Standards & Implementation Requirements

Governing Outcomes Reports for 2017 Graduates
Rev. 2018-03-19

Commitments

1. Publicly release student outcomes reports for every campus and every program that is marketed as leading to a new employment outcome on a semi-annual basis under the following schedule:
   a. Graduation and placement data for all cohorts Jan 1 - June 30 will be reported by schools March 1st the following year.
   b. Graduation and placement data for all cohorts July 1 - Dec 31 will be reported by schools September 1st the following year.
2. Obtain annual, third-party verification of the documentation and reporting. The first verified report should be released within 12 months of a school’s first CIRR report.
3. Follow the CIRR Truth in Advertising policies.

Standards

See the example CIRR report for the report format. Outcomes must be calculated and reports must be generated using the CIRR Outcomes Report Template spreadsheet.

Reporting Period

Each report must cover graduates from either 1/1-6/30 or 7/1-12/31 of the chosen year.

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. They must report the graduation rate by dividing the total number of graduates from the dataset by the total amount of enrollments from the dataset, and report the time to graduate as a table by dividing the number of graduates in 6 30-day periods by the total number of students in the report.
Enrolled Students

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) should only be counted using earliest start date.

Graduates

Graduates are all students who received a certificate of completion, or who meet the policies listed in Section II of the school’s report. For all cohorts, beginning with the first cohort following the school’s first CIRR report, the school must clearly publish its requirements for a certificate of completion, and include them as part of their enrollment agreement with students.

Graduation Rate

Graduation rates are calculated from the students who originally enroll in a cohort. The on-time graduation rate is the percent of those students who graduate within the course length. The 150% of program length graduate rate is the percent of those students who graduate within 150% of the course length. If a student transfers to a later cohort, they are only counted in the graduation rate for their first cohort, and not for the later one.

Employment Outcomes

For each student who graduated, consider the below list of outcome codes from top to bottom. If documentary evidence is available to assign that code, according to the Required Documentation below, the student is assigned the corresponding outcome code. If documentation is not available and cannot be collected, or if documentary evidence does not meet the requirements, move to the next assertion in the table. (This may produce counterintuitive results. For instance, if a staff member recalls a student getting a paid, in-field job -- “1A” outcome code -- but no qualifying documentation can be found or gathered, they may be classified as “4”.)

The order of the steps is intentional, and reflects the CIRR standard. Students who accept a full-time offer after doing some contract work should be reported as 1A and not 2B. By
following the steps in order, the report will reflect that outcome, because 1A comes before 2B in this table. (For the avoidance of doubt: 1C is above 1A in the below table, because any qualifying offer from the school should be reported as such, not as a general full-time hire. 3A is last on the list because it is the default, and should not be assigned if documentation supports another code.)

Schools must account for 100% of their graduates under the following categories.

<table>
<thead>
<tr>
<th>Outcome Codes</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Step</strong></td>
</tr>
<tr>
<td>1</td>
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<tr>
<td>2</td>
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<tr>
<td>3</td>
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<td>10</td>
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</tbody>
</table>

“No documentation required” (3A) -- Any graduate may be classified as “Still seeking a job”, with no further documentation. This is the default categorization for all job seekers when no other outcome code can be supported by required documentation.

“Graduate Attestation” (2A) -- Graduate states, in writing, 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.

“Graduate Attestation” (3B) -- Graduate states, in writing, 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.)

“Outreach Records” (4) -- Documents establishing that the school attempted to contact the student a minimum of four (4) times through two (2) different means of communication, and the student never responded. This documentation shall include the dates of the attempted contacts and the student’s contact information used in those attempts.

“Qualifying Accepted Offer” (1A-C, 2B-D) -- Must meet the following common requirements (for all outcome codes) as well as the specific requirements for each outcome code. Use common sense to distinguish between offers from the school and offers that are not from the school.

Common requirements: A Qualifying Accepted Offer is any of (1) a written record from the graduate; (2) a written offer letter or contract, either signed or with oral confirmation that the offer was accepted; or (3) confirmation from an employer, third-party recruiter, or legal, credentialed third-party employment history service together with the name and job title of the point of contact. Any such document must also meet these criteria:

- States either the offer date or start date. (If both are available, use the earlier to compute placement data.)
- States that the offer is paid. (For the avoidance of doubt: exact payment rate is not required to establish a Qualifying Accepted Offer. Unpaid offers do not qualify as offers, and should be reported under a different outcome code.)
  - Indicates that the offer was accepted
  - Any information sourced verbally must meet the requirements listed in Section 3.3.

(For the avoidance of doubt: a school may source information from LinkedIn or other informal sources, but it must get confirmation by a student or employer -- per 1, 2, or 3 above -- or assign an alternate outcome code. CIRR has specifically decided not to allow LinkedIn as a sole source of documentation.)

Specific requirements: Qualifying Accepted Offers differ in three ways: in-field vs. not-in-field, full-time vs. part-time, and long/medium/short-term. An offer is assumed to be not-in-field, part-time, and short-term unless the below criteria are met.

- In-field: Either of the below.
  - Graduate attests that “the job requires the skills for which the student was trained at the school”.
  - The document states a job title that would fall under an in-field classification used by Bureau of Labor Statistics SOC codes. School must have published those SOC codes in its catalogue in advance of the student’s enrollment,
unless this report covers a period before school’s first CIRR report was published.

- Full-time: The document indicates that the job is full-time, or at least 32 hours per week.
- Term: For “long-term”, the document indicates that the offer or contract is permanent, at-will, or greater than six months in duration. For “medium-term”, the document states that the offer or contract is at least three months in duration. (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, would count as “medium-term”, until/unless a permanent offer was eventually documented.)

The below table specifies the specific requirements for each documentation code.

<table>
<thead>
<tr>
<th>Code</th>
<th>Outcome</th>
<th>Specific Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>In-field?</td>
<td>Full-time?</td>
</tr>
<tr>
<td>1A</td>
<td>Full-time employee</td>
<td>Yes</td>
</tr>
<tr>
<td>1B</td>
<td>Full-time apprenticeship, internship, or contract position</td>
<td>Yes</td>
</tr>
<tr>
<td>1C</td>
<td>Hired full-time by school in-field</td>
<td>Yes</td>
</tr>
<tr>
<td>2B</td>
<td>Short-term contract or part-time position</td>
<td>Yes</td>
</tr>
<tr>
<td>2C</td>
<td>Hired by school out of field, part-time, and/or short-term</td>
<td>Not req’d</td>
</tr>
<tr>
<td>2D</td>
<td>Out of field</td>
<td>Not req’d</td>
</tr>
</tbody>
</table>

All required documentation used for this report shall be stored electronically in a manner that allows them to be inspected within two (2) business days of request by an authorized party. The records shall be kept for a period of five (5) years after the student’s date of enrollment.

Unless otherwise specified, documentation as required under these standards may be obtained in-person, on the telephone, in writing, or through other electronic means. For information obtained in writing or through other electronic means, the records must contain a digital record of the information.

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.

**Salary Ranges**

All salary information must follow these guidelines:

- Salary includes only base compensation. It excludes bonuses, equity, relocation, and any other non-base compensation.
- If a student has held multiple positions during the period between the certificate of completion and the point of inquiry, the school shall use the salary of the position used to determine the student’s inclusion in the “Employed in Paid, In-Field Position” Job Attainment Rate for purposes of reporting on salary outcomes.
- If salary information is known, it must be included. If it is not known, select “Not provided”.
- Salaries must be reported on an annualized basis. If a salary is provided on another basis, convert it using the chart below:

<table>
<thead>
<tr>
<th>Role is:</th>
<th>Rate is:</th>
<th>Calculation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Full-time</td>
<td>Annual salary</td>
<td>Annual rate</td>
</tr>
<tr>
<td></td>
<td>Hourly</td>
<td>Hourly wage multiplied by 2080</td>
</tr>
<tr>
<td>Full-time or Part-time</td>
<td>Monthly</td>
<td>Monthly rate multiplied by 12</td>
</tr>
<tr>
<td></td>
<td>Project-based</td>
<td>Total contract value, divided by project length in hours*, multiplied by 2080</td>
</tr>
<tr>
<td>Part-time</td>
<td>Hourly</td>
<td>Hourly wage multiplied by hours-per-week multiplied by 52</td>
</tr>
<tr>
<td></td>
<td>Weekly</td>
<td>Weekly rate</td>
</tr>
</tbody>
</table>

* For purposes of determining the hourly rate, it shall be assumed that 1 day of work equals 8 hours, 1 week of work equals 40 hours, and 1 month of work equals 160 hours. Hourly rates must be rounded to the nearest cent, counting one-half cent and over as the next higher cent.
Job Titles

CIRR reports must include the five most frequent job titles and the percentage of employed graduates with these titles.

Computer Science Degrees

Schools must collect whether students held any computer science degree at time of enrollment / on student applications and retain documentation. This may be self-reported information provided by the student and need not be independently verified by the school or any third-party verifying a CIRR report. If a report covers a period before school’s first CIRR report was published and it did not collect prior degree information, it may exclude this section from the report.

Truth in Advertising

Records for each advertisement or public communication that uses outcomes statistics must be kept for 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 Full-Time in Paid, In-Field Positions.

After the release of school’s first cohort report under these 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 represented by those graduates whose salaries were included in the advertisement. 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 total graduation rate as calculated and reported under CIRR standards.

Ensuring Access to CIRR Reports

Any advertisement or marketing material must either:

- Include a copy of the CIRR report, exactly as it appears on cirr.org.
- Link directly to the CIRR report, on cirr.org or exactly as it appears on cirr.org.
- Link to a webpage that includes a link to the CIRR report, on cirr.org or exactly as it appears on cirr.org.

For avoidance of doubt, schools must include a link to their CIRR report either on their website homepage, or on a page linked to from their homepage.