



U.S. Department of Education
Office of Inspector General

Quality of Data Reported through the Department's Integrated Postsecondary Education Data System Surveys by Spring Hill College

May 13, 2025
ED-OIG/I24IL0214

INSPECTION REPORT

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UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

Audit Services

May 13, 2025

Dr. Mary H. Van Brunt
President
Spring Hill College
4000 Dauphin Street
Mobile, Alabama 36608

Dear Dr. Van Brunt:

Enclosed is our final report, "Quality of Data Reported through the Department's Integrated Postsecondary Education Data System Surveys by Spring Hill College," Control Number ED-OIG/I24IL0214. The U.S. Department of Education's policy is to expedite inspection resolution by timely acting on findings and recommendations. Therefore, if you have any additional comments or information that you believe may have a bearing on the resolution of this inspection, you should send them directly to the following Department of Education officials, who will consider them before taking final Departmental action on this inspection:

James Bergeron
Acting Chief Operation Officer for Federal Student Aid
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Matthew Soldner
Acting Director of the Institute of Education Sciences
Institute of Education Sciences
550 12th Street, SW
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We appreciate your cooperation during this inspection. If you have any questions, please contact Tracie Goff-Smith, Assistant Director, Higher Education Oversight Team, at Tracie.Goff-Smith@ed.gov or me at (202) 987-0173 or Sean.Dawson@ed.gov.

Sincerely,

/s/

Sean Dawson
Assistant Inspector General for Audit

Enclosure

Results in Brief

Quality of Data Reported through the Department's Integrated Postsecondary Education Data System Surveys by Spring Hill College



Why Did the OIG Perform This Inspection?

Section 487(a)(17) of the Higher Education Act of 1965, as amended (HEA), requires postsecondary schools participating in Title IV programs to annually report data, including data relevant to students' cost of attendance, financial aid, and the schools' graduation rates, to the U.S. Department of Education's (Department) Integrated Postsecondary Education Data System (IPEDS) to the satisfaction of the Secretary. IPEDS data are available to the public, including students, parents, and researchers, and can be used to analyze trends in postsecondary education. They also can help students attending postsecondary schools, prospective students, and their parents compare postsecondary schools and make informed school enrollment decisions.

The objective of our inspection was to determine whether Spring Hill College reported verifiable data to IPEDS for the 2021–2022 reporting period.

What Did the OIG Find?

We determined that Spring Hill College reported verifiable data to the Department's IPEDS for the 2021–2022 reporting period. Specifically, all data elements that we selected and reviewed that the school reported through the Graduation Rates, Institutional Characteristics, and Student Financial Aid surveys for the 2021–2022 reporting period were supported by datasets, information system reports, or other records.

What Are the Next Steps?

Because all the data sets that we reviewed were verifiable, we do not make any recommendations in this report. However, our results are limited to the data sets we reviewed, and it is critical that Spring Hill College continue to report verifiable data to IPEDS. Spring Hill College was provided with a discussion draft during the exit, the school agreed with our conclusions and had no comments.

Introduction

Background

Spring Hill College is a private nonprofit coeducational liberal arts and sciences college. It is accredited by the Southern Association of Colleges and Schools Commission on Colleges; with programs accredited by the Alabama State Board of Education and the Commission on Collegiate Nursing Education.

Spring Hill College offers bachelor's degrees in more than 45 undergraduate majors and concentrations and master's degrees in five fields. It also offers multiple certificate programs. During the 2021–2022 reporting period, 1,317 students were enrolled in the school.¹

Title IV Programs and Funding Information

Programs authorized by Title IV of the Higher Education Act of 1965, as amended (HEA), provide financial assistance to postsecondary students and their parents through grants, work-study, and loans. During award year 2021–2022, Spring Hill College participated in five Title IV programs—the Pell grant program, Teacher Education Assistance for College and Higher Education grant program, William D. Ford Federal Direct Loan Program, Federal Supplemental Educational Opportunity Grant Program, and Federal Work-Study Program. For award year 2021–2022, Spring Hill College disbursed about \$8.5 million in Title IV funds to its students.

IPEDS, Surveys, and Keyholders

The National Center for Education Statistics (NCES) within the U.S. Department of Education's (Department) Institute of Education Sciences oversees the Integrated Postsecondary Education Data System (IPEDS). It is responsible for collecting, analyzing, and reporting education statistics. NCES collects data through a set of 12 annual surveys, including the Student Financial Aid (SFA), Graduation Rates, and Institutional Characteristics surveys.

- The SFA survey collects data on the amount of financial aid, including the amount of grants, scholarships, Federal work-study, and loans received by all undergraduate students. Part D of this survey collects information used to

¹ Our inspection covered the 2021–2022 reporting period, the most recent period for which final data from the IPEDS were available as of the start of our inspection in November 2024.

estimate the average net price for Group 3 students.² Section 132(a)(3) of the HEA defines the net price as the average yearly price charged to full-time undergraduate students who are seeking their first certificate or degree and receiving financial aid. According to the IPEDS survey materials for the 2021–2022 reporting period, the net price is the school’s cost of attendance less the average amount of financial aid (excluding Federal Higher Education Emergency Relief Fund grants) that Group 3 students received from the Federal government, the State, and the school.

- The Graduation Rates survey collects data on the number of full-time undergraduate students who began attending a school in a particular academic year, were seeking their first postsecondary certificate or degree, and completed their program of study within 150 percent of the normal time for completion (1.5 years for a 1-year program, 3 years for a 2-year program, and 6 years for a 4-year program). The Department uses this data to calculate a school’s graduation rate.
- The Institutional Characteristics survey collects data on average tuition and fees, books and supplies, room and board, and other expenses that a school charges to full-time undergraduate students who are seeking their first certificate or degree.

Section 487(a)(17) of the HEA requires postsecondary schools participating in Title IV programs to annually report data, including data relevant to students’ cost of attendance and financial aid and the schools’ graduation rates, to the Department through IPEDS surveys to the satisfaction of the Secretary. The “New Keyholder Handbook for the IPEDS Data Collection: 2021–22” states that the Department relies on postsecondary schools to report accurate data through the IPEDS surveys. Also, the IPEDS survey materials tell schools to report accurate and correct data.

IPEDS data are available to the public, including students, parents, and researchers, through the Department’s [College Scorecard](#), [College Navigator](#), and [IPEDS Data Center](#) websites.

- The College Scorecard is a search tool designed to provide transparency and consumer information relevant to postsecondary schools. It brings together

² Group 3 students are all full-time, first-time certificate- and degree-seeking undergraduate students who enrolled in the prior fall and were awarded financial aid from the Federal government, a State, and the school.

information on postsecondary education costs, graduation rates, student loan debt, post-college earnings, and more.

- The College Navigator is a consumer information and college search tool designed to help postsecondary school students, prospective students, and their parents understand the differences between postsecondary schools and how much it costs to attend each school.
- The IPEDS Data Center is a centralized, web-based tool for the retrieval and analysis of IPEDS data. It allows users to access and evaluate postsecondary school data using analytical features.

The “New Keyholder Handbook for the IPEDS Data Collection: 2021–22” requires each postsecondary school to appoint an IPEDS keyholder. A school’s keyholder is responsible for accurately and timely submitting all applicable IPEDS survey components. The keyholder’s responsibilities include entering data into the IPEDS Data Collection System, resolving all issues and errors, and locking each component once it is complete and correct. The keyholder also serves as the school’s point of contact with NCES.

Results of Our Review

Spring Hill College reported verifiable data to the Department's IPEDS for the 2021–2022 reporting period for the selected data elements covered by our review. Specifically, all data elements that we selected and reviewed that the school reported through the Graduation Rates, SFA, and Institutional Characteristics surveys for the 2021–2022 reporting period were supported by datasets, information system reports, or other records. We reviewed statistical random samples of students included in the data reported in the Graduation Rates and SFA surveys for this reporting period. For the students reviewed, relevant data elements were supported by the students' official transcripts, admission records, and ledger cards. We reviewed the cost of attendance data reported by Spring Hill College in the Institutional Characteristics survey. The tuition, fees, books and supplies, room and board, and other expenses reported by Spring Hill College in the Institutional Characteristics survey were supported by records that the school provided.

Because all the data sets that we reviewed were verifiable, we do not make any recommendations in this report. However, our results are limited to the data sets we reviewed, and it is critical that Spring Hill College continue to report verifiable data to IPEDS. Spring Hill College was provided with a discussion document during the exit conference meeting. Spring Hill College agreed with our conclusions and had no comments.

Appendix A. Scope and Methodology

Our inspection covered selected data elements that Spring Hill College reported through the SFA, Graduation Rates, and Institutional Characteristics IPEDS surveys for the 2021–2022 reporting period, the most recent period for which final data were available as of the start of our inspection. To accomplish our objective, we reviewed

- sections 132(a), 485(a)(1)(E) and (L), 485(a)(3) and (4), and 487(a)(17) of the HEA;
- 34 Code of Federal Regulations sections 668.14(b)(19), 668.16(c)(1) and (d)(1), and 668.45;
- NCES’s “New Keyholder Handbook for the IPEDS Data Collection: 2021–22” as it relates to the Institutional Characteristics survey, as the information for the 2021–2022 reporting period is collected in the fall of the 2021–2022 collection period;
- NCES’s “New Keyholder Handbook for the IPEDS Data Collection: 2022–23” as it relates to the SFA and Graduation Rates survey as the information for the 2021–2022 reporting period is collected in the winter of the 2022–2023 collection period;
- Volume 2, Chapter 6 of the “2021–2022 Federal Student Aid Handbook,” and
- the IPEDS website.

We also reviewed Spring Hill College’s website, annual compliance reports, and annual financial statement audit reports; and records that school officials provided to us (see [Analysis Techniques](#)). Additionally, we interviewed Spring Hill College officials and reviewed the completed surveys that school officials provided to us.

Sampling Methodology

We used sampling to achieve our objective. For the SFA survey, we obtained from Spring Hill College the population of 216 students who were full-time undergraduate students, enrolled in the school in the fall of academic year 2021–2022, and seeking their first postsecondary undergraduate certificate or degree. For the Graduation Rates survey, we obtained from Spring Hill College the population of 385 students who were full-time undergraduate students, began attending the school during academic year 2016–2017, were seeking their first postsecondary certificate or degree, and completed their program within 150 percent of the normal time for graduation from that program.

We then selected 2 random statistical samples, one consisting of 52 students included in the SFA survey and another consisting of 54 students included in the Graduation Rates

survey, using an expected error rate of zero. This sample design allowed for acceptance or rejection of the verifiability of the data for each student in the population at a 95 percent confidence level. If the data for three or more sampled students (approximately 5 percent) could not be verified, the data for the entire population would be considered unverifiable, as the sample would fail to meet the minimum tolerable accuracy rate of 95 percent.

Analysis Techniques

We evaluated the verifiability of the final data elements that Spring Hill College reported through the Graduation Rates, Institutional Characteristics, and SFA IPEDS surveys for the 2021–2022 reporting period. We concluded that the final data elements were verifiable when the records in the school’s information system matched the data reported through the three IPEDS surveys.

Graduation Rates Survey

To determine whether Spring Hill College accurately categorized students, we randomly selected and reviewed the school’s records for 54 of the 385 full-time undergraduate students who were enrolled in the fall of 2021 and seeking their first postsecondary certificate or degree. We traced relevant data elements to the students’ official transcripts and admission records. We concluded that the school accurately categorized the students if its records showed that each of them completed their program by the end of academic year 2021–2022 (150 percent of the normal time for a 4-year program), was a full-time undergraduate student who began attending the school during academic year 2016–2017, and had not previously sought a postsecondary education credential.

Institutional Characteristics Survey

To determine whether Spring Hill College reported verifiable cost of attendance data, we traced the amounts reported through the survey to the records that the school provided as support. We concluded that the school reported verifiable cost of attendance data if its records and other documentation supported the amounts reported through the Institutional Characteristics survey for the 2021–2022 reporting period.

SFA Survey

We randomly selected and reviewed the school’s records for 52 of 216 students to determine whether the school accurately categorized them as full-time undergraduate students who were enrolled in the fall of 2021 and seeking their first postsecondary certificate or degree. We traced relevant data to the students’ official transcripts. We also reviewed the school’s admissions records to determine whether the students had prior postsecondary education experience. We concluded that Spring Hill College

accurately categorized the students if its records showed that they were full-time undergraduate students who were enrolled in the fall of 2021, were seeking their first postsecondary certificate or degree, and received financial aid from the Federal government, State government, and the school during academic year 2021–2022.

To determine whether Spring Hill College reported the correct amount of financial aid that its students received from the Federal government, State government, and the school, we traced the amount of the student’s financial aid shown in a report generated by Spring Hill College for IPEDS reporting purposes to the student’s ledger card. We concluded that the school reported the correct amount of financial aid if the amount recorded in the report matched the student ledger card for the 2021–2022 reporting period.

Use of Computer-Processed Data

We relied, in part, on computer-processed data from Spring Hill College’s student information system. We used the data to identify the populations for our two samples and to obtain student records, such as transcripts and financial aid. Because the objective of our inspection was to assess the verifiability of the data reported through the SFA, Graduation Rates, and Institutional Characteristics IPEDS surveys, we did not separately assess the reliability of the student data from Spring Hill College’s student information system.

Compliance with Standards

We conducted our work in accordance with the Council of the Inspectors General on Integrity and Efficiency’s “Quality Standards for Inspection and Evaluation.” Those standards require that we plan and perform our work to obtain sufficient and appropriate evidence to support our findings and provide a reasonable basis for our conclusions. We believe that the evidence obtained provides a reasonable basis for our conclusions.

We conducted our inspection remotely from November 2024 through March 2025. We held an exit conference meeting with Spring Hill College officials on March 26, 2025, to share the result of our review. Spring Hill College officials had no comments on the results of our review.

Appendix B. Acronyms and Abbreviations

Department	U.S. Department of Education
HEA	Higher Education Act of 1965, as amended
IPEDS	Integrated Postsecondary Education Data System
NCES	National Center for Education Statistics
SFA	Student Financial Aid