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State Higher Education Executive Officers Association

# Better Data for Better Oversight: Modernizing Data Systems for Student Outcomes

**August 2025**

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## Acknowledgements

The author thanks Eric Ness, Mónica Maldonado, Will Walker, Matt Dean, Dustin Weeden, Rachel Burns, John Lane, Jessica Duren, Jessica Colorado, Jaxon Miller, Mia Sharpe, Will Rambo, Trevor Frank, Rohan Deulkar, Bridget Goodman, and Eddy Conroy for their research assistance, review, and feedback. This report was supported by funding from Arnold Ventures and Lumina Foundation.

# Introduction

State authorizing agencies collect a range of information when renewing postsecondary institutions (Baser et al., 2025), including student outcome metrics. Student outcome data is essential for decision-making in higher education, informing choices at the student, institutional, and state levels. Within state authorization—the gatekeeping process for institutional entry, continued operation, and closure—these data support oversight, accountability, and consumer transparency. Although student-level outcome data is increasingly available across postsecondary and P20W (preschool through workforce) state longitudinal data systems, especially for public institutions and those receiving state aid (Klein & Colorado, 2024), its role in state authorization remains inconsistent. Agencies rely on a wide range of infrastructures, collection methods, and reporting practices. Limited capacity, including staffing, technical resources, and institutional data literacy, often constrains agencies' ability to collect and effectively use this data (Hall-Martin, 2021). These range from basic collections of institution-level enrollment numbers submitted as PDFs on USB drives to Excel spreadsheets at the program level, to robust data systems capturing student-level outcomes. This brief summarizes the current landscape of student outcome data in reauthorization processes, examines the infrastructure for data collection and reporting, highlights an exemplar agency's practices, and concludes with recommendations.

# Methods

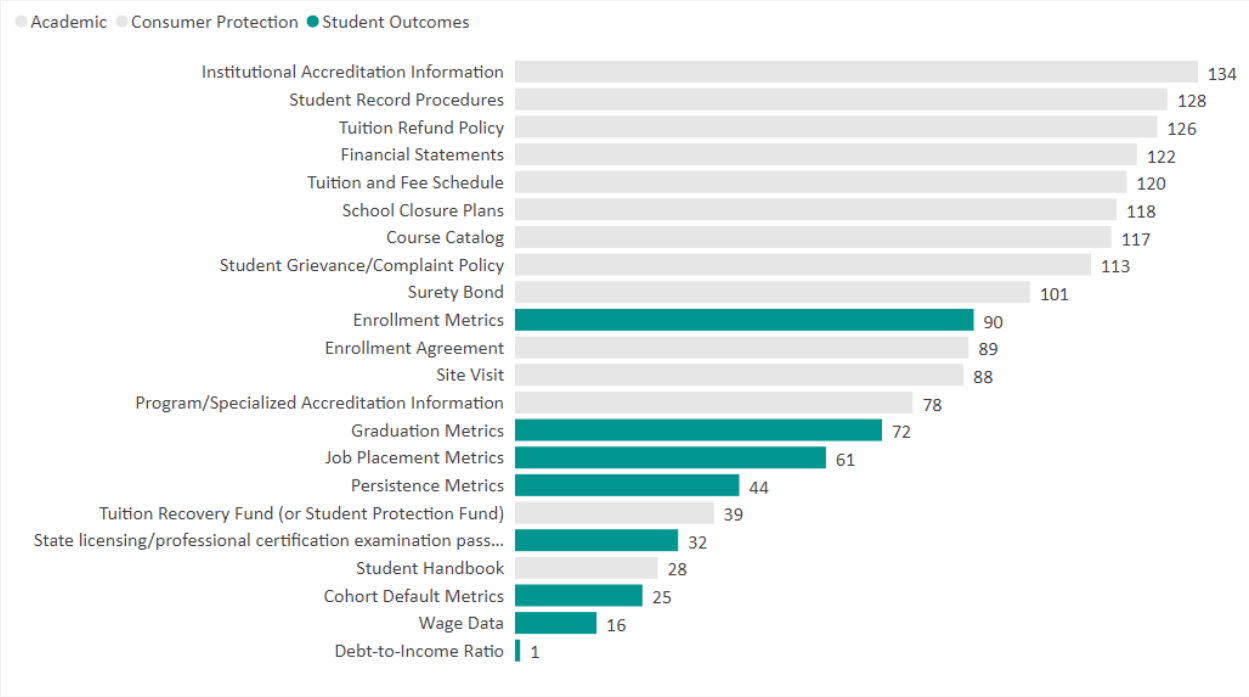
The findings in this brief are based on a nationwide inventory of state renewal and reporting processes and interviews with state regulatory staff, conducted as part of a comprehensive mixed methods study on state reauthorization (Baser et al., 2025). The study used a convergent parallel mixed methods design that combined a policy inventory of 22 academic, consumer protection, and student outcome metrics with interviews from 24 officials across 16 agencies in 11 states. The inventory reviewed state statutes, regulations, applications, and agency materials for more than 70 agencies and 164 unique institutional processes. This brief focuses on interview insights regarding data systems and eight student outcome metrics collected in the inventory: enrollment, persistence (retention or dropout), graduation, job placement, wage data, loan default rates, debt-to-income ratios, and state licensure passage rates.

# Student Outcome Data Collection in Reauthorization and Reporting

Despite growing attention to student success outcomes in higher education, student outcome metrics remain inconsistently collected in state authorization and reporting processes. The inventory shows these metrics are the least commonly required among academic, consumer protection, and outcome measures. As shown in *Figure 1*, all but one outcome metric (enrollment) ranks in the bottom half for collection frequency across the 164 processes reviewed. While enrollment is frequently collected, it serves more as an input measure for institutions rather than a true indicator of student outcomes. Notably, two of the most common student success metrics in higher education—completion and persistence—are required in fewer than half of all reauthorization processes.

**Figure 1**

Student Outcome Metrics Among the Least Collected in State Reauthorization



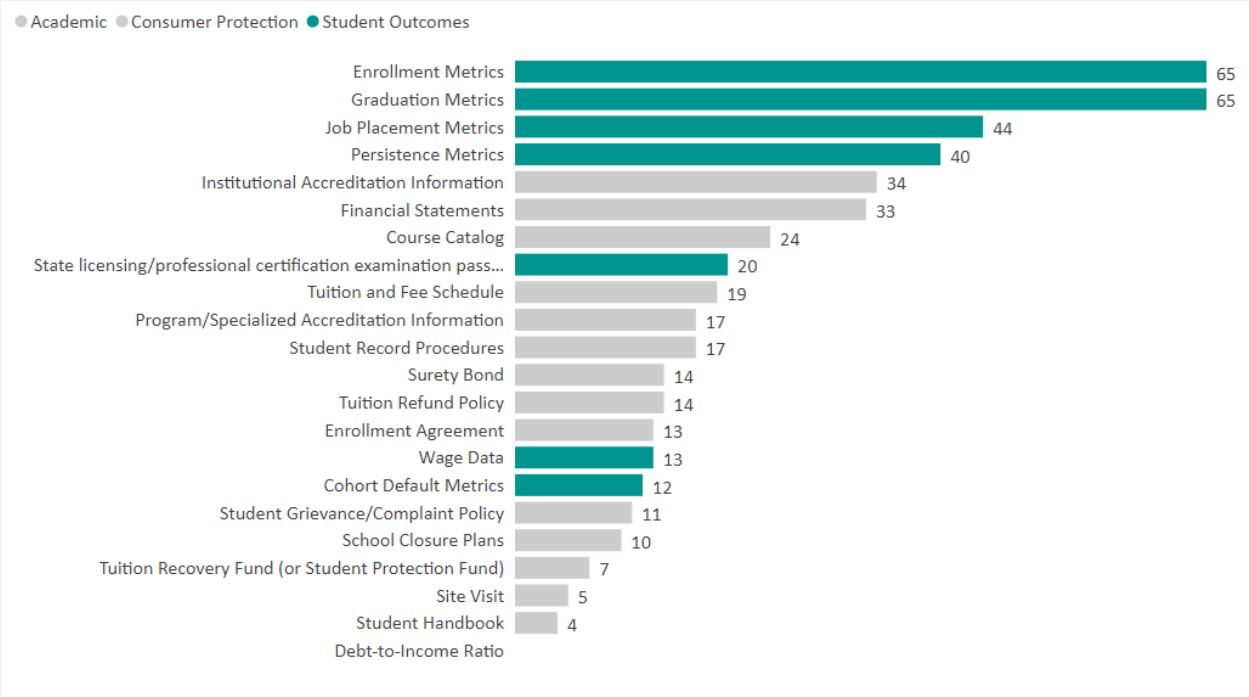

**NOTE:** This figure summarizes metric collection requirements for reauthorization across 164 distinct state authorization processes.
**SOURCE:** Baser, S. M. (2025). State postsecondary renewal: Data Download [Dataset]. SHEEO. https://sheeo.org/wp-content/uploads/2025/07/Data_Download_StateReauthorization.xlsx

Given that many reauthorization processes involve career and nondegree programs that recruit students with job placement promises, some agencies require institutions to report placement outcomes. However, far fewer agencies require institutions to report graduate wage data, despite its relevance as a key measure of student success and return on investment. Additionally, only a small number of agencies collect loan default rates or debt-to-income ratios—two metrics directly tied to affordability and a student's ability to repay educational debt.

In contrast, when agencies require additional reporting beyond the standard reauthorization process, student outcome metrics are more commonly collected. As shown in *Figure 2*, enrollment, graduation, job placement, and persistence are the top four metrics included in these reporting requirements. This suggests that when agencies elect to implement ongoing reporting, they often prioritize student outcome metrics to monitor institutional performance and student success between reauthorization cycles.

**Figure 2**

Student Outcome Metrics Among the Most Collected in Reporting Processes




**NOTE:** This figure summarizes metric collection requirements for additional reporting requirements across 164 distinct state authorization processes.
**SOURCE:** Baser, S. M. (2025). State postsecondary renewal: Data Download [Dataset]. SHEEO. https://sheeo.org/wp-content/uploads/2025/07/Data_Download_StateReauthorization.xlsx

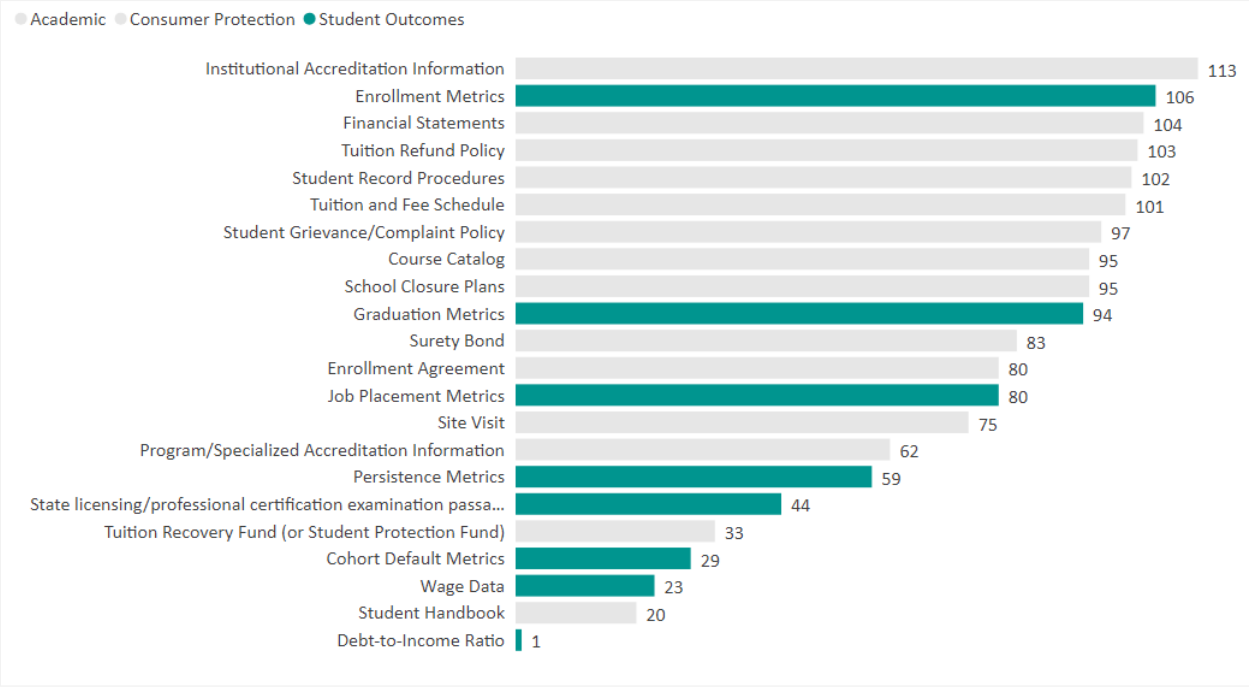
To better understand how agencies collect student outcome data over time, I also examined practices based on the frequency of data collection rather than labels like "reauthorization" or "reporting." Some agencies conduct annual reauthorization with no separate reporting process, while others authorize institutions every few years but require annual reporting. In some cases, agencies conduct both annual reauthorization and separate reporting processes, either annually or quarterly (New Jersey Department of Labor & Workforce Development and the Indiana Department of Workforce Development).

To provide a clearer comparison, I created a combined measure focusing on agencies that collect data annually, regardless of whether it is labeled as reauthorization or reporting.

*Figure 3* summarizes the most commonly collected metrics among the 128 processes that require data collection on an annual or more frequent basis. Each process is counted once per metric, even if agencies require the data for both reauthorization and reporting. This approach ensures a more accurate picture of what metrics are prioritized by agencies that maintain annual oversight of institutions.

**Figure 3**

Metrics Collected Annually in State Reauthorization or Reporting Processes




**NOTES:** This figure summarizes metric collection requirements across 128 distinct state authorization processes that require annual reauthorization or reporting. Each process is counted once per metric, even if required for both reauthorization and reporting.

**SOURCE:** Baser, S. M. (2025). State postsecondary renewal: Data Download [Dataset]. SHEEO. https://sheeo.org/wp-content/uploads/2025/07/Data_Download_StateReauthorization.xlsx

Two student outcome metrics rank among the top 10 measures collected by agencies with annual data processes. Enrollment ranks second overall, reported by 106 processes, and graduation follows behind, reported by 94. Regular oversight focuses attention on these core indicators alongside traditional academic and consumer protection measures. Enrollment's prominence reflects its role as a fundamental performance metric, as the basis for fee and bond thresholds, as the denominator for completion, persistence, and placement calculations, and as a gauge of institutional financial stability (declines in enrollment threaten revenue and may signal fiscal distress). By contrast, specialized metrics such as wage data (23 processes), loan default rates (29 processes), and debt-to-income ratios (1 process) remain among the seven least-collected measures, underscoring a narrow focus that leaves other outcomes largely unmonitored.

## Data Infrastructure for Collecting Student Outcomes Data

Agencies vary in how they collect and define outcome data. Some request only aggregate statistics—such as total enrollment—entered in a single fillable box on a PDF form. Others require program-level reporting with demographic breakdowns via spreadsheets listing enrolled, retained, graduated, and placed students. A smaller number collect student-level data through spreadsheets or secure portals,

each accompanied by precise definitions and reporting guidelines. For example, one state regulator described the process for submitting student-level outcome data: “If it's an existing school, we're asking… how many students enrolled, how many dropped out, how many graduated, how many are still enrolled in your school. And, then the graduates on either an Excel spreadsheet or they can upload it manually. We ask them the name of the student, when they started, their social, when they graduated, what course did they take?” She continued saying, “And, then what we want to know is, what kind of job they got. And so, based on the job, is where they're going to get their percentages. So, we got to make sure that if somebody took a course in welding that they got a job in welding.”

To streamline data collection and use, agencies rely on a variety of tools to manage renewal and reporting processes. These include Word and fillable PDF documents, Google Forms, SurveyMonkey, Excel spreadsheets, regulatory-specific software, and in-house web applications or data portals. Across all processes, the most common submission methods involve Word, PDF, and Excel files sent via email or uploaded through an online portal. In several agencies, these documents are not sent electronically. However, not all agencies accept electronic submissions. As one regulator explained, the renewal application “is submitted by mail, and it has to be postmarked, so it's a complete application.”

Another common approach is the use of web applications, either vendor-provided or in-house, which reduce agency and institutional burden by storing documents electronically and requiring updates only for changed content. These applications also support specific requirements or additional reporting through modular features. Notably, we found that offices within the same agency sometimes use different application processes, and even the same institutional process can involve separate collection methods for reporting and reauthorization.

In interviews with state agencies, we heard aspirations to improve data systems and acquire software, but progress was limited by funding constraints, agency capacity (time and specialized data literacy), and institutional resources. When asked about the technology used to streamline their work, one regulator remarked, “We're still kind of dinosaur that way. I use a spreadsheet. So, that's what I got right now.” This perspective was echoed across many interviews with agencies that had less developed data systems.

Another state regulator explained that, due to the lack of licensing software and a centralized database, they require specific documents to be updated during renewal and have “begged” for other documents, which rarely change, to be excluded from the process: “We do not have a database like some states. We have studied it. We want one. And then right now, our renewals are on paper. So, we buy file cabinets down the road. We'll have to scan them. When we get a database like Georgia's got, you know, our dream database… we'll still get the same things, but they'll be able to upload, just like I do with a lot of my reports in the [state].”

Other regulators described challenges in collecting student-level data from institutions, particularly due to limited capacity and data literacy at smaller “mom-and-pop” operations staffed by experts in their trade but less familiar with school administration. As one regulator explained, “A lot of them don't know exactly how things work. Usually, you have folks that are skilled in a particular field, and they have the

skills and the knowledge to be able to teach somebody, but they don't necessarily have the knowledge and understanding about how to run a school. So, a lot of the times we do, kind of indirectly help them with understanding that process."

Another regulator reflected on the quality of data received, stating, "I found that over the years when we try to get student-level data from [private career school] institutions, it was with some institutions it was nearly impossible to get accurate data. They just could not do it." This difficulty in obtaining reliable data from under-resourced institutions with few staff was a common theme among regulators managing career school renewals. The data collection process also underscores the multiple roles state regulators play, balancing consumer protection, academic quality control, and customer service.

## Using Student Outcomes Data for Oversight

While this brief focuses on student outcome data, both inventory and interview findings revealed that financial information remains the primary data point used by state agencies for oversight and enforcement activities. However, several regulators also discussed using (or aiming to use) student outcome data to guide their reviews and enforcement priorities. One state regulator with a robust system described how their renewal processes support oversight through both financial and student outcome information: "Every institution is required to submit a bunch of information to us every year. And, so we have a team of people that kind of processes the information received, which includes financials, includes information about student outcomes, and increasingly helps the team understand that information, so it can inform our broader operations. For instance, if we are seeing something problematic in that data, how are we using that to guide our enforcement priorities?"

Other regulators specifically described using student outcome data to verify the accuracy of information advertised by institutions, particularly when claims seemed questionable. In some cases, agencies identified concerns with predatory or struggling schools before other members of the triad became involved. As one regulator explained, "We had questions, at that time regarding [for-profit institution] outcomes with their placement statistics, and even prior to the Department challenging that, the FTC challenging that, we started asking questions that you're making these statements that are pretty bold. And, I just want to see how you come up with those numbers. How did you come up with a 98% placement rate, and the average starting salary is $45,000 a year? Well, let's look at the details. Who are you using to be a third-party reviewer of your information? So, that we have that level of confidence that that they're not just making stuff up, which, in their case, they're probably making stuff up, right? And then everybody else kind of got involved in that process."

Others, particularly those with more mature data systems, reported challenges not in collecting student outcome data but in having the capacity to analyze and use it effectively. When asked what they would prioritize with additional capacity, one regulator emphasized the need for stronger analytical support: "More qualitative analysis or actually more quantitative analysis. We really need to start leveraging data that we have to validate our decisions and validating that they're still good decisions…. So that's like a quality metric process really evaluating institutions for their outcomes, especially if they're coming from out of state."

Several regulators also expressed interest in sharing student outcome data with other entities, such as veterans approval agencies, other state regulators, and workforce agencies, to improve coordination, oversight, and student outcomes. However, the consistent theme across interviews was the burden this work places on agencies that are often understaffed and over capacity. Nearly every interviewee mentioned the need for more staff to support the collection, validation, and use of data within their agencies.

## Exemplar Agency: New Jersey Department of Labor and Workforce Development

The New Jersey Department of Labor and Workforce Development (NJDOL) oversees the approval and oversight of private career schools through a bifurcated process shared with the New Jersey Department of Education. While the Department of Education manages academic approval and quality, NJDOL administers business and administrative operations, including licensing and data collection. Institutions must renew authorization every two years and submit both quarterly student-level reports and an annual report. All applications and reporting requirements are completed through the department's licensing system: NJDOL Intelligrants (IGX).

### Best-in-Class Data Collection and Infrastructure

New Jersey's collection processes stand out for their comprehensiveness and integration. The biennial reauthorization process collects student outcome data, but more notably, NJDOL requires quarterly student-level reporting with detailed demographic information. These reports capture each student's enrollment date, completion date, and exit date, allowing the agency to self-validate data accuracy for enrollment, persistence, and graduation metrics. Additionally, private career schools must submit a student transcript form for each student annually and complete a program-level annual report on outcomes. The department's in-house system links institutional applications with student outcome data, creating a seamless infrastructure for oversight.

A particularly innovative feature of New Jersey's approach is the use of the Workforce Innovation and Opportunity Act's (WIOA) Eligible Training Provider List (ETPL) reporting requirements as a mechanism for collecting student-level data. Under WIOA, programs must be listed on the ETPL to be eligible for federal workforce development funding. In New Jersey, all private career schools are required to be listed on the ETPL, and programs on the list must submit reports through the IGX system. By applying these reporting standards to all private career schools, even those not participating in WIOA-funded programs, NJDOL ensures cross-program data alignment and enhances its oversight capacity.

### Proactive Use of Data for Oversight and Consumer Protection

NJDOL's robust data infrastructure enables the agency to monitor institutions in ways many others aspire to. Leveraging its position as the administrator of unemployment insurance records, the agency has developed an internal monitoring system that flags institutions showing signs of struggle, based on financials, student outcomes, and other review findings. This proactive approach aims to support both consumer protection—preventing harm from problematic institutions—and a customer service role, assisting schools that seek to improve through a performance improvement plan.

NJDOL also prioritizes transparency and public access to student outcome data. The New Jersey Training Explorer is a publicly accessible tool that empowers consumers to make informed choices about training providers (New Jersey Department of Labor and Workforce Development, n.d.). Drawing from institutional applications and student-level reporting, the portal offers detailed profiles with information on program cost, modality, length to completion, available services (such as accessibility accommodations and job placement assistance), and languages offered. Users can filter by CIP and SOC codes and view program-specific job placement rates and average salaries, calculated using internal wage records. Despite limitations for students who leave the state for work, this approach eliminates reliance on self-reported aggregate data and ensures prospective students have access to reliable, outcomes-based information.

# Recommendations

The findings from this brief highlight the importance of integrating student outcome data into state authorization and oversight processes. While financial data remains the most commonly used indicator for enforcement, student outcomes offer critical insights into institutional performance, student success, and consumer protection. However, resource limitations, inconsistent data systems, and institutional capacity challenges have hindered more widespread adoption.

The following recommendations offer practical steps to improve student outcome data collection, oversight, and transparency.

## 1. Begin Collecting Student Outcome Data

Agencies should start collecting key student outcome metrics (enrollment, graduation, persistence, job placement, and wages) at a minimum. Begin with program-level data disaggregated by demographics and other student factors relevant to the state's context. Over time, move toward student-level collections, which allow for more accurate validation of institutional reporting.

## 2. Ensure Regular Data Collection Through Reporting or Frequent Renewal

Establish regular data collection intervals, whether through annual reporting or more frequent renewal cycles. Consistent collection helps identify issues early and strengthens oversight. Tying these requirements to existing state or federal processes, such as workforce development or financial aid programs, can streamline efforts and reduce institutional burden.

## 3. Modernize Data Systems

Invest in modern data systems that integrate student outcomes with other oversight functions, such as institutional applications, program information, student complaints, and transcripts. While resource constraints often limit agency efforts, these investments are critical for effective oversight and improved public transparency. Modern systems reduce data silos, improve agency efficiency, and enhance service to students and institutions alike. Importantly, linking data with other agencies, such as licensure boards and workforce agencies, allows for a more complete picture of student outcomes beyond what institutions self-report, enabling measurement of employment, earnings, and licensure attainment.

### 4. Reduce Institutional Burden Through User-Friendly Tools and Processes

Support institutions, especially those with limited data expertise, by providing clear templates, training materials, and example documents. Setting expectations early, such as during initial authorization, can ease future reporting. When it makes sense, allow accredited institutions or Title IV participants to submit existing reports (e.g., IPEDS data) to fulfill requirements, with follow-up verification through public records or accreditation documentation.

### 5. Use Student Outcome Data for Both Oversight and Consumer Information

Agencies should leverage student outcome data not only for regulatory oversight but also to inform prospective students. Using verified outcome data to monitor institutional performance and to support consumer-facing tools enhances accountability, improves decision-making, and builds public trust. These outcomes are essential for understanding the value and return on investment of postsecondary institutions.

## Conclusion

Student outcome data is essential for oversight, informed consumer choice, and understanding the value and return on investment of postsecondary institutions. However, agencies face significant challenges in collecting and using this data. Many of these barriers, including limited resources, outdated systems, and institutional capacity constraints, cannot be addressed by agency staff alone. Support from state leadership and collaboration with other higher education partners is necessary to build stronger data practices. By taking practical steps and securing needed resources, agencies can improve accountability and achieve better outcomes for students.

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