



Implementing a Student-Level Data Network

Considerations from Data Reporters and Users

Prepared for

Gates Foundation
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Seattle, WA 98109

September 2025

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This report was prepared for the Gates Foundation. The findings and conclusions contained within are those of the authors and do not necessarily reflect positions or policies of the Gates Foundation.

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Background

Introduced in the 115th through 119th Congresses, the College Transparency Act (CTA) directs the U.S. Department of Education's (ED's) National Center for Education Statistics (NCES) to develop and implement a "secure and privacy-protected postsecondary student-level data system."¹ In establishing the student-level data network (SLDN), the CTA specially calls for a focus on the needs of both the "users of the data system" and "entities, including institutions of higher education, reporting to the data system." Further, it states that the SLDN should be developed "not later than 4 years after the date of enactment of the CTA." The scope of the effort, combined with the relatively short time span for development and implementation, necessitates proactive planning in order to develop and implement a successful system. However, ED is explicitly prohibited from working on an SLDN by the Higher Education Reauthorization Act of 2008.²

For these reasons, RTI International (RTI), often in partnership with the Institute for Higher Education Policy (IHEP), has been investigating and preparing for the possibility of a federal SLDN for a number of years. Efforts are chronicled on RTI's website ([Building a Federal Student-Level Data Network](#) ) and include the following: mapping of the data elements required in an SLDN, convening of experts and resultant white papers, examination of lessons learned from other countries and states, and a pilot data submission. Many of these efforts explicitly included institutions' points of view; however, given the wording in the legislation, we felt that a specific focus on the individuals and institutions who would likely submit and use the data is warranted.

ED—often with good intentions, but with implementation struggles—has forced changes and new data collections on already burdened institutions. For example, the visible FAFSA simplification rollout and Gainful Employment/Financial Value Transparency (GE/FVT) were both fraught with delays and other implementation challenges, which frustrated institutions. For the most part, these frustrations are focused on the *implementation* of the policy changes rather than on the changes themselves. However, these recent federal data challenges underscore the importance of planning SLDN implementation in conjunction with—and in ways that are responsive to—institutions' needs. Institutions are also one of the primary user groups of the data, so if institutions feel they are getting value from an SLDN, they will be more likely to engage as implementation partners, potentially yielding higher-quality data.

With that knowledge, this project sought to prioritize institutions' voices in two areas:

1. Understand, from the institutions' point of view, how to effectively implement a federal SLDN.
2. Understand how the data in an SLDN could benefit institutions.

¹ <https://www.congress.gov/bill/119th-congress/senate-bill/2511> (Congress.gov)


² [The Higher Education Opportunity Act: Reauthorization of the Higher Education Act](#) (Congress.gov)

Department of Education Context

As of the early fall of 2025, ED remains an active federal agency. However, ED has been hobbled by the cancellation of numerous projects, grants, and contracts, as well as the reduction in force of a large number of federal employees. At this current juncture, it is unlikely that ED—much less NCES, which has been reduced to just a few employees—would have the person-power to implement, or even oversee, a project as large and complex as an SLDN. That being said, it is possible that an SLDN could be implemented by a restaffed ED or assigned to a different federal agency for implementation. Given that a law establishing an SLDN could be passed at any given moment,³ we feel it is prudent to continue work to prepare for the possibility of an SLDN.

Methods

Working with our partner, Ebony Research Systems, we cast a wide net to identify potential focus group participants. We developed a description of the focus group topics, which was then distributed through channels targeted at individuals who work with postsecondary education data. For example, an announcement was posted in the Association for Institutional Research (AIR) Hub, which is designed to “connect data champions in higher education to learn from each other and share resources.”⁴ After reading a brief description of the project’s aims, interested individuals could fill out the screener questionnaire. The screener took approximately 2 minutes to complete and collected information on the following: whether the respondent works with or analyzes postsecondary data; institutional characteristics of the respondent’s employer (name and sector); personal characteristics (role and race/ethnicity); and contact information for scheduling. We received more than 130 responses to the screener. From the screener data, we purposively selected a diverse group of participants to contact for the focus groups. Our goal was to include voices from diverse backgrounds in order to obtain a broad range of perspectives. Overall information on the 57 participants in the focus groups is included in **Table 1**.

³ For example, the CTA was included in the House of Representatives’ larger America COMPETES Act in 2022, but was excluded from the final compromise bill between the House and the Senate. (Source: [House Approves College Transparency Act](#)  [Inside Higher Ed])

⁴ [Association for Institutional Research Hub](#)  (AIR)

Table 1. Institutional and Personal Characteristics of Focus Group Participants

Characteristics		Participants
Institutional		
Public, 4-year		12
Public, 2-year		9
Private, for-profit 4-year		2
Private, not-for-profit, 4-year		22
Public, 2- or 4-year system		7
Other (associations, etc.)		5
Personal		
Ethnicity	Other	9
	Hispanic	2
	Not Hispanic	46
Race	American Indian/Alaska Native	2
	Asian	1
	Black or African American	3
	Multiracial	5
	White	44
	Other	1
Role	Institutional researcher	30
	Institutional data (Analytics Director; Chief Data Officer; Assessment, Planning and Accreditation)	5
	Registrar/associate registrar	2
	Dean/provost-level office employee	14
	Researcher/policy analyst	6

Note: The number of responses to each screener question do not all sum to 57, as there were some missing responses.

We divided our 57 participants into ten focus groups of five to six people each. All focus groups were held in April 2025 via Zoom, with Ebony Systems moderating and RTI staff observing. Each participant received a \$100 gift card upon completion of the 90-minute focus group.

In addition to the focus groups, we held a discussion session at the 2025 AIR Annual Forum, which took place in May 2025 in Orlando, Florida. Approximately 35 people attended the session, where we provided background on the topic of a federal SLDN and distributed a 1-page document outlining early findings from the focus groups. We then invited participant's comments on these early findings. We specifically asked for areas of agreement or disagreement, as well as any themes they thought were missing. We incorporated the discussion-group feedback into our findings below.

We reviewed the transcripts, recordings, and notes from the focus groups and AIR session to identify overarching themes. Below, we present the findings using the themes that emerged from the data.

Findings

Topic 1 – How to Effectively Implement a Federal SLDN

Institutions of higher education, and the people who work in them, have experience and expertise in reporting data. We sought to capitalize on their experience and expertise and ask focus group participants, from their point of view, how a federal SLDN could effectively be implemented. Participants' responses centered around the following themes:

- Justify why an SLDN is needed and clearly state how the data will be used.
- Demonstrate ED's willingness to build back trust with the community.
- Define the data elements early and precisely, provide training and resources to institutions, and conduct a pilot study.
- Leverage existing data and processes.

Justify why an SLDN is needed and clearly state how the data will be used.

The federal government currently collects myriads of data both on postsecondary institutions and students. However, this patchwork system of data—collected by various agencies (ED, the National Science Foundation, etc.), at different levels (institution, student), and for different purposes (research, accountability)—means that there is not a comprehensive view of all postsecondary institutions and students. Thus, policymakers and the public are often left with missing information, especially on certain student subgroups. Focus group participants, who report and use these data, do see the value in a federal SLDN. However, the case needs to be made explicitly as to why this new effort is needed. Given the recent implementation challenges, one participant provided the following advice: “Don’t rush the process and make sure that you do talk with the stakeholders to make sure that they understand what you’re trying to get at.” Even though an SLDN would be required by law, participants felt that it is important to build the case for, and justify, an SLDN.

“Don’t rush the process and make sure that you do talk with the stakeholders.”

That justification should include how the data will be used. One participant remarked that ED should answer questions such as, “Are they looking for reasons to tell us whether or not we are a successful institution? Are they looking to find out how our funding is being spent? What’s the main thing?” To many participants, the main purpose of the SLDN should be to improve postsecondary education—most importantly, student outcomes. As one respondent remarked, “The strategy has to be that we’re going to do this to improve outcomes for students and citizens.” Gaining clarity on why an SLDN is needed and what the intended use of the data will be, and then communicating those points to the community, would help lay the groundwork for a successful SLDN.

Demonstrate ED's willingness to build back trust with the community.

Given that most of the participants submit data as part of their role, the idea of building (back) trust was a salient theme in the focus groups. After highly visible implementation challenges related to FAFSA and FVT/GE, the message to ED was clear: “Create an opportunity for ED and the institutions to walk hand in hand collaboratively together, as opposed to the institutions just feeling like we’re having to dish out this data to the federal entity that is requiring us to do so.”

“Create an opportunity for ED and the institutions to walk hand in hand collaboratively.”

Another stated that, “ED is going to face resistance until they start working with institutions instead of attacking.” Similar to justifying the need for an SLDN, building back trust with institutions and data providers is going to take time and purposeful engagement. Unfortunately, given the current state of ED, there is a lack of resources, both human and capital, to put toward relationship building.

Participants also stressed that engagement is not a “one-and-done” activity; rather, it should be ongoing and meaningful to design a system that meets the needs of ED. One commented, “We’re not trying to get in your way. That’s not what data people do. Data people want to design things so you get the answers that you want.” The data submitters are ready to engage with ED to help design a mutually beneficial solution, if ED will engage with them. As examples, participants remarked on the processes by which the U.S. Census Bureau developed the voluntary Postsecondary Employment Outcomes (PSEO) system, as well as the process by which the Integrated Postsecondary Education Data System (IPEDS) introduces new data elements.

“Data people want to design things so you get the answers that you want.”

On the other hand, participants contrasted what *should* happen with an SLDN to what *did* happen with the FVT/GE effort. One participant summed it up by saying, “Everything that they did with FVT/GE—none of it was good. None of it.” Even though focus group members listed many grievances with numerous ED implementations, they all gave the impression of being ready to (re)engage and work with ED to make an SLDN successful. They just asked that ED show a real willingness to work with them.

Define the data elements early and precisely, provide training and resources to institutions, and conduct a pilot study.

When asked for specifics of what ED could do to position an SLDN for success, responses centered around three themes. First, almost overwhelmingly, participants wanted to know what data elements would be required and the specific definitions of those elements. As participants noted, in order to report data to an SLDN, they first have to collect those data at their institutions. If an element is not currently collected, or if it is collected by a different definition, then their internal processes need to change—and that change is not necessarily quick or easy. One participant summed it up by saying, “We don’t mind following directions; we just want really clear directions.”

Second, the postsecondary “system” in America is diverse as there are 4-year institutions with hundreds of thousands of students and less than 2-year institutions with only a small number of

“Different institutions are going to need different things.”

students. Each and every one of these institutions will need support; however, what specific support will also vary. “Different institutions are going to need different things” is how one participant summarized it. Participants noted that “support” to them is a wide-ranging term that encompasses many aspects. As one participant

said, “I don’t think that dollars are going to solve the resource issue in and of itself.” Resources include, for example, engagement, as outlined above; clear definitions; Help Desk personnel who can answer detailed questions; and training for data providers, which was just removed from the current IPEDS contract.

Third, participants suggested a pilot study as a way to both engage institutions and test data collection procedures (RTI conducted a small pilot study⁵). People mentioned the possibility of breaking the implementation of an SLDN into smaller steps, akin to Agile design, and have different institutions test different aspects simultaneously: “The more it can be piloted at a smaller scale in terms of the number of entities from whom data is being collected, you figure out what are the difficulties. You try to resolve them and scale up slowly.” Focus group participants were willing to be involved in pilot efforts, as they recognized the value in preparing early and being able to help shape the final iteration. They recognize the hard work it will take to implement such a system while also realizing the importance of getting it right. As one participant said, “They need to test it to death before they roll this out to all.”

Leverage existing data and processes.

Institutions currently provide data to many different entities, such as the federal and state governments and multiple agencies within each, as well as many nongovernmental agencies such as the National Student Clearinghouse (NSC) and the Common Data Set. To help reduce this increasing burden, focus group participants stressed that they would like to have common definitions for these systems and, if possible, to be able to submit data to one entity. As one participant noted, “Using our systems already in place and leveraging them first...would reduce the burden on institutions.” Another was more explicit: “I don’t want to report the same data to the state of [redacted] and to NSC and any number of other places where I’m reporting it. I’d like to be able to report it, if I’m going to report it, to ED, and the state of [redacted] can work with ED to get what it needs.”

This participant is echoing a related theme that was present in the responses—namely, “What should [ED] do when implementing this SLDN? Make sure that the states are engaged.” As detailed in the SHEEO Strong Foundations reports,⁶ states implemented student-level data systems beginning in the 1970s. As a result, in addition to having data, states have valuable expertise and experience to offer a national effort. RTI has started

“Make sure that the states are engaged.”

⁵ [Piloting Data Submission for a Prospective Student-Level Data Network](#) (RTI)

⁶ [State Postsecondary Data](#) (SHEEO)

to look at these lessons.⁷ As one participant noted, “Really learn from what the statewide longitudinal data systems, the federal grant program, the SLDS, what have states that have really good functioning SLDS are like.”

Topic 2 – How Can Institutions Benefit from an SLDN?

Second, we asked focus group members how an SLDN could benefit them and their institutions. If the SLDN can be designed to be useful to institutions—the providers of the data—then reporting those data can be seen less as a burden and more as a potential benefit, which could increase the data quality. Participants’ responses centered around the following themes:

- Provide institutions data (that they do not already have) in a timely manner.
- Reduce institutional burden.
- Mitigate heightened concerns about data privacy and security.

Provide institutions data (that they do not already have) in a timely manner.

Institutions have a myriad of data on their students and their institution. However, they have far less data on students who transfer into, or out of, their institution. Overall, though participants mentioned data on students coming to their institutions, they stressed that having data on those students who leave their institution—with or without a degree—is more valuable to them. A federal SLDN would contain detailed information on these students, such as the Classification of

“We’re asking for a value-add on this data. We don’t want you to just spit us back what we just sent you.”

Instructional Programs (CIP) code of the awarded major, employment status, and occupation. Focus group participants desire new information on students, with one clearly stating, “We’re asking for a value-add on this data. We don’t want you to just spit us back what we just sent you.”

How the data or information is provided back to institutions was also a topic of discussion. Many participants stressed that having access to a dashboard tool that is prepopulated with data would be an improvement over the current, static feedback reports provided by IPEDS. Some participants expect more from an SLDN that will have access to student-level data. One participant suggested that a value-add would be that the government “should be using the data, analyzing it, and finding insights that are important, not just making a visualization and saying, ‘You find the insight.’” This is especially pertinent for those institutions with fewer resources to analyze the data. Another participant took it a step further, suggesting that their institution would like to be able to perform their “own kind of analysis... Be able to do a regression analysis... To have that kind of capability would be fantastic rather than just canned reporting.”⁸

Institutions want a value-add, including flexibility to define and answer research questions, and they want that capability in a timely fashion. Given people’s experiences with private industry,

⁷ [SLDN Landscape and Recommendations](#) (RTI)

⁸ Currently, ED provides the capability to perform advanced analyses like regressions through the DataLab tool. However, those analyses use data collected through research studies such as the National Postsecondary Student Aid Study (NPSAS) and the Beginning Postsecondary Students Longitudinal Study (BPS), not individual institutional data.

there is an expectation that information should be available back to them in almost real time. One participant noted, “We move way too slow. And so for me, I just cannot fathom this being a delayed system when we have too much understanding on how to do these systems in other spaces outside higher education.” Waiting a year (or more) after the start of a semester to have data on who is enrolled in that semester is too long. If institutions are to use the data for actionable insights and decision-making, those data need to be available in a timely manner.

Reduce institutional burden.

It is no secret that institutions are increasingly burdened by submitting data to a number of different government and private entities. This burden—and the potential increase of adding yet another reporting requirement—was top-of-mind for focus group members. Participants focused on two aspects of burden. First, in addition to what was discussed above, participants questioned if all current reporting was needed. As one focus group member commented, “It is not so much ‘*What is the burden?*’, but ‘*What are you going to take away?*’ If this [SLDN] can replace big chunks of IPEDS, then the burden is lower.” Second, how institutions report could also be used to lessen burden. “Everything’s living in the cloud. California has been trying to do a common enterprise system where every college has a data lake, or a lake house. All of our data gets extracted from our [student information system], fed into that system, and then the state can do what it needs to do with the data. No lift on us to do that.” If the government can assume more of the burden by setting up a system that extracts data from institutions, then the institutional personnel can focus on ensuring the data in their systems are correct. There is an opportunity for the SLDN to reduce burden on institutions, and from the focus group members’ point of view, that is an idea to keep front and center in the design.

“It is not so much ‘What is the burden?’, but ‘What are you going to take away?’”

Mitigate heightened concerns about data privacy and security.

Data privacy and security has been an evergreen concern since the creation of an SLDN was first proposed. Given that the focus groups were conducted in April 2025 amidst ongoing Department of Government Efficiency (DOGE) work, it is not surprising that focus group members reported heightened concerns in these areas. As one member said, “Part of my concern about the data privacy issue is the data being used for things that it was not intended for, because that’s what we’re seeing in the federal government right now, with data being shared from the IRS [Internal Revenue Service] to ICE [Immigration and Customs Enforcement]

“I firmly believe the risk is too great for the individual students who could be harmed by this type of database than the benefits for the many.”

and so on.” The theme of data being used by another agency and for purposes for which it was not intended was raised numerous times across the focus group sessions. Some participants, who in theory support an SLDN, went further; one stated, “I firmly believe the risk is too great for the individual students who could be harmed

by this type of database than the benefits for the many.” In this new era where all collected data

appear to be available to federal agencies, weighing the potential benefits against potential costs to students changed the equation for many.

Other participants expressed reservations about the federal government collecting data on unaided students. “Now they’re asking us to provide student-level data for students that they actually have no business—they’re not funding, they’re not supporting—they have no business knowing anything about.” Building a federal SLDN that only collects data on students who receive aid—such as Pell Grants, Direct Loans, and military and veteran education benefits—is proposed in the College Cost Reduction Act.⁹

Conclusions

The focus groups and discussions centered on the implementation of a federal SLDN yielded several critical insights that highlight the importance of transparency, trust, and clarity in the collection, management, and utilization of student-level data. Key findings suggest a strong need for ED to justify the necessity of an SLDN and to clearly articulate how the data will be managed and utilized. Participants emphasized the importance of restoring trust within the community, necessitating a demonstrated commitment from ED to engage sincerely with stakeholders.

A vital component discussed was the need to reduce the reporting burden on institutions. Participants underscored that the current landscape, characterized by duplicative data requests from various entities, creates significant strain on institutional resources. Therefore, it is crucial to establish centralized reporting systems that streamline the reporting process and alleviate the pressure on institutions to consistently submit the same information to multiple agencies.

The discussions also underscored the importance of defining data elements early in the process, providing comprehensive training to institutions, and conducting pilot studies to refine implementation strategies. Building an SLDN that supports data extraction and sharing can further enable institutions to focus on the integrity of their data rather than the logistics of reporting.

Based on the focus group outcomes, suggested next steps for building a federal SLDN include:

1. **Establishing Clear Justifications:** Develop and disseminate clear communications outlining the purpose and benefits of an SLDN to foster understanding and support among stakeholders.
2. **Building Trust:** Initiate open dialogue sessions with institutions to address concerns and collaboratively outline the implementation framework of the SLDN.
3. **Training Initiatives:** Create targeted training programs to equip postsecondary institutions with the necessary tools and knowledge for effective data reporting.

⁹ [H.R. 6951 - 118th Congress \(2023-2024\): College Cost Reduction Act](#) (Congress.gov)

4. **Burden:** Assess institutional reporting burden and develop ways to decrease burden through cooperation between states and the federal government.
5. **Pilot Programs:** Implement pilot projects that allow for testing and feedback on the SLDN infrastructure and processes, incorporating insights from participating institutions.
6. **Ongoing Evaluation:** Establish mechanisms for ongoing evaluation and refinement of the SLDN, ensuring it remains responsive to the needs of students and institutions alike.

By addressing these areas, ED can work towards a more effective and trusted federal SLDN that benefits the educational landscape and the students it serves.