



U.S. Department of Education
Office of Inspector General

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

September 4, 2025
ED-OIG/I24IL0210

INSPECTION REPORT

NOTICE

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report, represent the opinions of the Office of Inspector General. The appropriate Department of Education officials will determine what corrective actions should be taken.

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UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

Audit Services

September 4, 2025

Dr. Clyne G. H. Namuo
President
Joliet Junior College
1215 Houbolt Road
Joliet, IL 60431

Dear Dr. Namuo:

Enclosed is our final report, "Quality of Data Reported through the Department's Integrated Postsecondary Education Data System Surveys by Joliet Junior College," Control Number ED-OIG/I24IL0210. This report incorporates the comments you provided in response to the draft report. 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.

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Acting Chief Operating Officer for Federal Student Aid
U.S. Department of Education
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Matthew Soldner
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U.S. Department of Education
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We appreciate your cooperation during this inspection. If you have any questions, please contact Gregory Bernert, Assistant Director, Higher Education Oversight Team, at Gregory.Bernert@ed.gov or (312) 213-1890 or me at Jeffrey.Nekrasz@ed.gov.

Sincerely,

/s/

Jeffrey Nekrasz
Acting Director
Higher Education Oversight Team

Enclosure

Results in Brief

Quality of Data Reported through the Department's Integrated Postsecondary Education Data System Surveys by Joliet Junior 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 and 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 Joliet Junior College (JJC) reported verifiable data to IPEDS for the 2021–2022 reporting period.

What Did the OIG Find?

JJC did not always report verifiable data to IPEDS for the 2021–2022 reporting period. The total amount of grant and scholarship aid that JJC students received for the 2021–2022 reporting period and the number of full-time undergraduate students who were enrolled in the fall of 2021 and seeking their first postsecondary certificate or degree that the school reported to IPEDS were not verifiable. ([Finding 1](#)). In addition, the number of students who were full-time undergraduate students who began attending the school during academic year 2019–2020, were seeking their first postsecondary certificate or degree, and completed their program of study by the end of academic year 2021–2022 (150 percent of the normal time) that JJC reported to IPEDS were not verifiable. ([Finding 2](#)). While not all reported financial aid and program completion data were verifiable, the average tuition and fees, books and supplies, room and board, and other expenses charged to full-time undergraduate students who were seeking their first certificate or degree that the school reported to IPEDS for the 2021–2022 reporting period were verifiable. ([Finding 3](#)). JJC did not always report verifiable data to IPEDS because it did not update and implement procedures for collecting, consolidating, assessing the reliability of, and reporting data to IPEDS.

What Is the Impact?

The total amount of grant and scholarship aid that JJC reported to IPEDS was used to calculate the school's net price (the average yearly price charged to full-time undergraduate students who are seeking their first postsecondary certificate or degree). The number of students that the school reported to IPEDS was used to calculate the school's overall graduation rate. Because the data that JJC reported to IPEDS were not always verifiable, its published net price and graduation rate for the 2021–2022 reporting period were unreliable. Prospective students and their parents might have made enrollment decisions based on this unreliable information.

What Are the Next Steps?

We made four recommendations to strengthen JJC's policies and procedures for collecting, consolidating, assessing the reliability of, and reporting data to IPEDS. We provided a draft of this report to JJC for comment. In its comments on the draft of this report, JJC described actions that it has already taken to address them (see [JJC's Comments](#)).

We summarize JJC's comments and provide our responses after each finding and provide the full text of the comments at the end of the report.

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Introduction

Background

Joliet Junior College (JJC) is a 2-year public postsecondary school in Joliet, Illinois. It has five campuses and education centers located in the south Chicago suburbs and is accredited by the Higher Learning Commission.

JJC offers more than 180 associate degree and certificate programs, both in person and online, in nine academic pathways: agricultural sciences and veterinary technology; architecture, manufacturing, and automotive; business, finance and information technology; culinary, hospitality, and tourism; health, public safety, and human services; liberal and fine arts; social and behavioral sciences; science, technology, engineering, and math; and workforce and training. During award year 2021–2022 (July 1, 2021, through June 30, 2022), about 11,500 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, JJC participated in four Title IV programs—the Federal Pell 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, JJC disbursed about \$13 million in Title IV funds to about 3,000 students. It also disbursed about \$287,000 in Higher Education Emergency Relief Fund (HEERF)² grants to 235 students in Group 3 of the Student Financial Aid (SFA) Survey.³

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

² HEERF is one of multiple Federal emergency relief funds authorized and funded by the Coronavirus Aid, Relief, and Economic Security Act; the Coronavirus Response and Relief Supplemental Appropriations Act; and the American Rescue Plan.

³ 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, State, or local government or the school.

Integrated Postsecondary Education Data System, 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). Among other responsibilities, it is responsible for collecting, analyzing, and reporting education statistics. NCES collects data through a set of 12 annual surveys, including the 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 estimate the average net price for Group 3 students. Section 132(a)(3) of the HEA defines 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, net price is the school's cost of attendance less the average amount of financial aid (excluding HEERF grants) that Group 3 students received from Federal, State, and local governments 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 the data from the Graduate Rates survey 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: 2022–23" 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 [College Scorecard](#), [College Navigator](#), and [IPEDS Data Center](#).

- The College Scorecard is a search tool designed to provide transparency and consumer information relevant to postsecondary schools. It brings together 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: 2022–23” 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.

Finding 1. JJC Did Not Report Verifiable Data to IPEDS through the SFA Survey for the 2021–2022 Reporting Period

According to the Committee of Sponsoring Organizations of the Treadway Commission’s (COSO) “Internal Control—Integrated Framework” (Integrated Framework),⁴ the quality of information depends on whether the data has certain attributes, including verifiability, accuracy, and correctness. JJC did not correctly report the total annual financial aid awarded to its undergraduate students by Federal, State and local governments and the school. It also did not accurately count and report the number of full-time undergraduate students who were enrolled in the fall of 2021 and seeking their first postsecondary certificate or degree. As a result, the school’s net price of \$4,440 calculated for the 2021–2022 reporting period was not reliable. Prospective students and their parents might have made enrollment decisions based on this unreliable information.

Incorrect Reporting of the Amount of Financial Aid That Students Received

To assess whether JJC reported verifiable data through the SFA survey for the 2021–2022 reporting period, we selected a statistical sample of 61 students from the population of 248 full-time (12 or more credit hours) undergraduate students who were enrolled in the fall of 2021 and seeking their first postsecondary undergraduate certificate or degree (see [Sampling Methodology](#)). We reviewed JJC’s records for 10 of the 61 students and found that the data for all 10 were not verifiable. For the 10 students that we reviewed, the school incorrectly included a total of \$9,833 in HEERF aid that it disbursed to 9 students and \$8,482 in scholarship aid awarded to 3 students who had prior postsecondary education experience or did not enroll as a full-time student⁵ during their first academic period (see [Inaccurate Counting of Full-time Undergraduate Students Seeking their First Postsecondary Certificate or Degree](#)). In addition, the school duplicated a total of \$3,750 in institutional aid for 3 of the 10 students. Therefore, JJC overstated the total amount of aid received from the Federal government, State government, or the school. Because the data reported for 10 (16 percent) of the

⁴ The Integrated Framework is a widely accepted framework of internal control that focuses on the needs of the private sector. It contains five components of internal control—control environment, risk assessment, control activities, information and communication, and monitoring—and the underlying principles of each component.

⁵ A full-time undergraduate student is someone enrolled in 12 or more semester credits per term.

61 students included in our sample were not verifiable (that is, they were not accurate), the accuracy of our sample results did not meet the 95 percent accuracy level; therefore, we did not review the school's records for the other 51 students included in our sample.

According to the instructions included in the IPEDS survey materials for the 2021–2022 reporting period, emergency grants funded under the Coronavirus Aid, Relief, and Economic Security Act; the Coronavirus Response and Relief Supplemental Appropriations Act; and the American Rescue Plan **should NOT be included** for Group 3 students in Part D under “Report the total amount of grant or scholarship aid from the federal government, state/local government, or the institution awarded to Group 3 students” (total amount of financial aid) because including these grants would skew net price calculations.

According to JJC's Director of Institutional Research and Effectiveness, JJC's policies and procedures for IPEDS reporting did not separate or exclude HEERF grant funding from the total amount of financial aid. In addition, JJC officials explained that a programmatic error in the creation of its backup file caused school grants to be counted twice in the school's reported amounts. According to school officials, JJC is revising its policies and procedures to include a reconciliation process to avoid duplicate reporting of State and institutional aid.

Inaccurate Counting of Full-time Undergraduate Students Seeking their First Postsecondary Certificate or Degree

JJC incorrectly counted 3 of the 10 students we reviewed in the count of full-time undergraduate students seeking their first postsecondary certificate or degree. All three students had prior postsecondary education experience, and one of the three students was also not enrolled as a full-time student during their first academic period at JJC. The school's application spreadsheet, which serves as an internal record of student applications submitted, contains information provided directly by students during the application process. This spreadsheet included the prior postsecondary colleges or universities attended by the three students, confirming their previous postsecondary school enrollment. We also confirmed through the Department's National Student Loan Data System that these three students had prior postsecondary education experience. Therefore, JJC should not have included these students in its count of full-time undergraduate students seeking their first postsecondary certificate or degree.

Also, the backup data file that JJC provided to us as support for the data it reported through the SFA survey for the 2021–2022 reporting period incorrectly included two students who only received HEERF aid in its count of Group 3 students included in Part D under total amount of financial aid. The IPEDS survey materials for the 2021–2022

reporting period state that HEERF grants should be considered Federal aid but not Title IV aid for IPEDS reporting purposes. Therefore, students who only received HEERF aid should not have been included in the count of Group 3 students included in Part D under total amount of financial aid.

JJC inaccurately counted students who were seeking their first postsecondary certificate or degree because it did not implement control activities to ensure that admissions data were considered during IPEDS reporting. Although the application spreadsheet listed the students' prior postsecondary institutions and the student system reflected transferred credits, JJC did not incorporate this information into the cohort creation for the 2019–2020 academic year. According to JJC officials, the school's transition from an on-premises information system to a cloud-based system caused compatibility issues with admissions files. As a result, JJC could not verify the student's prior postsecondary education history in the information system before the IPEDS data were reported. Thus, the report generated from the student information system misclassified these students as first-time postsecondary students despite their previous college experience. JJC's Director of Institutional Research and Effectiveness confirmed that there are no ongoing compatibility issues and no anticipated impact on future IPEDS reporting. JJC will use the admissions records to ensure accurate student categorization in future IPEDS submissions.

A postsecondary school participating in Title IV programs must complete IPEDS surveys to the satisfaction of the Secretary (section 487(a)(17) of the HEA). Additionally, a school must demonstrate that it has the administrative capability to meet the statutory and regulatory requirements of Title IV programs (Title 34 Code of Federal Regulations (C.F.R.) section 668.16(a)). As such, a school must administer Title IV programs with adequate checks and balances in its system of internal control (34 C.F.R. section 668.16(c)(1)). It also must maintain all required records (34 C.F.R. section 668.16(d)(1)).

Principle 12 of the Integrated Framework states that an organization's management should implement control activities through policies establishing what is expected and relevant procedures specifying actions. JJC's incorrect reporting of the amount of financial aid that students received and inaccurate counting of full-time undergraduate students seeking their first postsecondary certificate or degree happened because the school did not update and implement procedures for collecting, consolidating, assessing the reliability of, and reporting data to IPEDS.

Potential Effect of Incorrectly Reporting Data through the IPEDS SFA Survey

Our review of the backup data file that JJC provided to us in support of the SFA survey for the 2021–2022 reporting period disclosed that JJC incorrectly reported a total of

\$286,781 in HEERF grants awarded to 235 Group 3 students included in Part D under total amount of financial aid. Our review also disclosed that JJC incorrectly duplicated \$95,894 in aid the school provided to 42 students. Based on these two errors, JJC overstated the total amount of financial aid received from the Federal, State, or local government, or the school by \$382,675 (33 percent of the \$1,167,680 JJC reported).

Because JJC incorrectly reported data through the SFA survey, its net price of \$4,440 calculated for the 2021–2022 reporting period was unreliable. Prospective students and their parents might have made enrollment decisions based on this unreliable information.

Recommendations

We recommend that the Chief Operating Officer for Federal Student Aid (FSA), in conjunction with the Commissioner of NCES, require JJC to—

- 1.1 Update its existing policies and procedures for collecting, verifying, and reporting accurate data for the SFA survey consistent with the IPEDS Keyholder Handbook and survey instructions.
- 1.2 Design and implement procedures for ensuring that employees consider admission records to record and update the accurate classification of first-time, full-time undergraduate students in the student information system before finalizing the cohort.

We also recommend that the Chief Operating Officer for FSA—

- 1.3 Consider taking appropriate action pursuant to subpart G of 34 C.F.R. section 668 because the school reported inaccurate and incorrect information to IPEDS through the SFA survey for the 2021–2022 reporting period.⁶

⁶ Subpart G describes the actions that the Department may take against schools that violate any statutory provision of or applicable to Title IV programs. According to the “New Keyholder Handbook for the IPEDS Data Collection: 2022–23”, each year, Federal Student Aid issues fine notices or warning letters to schools for not complying with requirements related to the submission of IPEDS surveys.

JJC Comments

JJC agreed with the finding. JJC described the corrective actions that it has taken and plans to take to address the recommendations.

For Recommendation 1.1, JJC stated that it has revised its policies and procedures to ensure strict compliance with IPEDS reporting requirements. JJC also stated that it implemented a reconciliation and quality control process to avoid duplication of State and Institutional aid and separate HEERF aid from other Federal grants as required.

For Recommendation 1.2, JJC stated that it has instituted a quality control process that includes cross-referencing admission, transfer credit, and financial aid records before finalizing the cohort. JJC is implementing a new Student Information System to cross-reference the data to ensure accurate student characteristics for the cohort. JJC also stated that staff involved in IPEDS reporting are required to annually review the current New Keyholder Handbook and other relevant guidelines on IPEDS requirements, including the criteria for identifying first-time, full-time undergraduate students.

OIG Response

We did not make any changes to the finding or recommendations based on JJC's comments. The corrective actions that the school described, if implemented as described, are responsive to the recommendations.

Finding 2. JJC Did Not Report Verifiable Data to IPEDS through the Graduation Rates Survey for the 2021–2022 Reporting Period

According to the Integrated Framework, the quality of information depends on whether the data has certain attributes, including verifiability, accuracy, and correctness. JJC inaccurately reported the number of students who were full-time undergraduate students who began attending the school during academic year 2019–2020 and were seeking their first postsecondary certificate or degree. Because JJC inaccurately reported the number of such students, its overall graduation rate calculated for the 2021–2022 reporting period was not reliable. The unreliable graduation rate might have resulted in prospective students and their parents making enrollment decisions based on unreliable graduation rate data.

Inaccurate Counting of Students Who Began Attending during Academic Year 2019–2020 and Were Seeking their First Postsecondary Certificate or Degree

To assess whether JJC reported verifiable data to IPEDS through the Graduation Rates survey for the 2021–2022 reporting period, we selected a statistical sample of 49 students from the population of 158 full-time undergraduate students who began attending the school during academic year 2019–2020 and were seeking their first postsecondary certificate or degree (see [Sampling Methodology](#)). We reviewed the school’s records for all 49 students and found that the data for 4 of them were not verifiable.

According to the IPEDS glossary for the Graduation Rates survey, an undergraduate full-time student seeking their first postsecondary certificate or degree is a student who has no prior postsecondary education experience attending any school for the first time at the undergraduate level. For 4 of the 49 students included in our sample that JJC counted as reported as full-time undergraduate students seeking their first postsecondary certificate or degree, the school’s admission records showed that those 4 students had prior postsecondary education experience. Because we found that the data reported for 4 (8 percent) of the 49 students included in our sample were not verifiable (that is, they were inaccurate), the accuracy level of our sample results did not meet the 95 percent confidence level.

A postsecondary school participating in Title IV programs must complete IPEDS surveys to the satisfaction of the Secretary (section 487(a)(17) of the HEA). The school must annually prepare the graduation rate of its full-time undergraduate students seeking their first postsecondary certificate or degree (34 C.F.R. section 668.45) and provide prospective and enrolled students with information about the graduation rate

(section 485(a)(1)(L) of the HEA). Additionally, a school must demonstrate that it has the administrative capability to meet the statutory and regulatory requirements of the Title IV programs (34 C.F.R. section 668.16(a)). As such, a school must administer Title IV programs with adequate checks and balances in its system of internal control (34 C.F.R. section 668.16(c)(1)). It also must maintain all required records (34 C.F.R. section 668.16(d)(1)).

According to Principle 12 of the Integrated Framework, an organization's management should implement control activities through policies establishing what is expected and relevant procedures specifying actions. JJC reported unverifiable data through the Graduation Rates survey for the 2021–2022 reporting period because it did not update and implement procedures for collecting, consolidating, assessing the reliability of, and reporting data to IPEDS. Additionally, it inaccurately counted students who were seeking their first postsecondary certificate or degree because it did not implement control activities to ensure that admissions data were considered during IPEDS reporting. Although the school's application spreadsheet listed the students' prior postsecondary institutions and the student system reflected transferred credits, JJC did not incorporate this information into the cohort creation for the 2019–2020 academic year. According to JJC officials, the school's transition from an on-premises information system to a cloud-based system caused compatibility issues with admissions files. As a result, JJC could not verify the student's prior postsecondary education history in the information system before the IPEDS data were reported. Thus, the report generated from the student information system misclassified these students as first-time postsecondary students despite their previous college experience. JJC's Director of Institutional Research and Effectiveness confirmed that there are no ongoing compatibility issues and no anticipated impact on future IPEDS reporting. JJC will use admissions records to ensure accurate student categorization in future IPEDS submissions.

The Department calculates graduation rates by dividing the total number of students who received a certificate, degree, diploma, or other recognized postsecondary education credential within 150 percent of the normal time for graduation by the number of students in the applicable cohort.⁷ Because JJC inaccurately counted the total number of students who were seeking their first postsecondary certificate or degree, its overall graduation rate calculated for the 2021–2022 reporting period was unreliable.

⁷ The cohort applicable to the 2021–2022 reporting period included students enrolled in 2-year programs who began attending JJC during the fall (between late August and November 1) of academic year 2019–2020.

The reporting of unverifiable data might have resulted in prospective students making enrollment decisions based on the unreliable graduation rate.

Recommendations

We recommend that the Chief Operating Officer for FSA, in conjunction with the Commissioner of NCES, require JJC to—

- 2.1 Update and implement policies and procedures for collecting, verifying, and reporting accurate data for the Graduation Rates survey to align with current IPEDS reporting requirements and ensure the accurate classification of first-time, full-time undergraduate students.
- 2.2 Design and implement procedures for ensuring that employees consider admission records to record and update the accurate classification of first-time, full-time undergraduate students in the student information system before finalizing the cohort.

JJC Comments

JJC agreed with the finding. JJC described the corrective actions that it has taken and plans to take to address the recommendations.

For Recommendation 2.1, JJC stated that its policies and procedures for collecting and reporting reflect the standards outlined in the New Keyholder Handbook and other guidance.

For Recommendation 2.2, JJC stated that it has instituted a quality control process that includes cross-referencing admission, transfer credit, and financial aid records before finalizing the cohort. JJC is implementing a new Student Information System to cross-reference the data to ensure accurate student characteristics for the cohort. JJC also stated that staff involved in IPEDS reporting are required to annually review the current New Keyholder Handbook and other relevant guidelines on IPEDS requirements, including the criteria for identifying first-time, full-time undergraduate students.

OIG Response

We did not make any changes to the finding or recommendations based on JJC's comments. The corrective actions that the school described, if implemented as described, are responsive to the recommendations.

Finding 3. JJC Reported Verifiable Data to IPEDS through the Institutional Characteristics Survey for the 2021–2022 Reporting Period

According to the Integrated Framework, the quality of information depends on whether the data has certain attributes, including verifiability, accuracy, and correctness. We traced the average amount of tuition and fees that JJC reported through the Institutional Characteristics survey to the school's records, including its annual disclosure for academic year 2021–2022. We also recalculated the average tuition and fees and the cost of books and supplies using a backup data file that the school provided as support for the data it reported to IPEDS. In addition, we verified that the average room and board and other expenses that the school reported in the Institutional Characteristics survey matched the amounts in the school's supporting documentation.

We found that JJC reported through the Institutional Characteristics survey for the 2021–2022 reporting period verifiable average tuition and fees, books and supplies, room and board, and other expenses that it charged to full-time undergraduate students who were seeking their first certificate or degree.

JJC Comments

JJC agreed with the finding.

Appendix A. Scope and Methodology

Our inspection covered selected data elements and variables that JJC 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 in November 2024. 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 C.F.R. sections 668.14(b)(19), 668.16(c)(1) and (d)(1), and 668.45;
- NCES’ “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 “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 JJC’s website, annual compliance reports, and annual financial statement audit reports; records that school officials provided to us (see [Analysis Techniques](#)); and the Higher Learning Commission’s website. Additionally, we interviewed JJC officials and reviewed the completed surveys that school officials provided to us.

Sampling Methodology

We used acceptance sampling to achieve our objective. We first obtained from JJC officials the population of 248 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. We also obtained from JJC officials the population of 158 students who were full-time undergraduate students, began attending the school during academic year 2019–2020, 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 two random statistical samples. One sample consisted of 61 of the 248 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. The other sample consisted of 49 of the 158 students who were full-time undergraduate students, began attending the school during academic year 2019–2020, 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 selected both samples using an expected error rate of zero. This sample design allowed for acceptance or rejection of the verifiability of the data for the population at a 95 percent confidence level. If the data were not verifiable for three or more of the students selected in each sample, then the data for the entire respective population would not be verifiable because the accuracy of the data for the sample did not meet the tolerance rate of 95 percent.

Analysis Techniques

We evaluated the verifiability of the final data elements that JJC reported through the Student Financial Aid, Graduation Rates, and Institutional Characteristics 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.

SFA Survey

We reviewed the school’s records for 10 of the 61 students in our sample. To determine whether the school accurately categorized these students as full-time undergraduate students who were enrolled in the fall of 2021 and seeking their first postsecondary certificate or degree, we reviewed the backup data file that JJC provided as support. We traced relevant data, such as the student’s enrollment date and number of credit hours attempted, to the 10 students’ official transcripts. We concluded that JJC accurately categorized the students if its records showed that they were full-time undergraduate students who enrolled in the fall of 2021, were seeking their first postsecondary certificate or degree, and received financial aid from Federal, State or local governments or the school during academic year 2021–2022.

To determine whether JJC reported the correct amount of total annual financial aid awarded to full-time undergraduate students by Federal, State, or local governments or the school, we reviewed the backup data file that the school provided as support. For 10 of the students included in our sample, we traced the total amount of financial aid reported in the SFA survey to the school’s financial assistance records. We concluded that JJC reported the correct total amount of financial aid if the amount recorded in the school’s records matched the amount reported through the SFA survey for the 2021–2022 reporting period.

Graduation Rates Survey

We reviewed the school's records for all 49 students included in our sample. To determine whether the school accurately categorized the four students, we reviewed the backup data file that JJC provided as support. We traced relevant data elements in the backup data file (students' enrollment dates, academic programs, number of credit hours attempted, graduation dates, and prior postsecondary education experiences) to the 49 students' official transcripts. We concluded that JJC 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 2-year program), was a full-time undergraduate student who began attending the school during academic year 2019–2020, and had not previously sought a postsecondary education credential.

Institutional Characteristics Survey

To determine whether JJC reported verifiable cost of attendance data, we traced the amounts reported through the survey to the school's records, such as its annual disclosure of tuition and fees for academic year 2021–2022. To determine whether the school reported the correct average cost of books and supplies, we recalculated the averages using the backup data file that JJC provided as support. In addition, we verified that the average room and board and other expenses that the school reported in the Institutional Characteristics survey matched the amounts in the school's student budget record. We concluded that JJC reported verifiable cost of attendance data if its records and other documentation supported the averages reported through the Institutional Characteristics survey for the 2021–2022 reporting period.

Use of Computer-Processed Data

We relied, in part, on computer-processed data from JJC'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 JJC's student information system.

We also obtained data from FSA's Data Center and the National Student Loan Data System. We used that data to identify the amount of Title IV funds disbursed by JJC during award year 2021–2022 and to determine whether students had prior postsecondary education experience. Because we considered it to be the best available data for the purposes of our inspection, we did not assess the reliability of the data.

Compliance with Standards

We conducted our work in accordance with the Council of the Inspectors General on Integrity and Efficiency (CIGIE) “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 at JJC and our offices from November 2024 through April 2025. We provided a draft of this report to JJC officials for comment on June 16, 2025, and received their comments on July 2, 2025.

Appendix B. Acronyms and Abbreviations

C.F.R.	Code of Federal Regulations
COSO	Committee of Sponsoring Organizations of the Treadway Commission
Department	U.S. Department of Education
FSA	Federal Student Aid
HEA	Higher Education Act of 1965, as amended
HEERF	Higher Education Emergency Relief Fund
Integrated Framework	COSO's Internal Control—Integrated Framework
IPEDS	Integrated Postsecondary Education Data System
JJC	Joliet Junior College
NCES	National Center for Education Statistics
SFA	Student Financial Aid
total amount of financial aid	total amount of grant or scholarship aid from the federal government, state/local government, or the institution awarded to Group 3 students

JJC's Comments



June 30, 2025

Gregory G. Bernert
Assistant Director, Higher Education Oversight Team
Office of Inspector General
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202-1510

Dear Assistant Director Bernert:

Joliet Junior College (JJC) appreciates the opportunity to respond to the findings outlined in the draft inspection report "Quality of Data Reported through the Department's Integrated Postsecondary Education Data System Surveys by Joliet Junior College" Control Number ED-OIG/I24IL0210.

JJC is committed to full compliance with Title 34 CFR Part 668 and cooperating fully with the Chief Operating Officer for Federal Student Aid and the Commissioner of the National Center for Education Statistics on recommendations.

Finding 1. and 2. Unverifiable Financial Aid and Graduation Rate Data: JJC agrees with both findings and acknowledges the total amount of grant and scholarship aid reported and the number of full-time, first-time undergraduate students enrolled in Fall 2021 cohort and the 150% graduation rate cohort were not verifiable during the inspection.

Finding 3. Verifiable Cost of Attendance Data: JJC agrees with Finding 3 and appreciates the acknowledgment that our reported data on tuition, fees, books, supplies, and other expenses were verifiable.

JJC recognizes the importance of accurate IPEDS data and has taken the following corrective actions to ensure confidence in our reporting:

- (1.1) *Recommendation: Update policies and procedures for collecting, verifying, and reporting accurate data for the SFA survey consistent with the IPEDS Keyholder Handbook and survey instructions.*

JJC has revised policy and procedures to ensure strict compliance with IPEDS reporting requirements. JJC has a reconciliation/quality control process to avoid duplication of State and institutional aid reporting. The process separates HEERF aid from other federal grants, as required by IPEDS. HEERF grants expired on June 30, 2023, and reporting has concluded.

- (2.1) *Recommendation: Update policies and procedures for collecting, verifying, and reporting accurate data for the Graduation Rates survey to align with current IPEDS*

reporting requirements and ensure the accurate classification of first-time, full-time students.

The JJC policy and procedures for collecting and reporting student data reflect the standards outlined in the *New Keyholder Handbook for the IPEDS Data Collection* and other relevant guidance. Student cohort data will be saved at the time of reporting to ensure it is available for review after submission.

- (1.2 & 2.2) *Recommendations: ...design and implement procedures to ensure employees consider admissions records are used to record and update the accurate classification of first-time, full-time students in the student information system before finalizing the cohort.*

JJC has instituted a quality control process that includes cross-referencing records with admissions, transfer credit, and financial aid before finalizing the cohort for SFA and Graduation Rate surveys to verify data accuracy before submission. With the implementation of a new Student Information System (2026 January-June), programming will be used for cross-referencing the data to ensure accurate student characteristics for the cohort.

- Institutional Research staff members involved in IPEDS reporting are required to annually review the current *New Keyholder Handbook* and other relevant guidance on IPEDS requirements, including the criteria for identifying first-time, full-time undergraduate students.

JJC recognizes the importance of providing accurate and reliable data to the Department and to prospective students and their parents making enrollment decisions. We deeply regret any confusion that the reporting issues may have caused. We are confident that the actions identified above will prevent future problems.

Sincerely,

[Redacted Signature]

Clyne G. H. Namuo, Ph.D.

President

Joliet Junior College

(he/him/his)

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Joliet Junior College inspires learning, strengthens communities, and transforms lives.