recent graduates surveyed for a specific program must not exceed 10 percent. That is, the average relative bias computed over the percent of graduates who received a Pell grant, the percent with a zero expected family contribution, and the percent female within an individual program must not exceed 10 percent in order for the earnings data from RGEES to be used to support an appeal under the Gainful Employment Regulations appeal process.

7. CALCULATING THE MEAN AND MEDIAN ---

Standard 7: Established procedures must be used to compute the mean and median of the earnings data collected using RGEES.

7.1: *The mean is the average, computed as the sum of all earnings across graduates who responded to the survey divided by the number of graduates who responded to the survey. Nonrespondents must be excluded from the computation, but respondents who reported zero ($0) earnings must be included in the computation. (The mean will be calculated automatically by the RGEES platform. If the RGEES platform is not used, the mean must be computed as described here.)

7.2: ***The median is the midpoint of the distribution of all reported earnings, including zeros ($0). One half of the respondents with earnings reported (including zeros ($)) are above the median and one half are below the median. . (The median will be calculated automatically by the RGEES platform. If the RGEES platform is not used, the median must be computed as described here.)

1. Order the respondents' earnings from the lowest ($0) to the highest ($999,999). (If multiple graduates have equal amounts of total income, enter that amount once for each graduate with that amount of income.)
2. Identify the middlemost earnings value which is the median earnings value. If the number of respondents is even, there is no one middle value. In this instance, the median is computed as the mean of the two earnings values closest to the middle.

8. DOCUMENTING A SURVEY SYSTEM --

Standard 8: Complete documentation must be developed for each program that uses the RGEES in an appeal of the program's graduates' earnings under the Gainful Employment Regulations. Documentation includes those materials necessary to replicate and evaluate each survey.

8.1: *Survey documentation must, at a minimum, include the elements that follow.

1. Final data set(s), final instrument(s) or a facsimile thereof;
2. Definitions of all variables, including coding;
3. Data file layout;
4. Descriptions of constructed variables on the data file that are computed from responses to other variables on the file;
5. List of variables that could be used (alone or in combination) to uniquely identify an individual graduate in the data file;
6. List of all edits applied to the data;
7. Frequency counts of all survey items, including counts of the number missing.

8.2: If the data will be used for any purposes other than the appeal under the Gainful Employment Regulations, the documentation must also include the elements that follow.

1. General description of disclosure avoidance techniques and
2. Descriptions of restrictions on the use of data (e.g., limited to statistical uses; when using restricted data files, all unweighted counts included in any release must be rounded).

8.3: *System documentation must include the elements that follow. If using the RGEES Platform, and any alternative modes are used, 1 and 2 should be modified to include relevant information for modes other than the web collection.

1. All instructions to respondents and interviewers about how to properly respond to a survey item or about how to properly present a survey item;
2. Description of the data collection methodology;
3. Data editing plan specifications (see Standard 4 and the *RGEES Best Practices Guide*);
4. Data processing plan specifications and justifications for why they were implemented;
5. Response rates; and

6. Nonresponse bias analysis, if applicable.

Appendix B: The Survey

Following is the RGEES survey that you will be distributing to your program graduates in order to collect information about their earnings. The information gathered with this survey will then be used in the Department of Education's calculation of your program's Debt-to-Earnings Ratio. If your institution is using the Platform to conduct the survey, there is no need to send the text of this survey out to graduates; the text is included in the Platform.

DO NOT alter the wording of this survey. Any alterations to the wording of the survey will result in failing the regulation-required audit and thus failure of the RGEES appeal.

Recent Graduates Employment and Earnings Survey

The purpose of the Recent Graduates Employment and Earnings Survey is to collect information about the average earnings of graduates from programs whose students receive federal financial aid and which are subject to regulations on gainful employment.

The information you provide on this survey will be grouped with information from other graduates of your program. Average earnings for all graduates of the program will be calculated and reported to the U.S. Department of Education. Your individual earnings will ***never*** *be reported, disclosed, or used in any other manner.*

1. **Please verify that you are <First-Name Last-Name>. Is this correct?** If you have legally changed your name but once went by <First-Name Last-Name>, please answer Yes below.

   ☐ No→ *Continue with question* ***2****.*

   ☐ Yes→ *Skip to question* ***3****.*

2. **Have you ever gone by <First-Name Last-Name>?** If you have legally changed your name but once went by <First-Name Last-Name>, please answer Yes below.

   ☐ No→ *Thank you. Please return the survey so that we can remove you from our list and you are not contacted again.*

   ☐ Yes

The next few questions are about employment earnings **during the <earnings year> calendar year**.

This survey asks about wages and self-employment income separately. In some cases, it may not be clear to you where earnings you received should be reported. Please just use your best judgment about this, but please **do NOT report the same earnings more than once**. Remember to include earnings **from ALL jobs, even if they are not related to your degree or certificate.** Please do NOT include sources of income other than employment, such as alimony, child support, social security, disability, or unemployment compensation.

3. **Did you receive any wages, salary, tips, overtime pay, bonuses, or commissions from an employer in <earnings year>?**

   ☐ No→ *Skip to question* ***4***.

   ☐ Yes→ **3a.** Think about **the job you held the longest** during <earnings year>. **In total**, how much did you earn **from that employer,** before taxes and other deductions, in **<earnings year>**?

   $____________

   3b. Now think about **all OTHER jobs** you held during <earnings year>. **In total**, how much did you receive **from all other employers,** before taxes and other deductions, in **<earnings year>**? If you had no additional jobs, please enter a zero.

   $____________

4. **Excluding any income mentioned above, did you receive any self-employment income, including income from your own business, in <earnings year>?**

☐ No→ *Skip to question **5**.*

☐ Yes→ **4a.** What was the amount you received in net self-employment income in **<earnings year>?** Please report income minus expenses. If this amount is negative, please enter zero.

$______________

5. People sometimes earn extra money doing work outside of their regular jobs, such as freelancing, consulting, moonlighting, or doing other casual jobs. **In <earnings year>, did you earn any other money from work you did that you have not already reported on this survey?**

☐ No→ *Thank you. Please **return the survey**.*

☐ Yes→ **5a.** What was the amount of your additional earnings from work in **<earnings year>** that are not already reported above?

$______________

Thank you for your participation.

Please return the survey.

Appendix C: Sustained Contact E-mail/ Postcard

This appendix provides an example of an e-mail or postcard that can be sent by your institution to recent graduates in order to encourage a continuing relationship with your institution. Graduates who maintain contact with the institution they attended are easier to reach than graduates who do not. The RGEES has explicit response rate requirements, and it is in your institution's best interest to have a high rate of response from those graduates that you contact.

Dear **<<Graduate>>**,

We know that every graduate has a story that continues after their time at <<institution>>. Just as <<institution>> will always be a part of your story, we hope that you will remain a part of ours.

We want to make it easy for our graduates to stay in contact with us—and one of the simplest ways of keeping that relationship intact is by continuing to keep your <<contact information/student portal/institution info page>> updated. Did you move to a new city? Did you change your e-mail address? Tell us about it! Keep us in the loop when your contact information changes, and we promise we'll do the same for you.

Maintaining a strong, vibrant relationship with <<institution>> allows you to stay connected to the community and fellow alumni. It also keeps you up to date with happenings at <<institution>>, of which there are many!

In a matter of <<months/weeks/etc.>>, <<institution>> will be conducting a Recent Graduates Employment and Earnings Survey (RGEES). This survey will be used to determine <<institution's>> Debt-to-Earnings Ratio as mandated by the Department of Education's Gainful Employment Regulations. We value your input as a graduate of <<institution>>, and we want to make sure we are able to contact you when the time comes for us to send out the RGEES survey.

We thank you for your time and value you as an important part of the <<institution>> family.

Sincerely,

<<member of the institution>>

<<Institution>>
<<Mailing Address 1>>
<<Mailing Address 2>>
<<City>>, <<State>> << ZIP>>

Jane Smith
123 Maple Street
Apt A
Anytown, US 12345

Appendix D: First-Contact Postcard

Following is an example of a postcard that can be mailed to graduates of your program to invite them to participate in the RGEES. This postcard introduces them to the purpose and general organization of the survey and provides them with enough information to make an informed decision.

<<Name>>,

We [or <<institution>>] will be reaching out to you soon for your help on the **Recent Graduates Employment and Earnings Survey** (RGEES).

By participating in this 5-minute survey, you can help ensure that <<institution>> continues to qualify for important federal student aid and complies with the Department of Education's Gainful Employment Regulations.

IN ORDER TO SUCCEED, WE NEED YOUR INPUT!

The more graduates who complete the survey, the more comprehensive <<institution>'s> data will be!

Be on the lookout for more information from us, and please help make this survey a success by answering just three questions about your income since you graduated.

The information you provide will be used only for this survey. By participating, you can help us [or <<institution>>] find a truer measure of our graduates' earnings. Combined with information from other graduates, data based on average responses will also help the Department of Education make better decisions about education and training for adults in the United States!

For more information about the Recent Graduates Employment and Earnings Survey, contact
<<Name>> at <<telephone>> or <<e-mail>>

<<Institution>>
<<Mailing Address 1>>
<<Mailing Address 2>>
<<City>>, <<State>> << ZIP>>

Jane Smith
123 Maple Street
Apt A
Anytown, US 12345

COMING SOON!

Appendix E: E-mail/Letter

The following letter should be mailed to graduates who have been selected to participate in the RGEES. It lays out detailed information on the purpose of the survey and the responsibilities and burden associated with it. This letter provides an official explanation of the survey and encourages participation.

Dear <<Graduate>>,

As a graduate of <<program/institution>>, you have been selected to participate in the Recent Graduates Employment and Earnings Survey (RGEES).

By completing this simple, 5-minute survey about your earnings since graduation, you can help <<institution>> remain eligible for federal financial aid, allowing future students at <<institution>> the same help and assistance that was provided to you when you were a student. Since our institution grants certificates and degrees that prepare students like you for jobs, we are subject to the U.S. Department of Education's Gainful Employment Regulations. To determine continuing eligibility for federal financial aid, institutions like ours will be issued a "Debt-to-Earnings Rating" by the U.S. Department of Education based upon a calculation of our graduates' earnings compared to their debt. By participating in this survey, you will be helping <<institution>> find a truer measure of our <<program>> graduates' earnings than the rating we were previously issued.

The RGEES will ask you about your earnings in an effort to calculate the average earnings of students who graduated from <<institution/program>>. This information will be used only in the recalculation of <<institution/program>>'s Debt-to-Earnings Ratio and never for any other purpose. Information will only be sent to the Department of Education in aggregate form. Your individual survey responses will never be shared with anyone outside of <<institution's office conducting the survey>>. There will be no cost to you if you choose to participate in the RGEES. <<if offering respondent encouragement >> *As a token of our appreciation, we will send you* <<respondent encouragement >> *to thank you for your participation*.

<<Institution>> will provide you with a number of options for completing the survey. You will be able to complete the RGEES survey by <<will vary by institution>>: mail, telephone, and on the Internet. <<if this is a paper letter and a web survey is offered>> We have sent you an e-mail with the log-in credentials necessary for you to access the survey on our website. Please follow the directions in that e-mail in order to begin the RGEES. <<if this is an e-mail and a web survey is offered>> Please use the link and credentials included below to complete the RGEES. <<if this is a paper letter and a paper survey is offered>> Please complete the survey on the following page and return it in the prepaid envelope. We will be here to guide you through this process, and we have set up a help desk reachable at <<e-mail>> and <<phone number>> for any of your questions.

The more graduates who complete the survey, the more accurate <<institution's>> earnings data will be. Your involvement actively helps <<institution>> and your fellow students.

Sincerely,

<<member of the institution>>

Appendix F: Follow-up E-mail/Letter/Postcard

This appendix provides an example of a letter that can be used to encourage participation from a graduate who has up to that point been unresponsive. In order to avoid appearing like spam, it is suggested that your institution produce multiple variations on these follow-up e-mails/letters/postcards. For each intervention or recontact attempt, it is suggested you produce new or altered wording.

Dear **<<Graduate>>,**

You recently received an invitation to participate in the Recent Graduates Employment and Earnings Survey (RGEES) on behalf of <<institution>>. We still need your participation to make this survey a success. Participation is entirely voluntary but, by answering just three questions about your recent earnings, you can help us remain eligible for federal financial aid.

Your feedback is extremely important to the institution; it will allow us to offer the same kind of help you were offered to future students for years to come. <<if offering respondent encouragements>> Additionally, your participation in the RGEES includes a <<respondent encouragement type here>>, which will be given to you as compensation for your time and effort upon completion of the survey.

Your participation actively helps <<institution>>, <<program>>, and fellow students. You and your fellow <<program>> graduates aggregate responses can help the U.S. Department of Education use better information and make better decisions about education and training for adults in the United States. I hope you will consider participating in the RGEES.

Sincerely,

<<member of the institution>>

If you have any questions about the study, please contact us at <<phone number>> or by e-mail at <<e-mail>>.

<<Institution>>
<<Mailing Address 1>>
<<Mailing Address 2>>
<<City>>, <<State>> << ZIP>>

Jane Smith
123 Maple Street
Apt A
Anytown, US 12345

Appendix G: FAQ Flyer

The following flyer should be distributed to all graduates who are selected to participate in the RGEES. It provides valuable information about the survey.

Recent Graduates Employment and Earnings Survey

To qualify for federal financial aid, most for-profit programs and certificate programs at private nonprofit and public institutions must prepare students for gainful employment in a recognized occupation. To comply with the U.S. Department of Education's Gainful Employment Regulations—and remain eligible for federal student aid—a program's graduates must have annual loan payments that are less than 8 percent of their wages, or less than 20 percent of their discretionary income (discretionary income is the amount you earn above the poverty line).

Who is conducting the survey?

<<institution>> is conducting the Recent Graduates Employment and Earnings Survey, in compliance with the U.S. Department of Education's Gainful Employment Regulations.

What is this survey about?

To ensure their continued eligibility for important federal student aid, institutions like ours may wish to appeal the Debt-to-Earnings Ratio calculated by the Department of Education. These institutions can appeal by submitting results from the Recent Graduates Employment and Earnings Survey. The brief survey includes 3 questions about the types of earnings you have received since you graduated.

How long will it take to complete the survey?

The survey should take 5 minutes or less to complete.

Who is asked to participate?

<<institution>> is reaching out to recent <<program>> graduates to complete this survey. Participation is completely voluntary, but the more graduates who complete the survey, the more accurate your institution's data will be.

How will the survey be conducted?

The survey can be completed in a number of ways. We may ask you to complete the survey by mail, via the Web, or through a telephone interview.

How will the data be used?

Data will be used only to recalculate institution/programs' Debt-to-Earnings Ratios, as specified by the Gainful Employment Regulations.

Will my answers remain confidential?

Your individual survey answers will not be disclosed and will only be combined with the answers from your institution's other recent <<program>> graduates to recalculate your institution's Debt-to-Earnings Ratio.

FOR MORE INFORMATION ABOUT THE RECENT GRADUATES EMPLOYMENT AND EARNINGS SURVEY, CONTACT:

<<CONTACT>> AT <<TELEPHONE NUMBER>>

FOR MORE INFORMATION ABOUT THE GAINFUL EMPLOYMENT REGULATIONS, PLEASE VISIT

HTTPS://WWW.FEDERALREGISTER.GOV/ARTICLES/2014/10/31/2014-25594/PROGRAM-INTEGRITY-GAINFUL-EMPLOYMENT

Appendix H:
Data Security Template

The following questions should be used to assess whether or not basic data security criteria have been met.

DATA SECURITY TEMPLATE

- Did the program develop, implement, and adhere to a Data Security Plan (DSP)?
- Does the DSP include information on reporting a security breach?
- Were respondents informed that their data would be held as confidential and only used for statistical purposes?
- If data was collected over the internet through the RGEES platform, was an SSL certificate from a certificate authority used? If so, from which authority?
- Once collected, were data secured against unauthorized access?
    - Was access limited to appropriate staff?
    - Were these lists of staff reviewed periodically?
    - Was use of PII and other identifiers minimized as much as possible to prevent disclosure?
- Was non-aggregated data released for any purpose, except for an audit?
    - If data was released in cross-tabular form, did all cells represent at least three respondents?