COUNCIL
ON INTEGRITY
IN RESULTS
REPORTING

STUDENTS FIRST

Standards and Implementation

Governing Outcomes Reports for 2018 Graduates
Rev. 2019-07-05

Welcome to CIRR! Membership in CIRR requires following six standards:

1. **Advertising and disclosing honestly.** CIRR schools follow a set of truth in advertising rules that prohibit misleading outcomes claims.
2. **Collecting students' intent.** No later than the first day of class, CIRR schools survey students as to their intent after graduating. This information, along with a list of all enrolled students, is submitted to auditors immediately. Surveying intent by the first day of class and submitting to an auditor prevents schools from manipulating their results later.
3. **Tracking enrollment and graduation.** For every enrolled student, CIRR schools track their on-time and late graduation rates as part of their outcomes reports.
4. **Tracking job outcomes.** After students graduate, CIRR schools follow up with job-seeking students to track what jobs they find and when.
5. **Reporting students' outcomes.** Every six months, CIRR schools release standardized reports of student outcomes.
6. **Auditing outcomes data.** Once a year, CIRR schools have their outcomes report reviewed by an approved third party that checks to make sure there is evidence for the outcomes the school claims.

Advertising and Disclosing

Graduation Requirements Disclosure

CIRR schools must clearly publish requirements for a certificate of completion and include them as part of their enrollment agreements with students. We recommend you do this as soon as practically possible, even before joining CIRR.

Enrollment Agreement Disclosure

We also suggest you include language in your enrollment agreement authorizing you to contact graduates' employers to provide employment verification documentation. You may also wish to include language letting students know to expect you to contact them and asking them to agree to respond to your post-graduation inquiries about job placement.

Truth in Advertising

Before joining CIRR, we recommend you discontinue advertising outcomes figures that do not comply with the CIRR standards, so as to avoid sudden changes in your advertised outcomes figures. CIRR members must follow the below standards; while you won't have outcomes to advertise until you issue your first report, we recommend that you understand them before joining so that you can begin phasing out any advertising that does not comply.

Records

For each advertisement or public communication that uses outcomes statistics, records must be kept that document which graduates were used to calculate the statistics in accordance with the CIRR standards.

Advertising In-Field Employment

For any advertisement or public communication (except those required by regulatory and licensure reporting) that makes a claim about the rate of “in-field” (or equivalent language) employment, the only graduates who may be counted as “in-field” (or equivalent) are those who have met the documentation criteria for Employed In-Field on the CIRR report.

After the release of school's first cohort reported under CIRR standards, schools may not advertise or issue a public communication regarding in-field employment that includes graduates not covered by a cohort report publicly released under CIRR standards.

Advertising Salaries

The primary salary number in any advertisement must be median salary as computed under CIRR standards.

Any advertisement or public communication (except those required by regulatory and licensure reporting) about salaries must be accompanied by a "clear and conspicuous" disclosure of the percentage of all graduates who reported salaries (in the report from which the salary figure was taken). If the advertising format in a given ad is too small for the disclosure, then salary information may not be advertised.

Advertising Graduation Rates

For any advertisement or public communication (except those required by regulatory and licensure reporting) that makes a claim about the graduation rate, for programs with a published program length, the only number that may be used is the percentage of students who graduate within 100% of published program length (on-time); for self-paced programs, the only number that may be used is the percentage graduated during the reporting period as calculated and reported under CIRR standards.

Aggregation

For any advertisement or public communication (except those required by regulatory and licensure reporting) that aggregates results from multiple periods, the aggregation may not span more than a 12 month period and the advertisement must state in a clear and conspicuous manner the time periods that have been aggregated.

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Collecting Students' Intent

Even if you aren't ready to implement any other part of the CIRR standard, your school should begin administering this survey as soon as possible and submitting it to an auditor (contact CIRR for a list of approved auditors), as it cannot be administered or submitted retroactively. An easy way to administer this survey is to make it part of the onboarding materials for new students.

Within 3 days of the school's final date for receiving a full refund (as defined in the CIRR definition of "enrolled students"), the following survey must be administered:

1. Are you legally authorized to work in the country where you are studying? (Yes/No)
2. Are you legally authorized to work in the country where you will be job searching? (Yes/No)
3. What are your primary intentions for enrolling in this program?
    a. I intend to start a new job in-field job within 180 days of graduation.
    b. I intend to remain with my current employer upon graduation.
    c. I am attending the program to learn new skills for self-enrichment and do not intend to pursue an in-field job upon graduation.
    d. I intend to continue education at an accredited post-secondary institution and do not intend to pursue an in-field job upon graduation.

A list of all students enrolled on the first day of class, including their responses to the survey above, must be submitted to a CIRR-approved auditor by the third day of class.

Note: The data from this survey will not be used in CIRR reports until March 2020.

Tracking Enrollment and Graduation

When implementing CIRR standards, it is crucial to use a system to track each one of your students. Many schools use customer relationship management (CRM) software, but at the very least, you should use a spreadsheet with a row for each one of your students and a column for each field described below (you can even use a copy of the CIRR Report Worksheet).

When you enroll a new student, add them to your CRM (or spreadsheet). Create a field (or column in your spreadsheet) for their enrollment status and give them the status of "Enrolled" (or something similar).

Enrolled students are all students in a course as of (i) the final date under applicable state regulations on which the school is required to provide the student with a full tuition refund, or (ii) if applicable state regulations do not contain such a requirement, the final date as specified in the school's published policies on which a student may receive a full tuition refund. The full tuition refund may exclude nominal non-refundable registration fees.

Enrolled students do not include students who died, became incarcerated, or were called into active military duty during the course, but the student list should contain documentation supporting that classification. In the case of self-paced programs dealing with students with multiple start dates (who may return after pausing or dropping out), a student should only be counted using the earliest start date.

If your program has a fixed length, create a field identifying which cohort students start in so that you know their start date and on-time graduation date; also create another field for the cohort they finish in, so that if they transfer to a new cohort, you can accurately report the graduation date for their original cohort.

If your program is self-paced, create fields for students' start and graduation dates.

If a student withdraws, change their status to "Withdrew" (or something similar).

When a student graduates, update their status to "Graduated". Graduates are all students who met the published graduation requirements and received a certificate of completion.

Tracking Job Outcomes

Tracking job outcomes is the heart of the CIRR standard. Create another field in your CRM or spreadsheet for each graduate's employment status. (Alternatively, track this data in the same field as the enrollment status.) Create a status for each of the CIRR outcomes:

- Full-time employee (1A)
- Full-time apprenticeship, internship, or contract position (1B)
- Hired by school in-field (1C)
- Started a new company or venture after graduation (1D)
- Short-term contract, part-time position, freelance or unknown length (1E)
- Hired by school out of field (2A)
- Out of field (2B)
- Still seeking a job (3A)
- Not seeking a job (3B)
- Non-reporting (4)
- Excluded

Process

Upon graduation, first categorize every student who responded to the pre-class survey who did not intend to start a new job in-field job within 180 days of graduation with the status of "Excluded". Then categorize every remaining student as "Still seeking a job".

If your school is regularly in touch with your graduates about their job search, be sure that as your students report their employment outcomes, your career services staff obtains the required CIRR documentation (explained below). If your school does not contact all of your graduates on a regular basis, we recommend that you implement a follow-up schedule for outreach at least once a month after graduation to ensure that you gather the required documentation in a timely manner. The more time that elapses between a student's employment and your outreach to gather documentation, the less likely you are to obtain that documentation.

Documentation requirements

To report a student as having any outcome except "Still seeking a job", the school must obtain documentation from the graduate, the graduate's employer, a third-party recruiter, or legal, credentialed third-party employment history service.

The documentation may be verbal or written, including any electronic communication, such as email, text message, chat, or electronically submitted form. For information obtained verbally, the records must contain a written statement indicating:

1. The date of the conversation,
2. The school representative or agent who conducted the conversation,
3. The person who provided the information, and if that person is not the student, the person's relation to the student, and
4. The content of the conversation as relates to the data being collected.

Non-job outcomes

Non-reporting: If the school attempts to contact the student a minimum of 4 times through 4 different means of communication, and the student never responds, the student may be classified as "Non-reporting". The school must keep documentation including the dates of the attempted contacts and the student's contact information used in those attempts.

Not seeking a job: The graduate states that she or he is not pursuing employment because he or she (a) took the program solely for self-enrichment, (b) has had a medical or family emergency arise post-graduation, (c) is continuing education at another institution, or (d) does not have a visa to work in the country in which took the program. (For the avoidance of doubt: if a non-visa holder finds work, in or out of the country where they took the program, they would more likely be categorized as another code.)

Started a new company or venture: The graduate states that she or he is pursuing entrepreneurship full-time in lieu of searching for a job. The endeavor may be for-profit or not-for-profit.

Job outcomes

Documentation for all job outcomes must:

- State either the offer date or start date. (If both are available, use the earlier to compute placement data.)
- State that the offer is paid. (Exact payment rate is not required. Unpaid offers do not qualify.)
- Indicate that the offer was accepted.

Documentation for in-field positions must either:

- Include a statement that the job requires the skills for which the student was trained at the school; or
- Have a job title that would fall under an in-field classification used by Bureau of Labor Statistics SOC codes.

Documentation for "Full-time employee" roles must:
- State that the offer or contract is permanent, at-will, or greater than six months.
- Indicate that the job is full-time, or at least 30 hours per week.

Documentation for "Full-time apprenticeship, internship, or contract position" roles must:
- State that the offer or contract is three to six months.
- Indicate that the job is full-time, or at least 30 hours per week.

For the avoidance of doubt: a contract-to-hire arrangement, wherein a contract states a three-month employment, and a potential full-time offer thereafter, counts as "Full-time apprenticeship, internship, or contract position", until a permanent offer is documented.

Documentation for "short-term or part-time" roles must:
- Indicate that the student would be employed or contracted for at least 150 hours.

Documentation for "unknown" roles must:
- Be a screenshot of the student's LinkedIn profile.
- If the profile includes the month the position started, the last day of that month may be used for the start date. If the profile does not, the date of the screenshot may be used.
- The "unknown" status may only be used if a student would otherwise qualify as "non-reporting".

Salary includes only base compensation, and excludes bonuses, equity, relocation, and any other non-base compensation. If a student has held multiple positions, use the salary of the position accepted last to determine the student’s offer or start date. If salary information is known, it must be included.

Documentation Summary:

Status	Category	Duration	Hours	In-Field?	Other Requirements
1A	Full-time employee	6+ months	30+ hours/week	Yes	---
1B	Full-time apprenticeship, internship, or contract position	3-6 months	30+ hours/week	Yes	---
1C	Hired by school in-field	6+ months	30+ hours/week	Yes	---
1D	Started a new company or venture after graduation	---	---	---	Graduate statement
1E	Short-term contract, part-time position, freelance, or unknown length	>=150 hours total	>=150 hours total	Yes	---
2A	Hired by school out-of-field	>=150 hours total	>=150 hours total	No	---
2B	Hired out-of-field	6+ months	30+ hours/week	No	---
3A	Still seeking a job (in-field)	---	---	---	---
3B	Not seeking a job	---	---	---	Graduate statement
4	Non-reporting	---	---	---	Outreach records

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Reporting Students' Outcomes

Every six months, CIRR schools release an outcomes report. Each report must cover graduates from either 1/1-6/30 or 7/1-12/31 of the chosen year. Outcomes must be calculated and reports must be generated using the CIRR Outcomes Report Template spreadsheet, available at cirr.org/standards. There are two spreadsheets, one for fixed-length and one for self-paced programs.

Fill in the blanks

Before producing your report, go back and check all of your data. (You may wish to do this 180 days after each class graduates, rather than waiting until the end of the reporting period.) If you've followed the procedures described in these standards, you should have all of the data and documentation you need to produce an accurate CIRR report. In practice, you may find that you are missing documentation on some students, have not reached out to some students enough to qualify them as non-reporting, or have not followed up with all of your "still seeking" graduates or "short-term contract" graduates who may have found more permanent work since. Complete any missing follow-up and obtain any missing documentation.

Produce your CIRR report

Use the CIRR outcomes report template spreadsheet to create your report to submit to CIRR. If you have followed the above steps, you can simply copy information from your CRM into the spreadsheet.

Course Length

For fixed-length programs, the Published Course Length must be in calendar days such that the following statement is true: If a student needs to repeat a module/section prior to meeting the graduation criteria, he or she should not count as graduated in 100% of the program length.

For self-paced programs, schools must report on all students who enrolled 12 months prior to the reporting period's start date until 6 months prior to the reporting period's start date. Schools must report the percentage of students graduated during the reporting period, the median time (in days) to graduation, and the percent of students graduating in two 30-day periods before and after the median days to graduation.

Auditing Outcomes Data

After releasing each year's second report, you must retain an auditor to review both of the year's reports and issue a statement attesting to their accuracy. The auditor must have a current, passing report with the AICPA peer review program, and be approved by the CIRR board. The auditor must use the list of students submitted by day 3 of class to verify the students included in the report. The audited report must be submitted to CIRR between December 1 and 31.