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Ethical Reflections on Career Outcomes Data

Challenges and Solutions

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Abstract: In higher education's competitive landscape, driven by rankings, enrollment targets, and demands for return on investment (ROI) of degrees, career outcomes data is seen as a panacea. However, ethical considerations are conspicuously absent from the myriad discussions on career outcomes data collection. Critical issues such as student privacy, data security, accuracy, reliability, and transparency persist. This paper explores the ethical dimensions of career outcomes data collection and reporting, examining current practices, identifying gaps, and proposing solutions that higher education institutions can adopt to enhance transparency, accountability, and public trust.

Keywords: career outcomes data, graduate outcomes, employment outcomes, student success, higher education, college rankings, data ethics, college return on investment, student data privacy

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Despite the extensive and well-documented evidence supporting the value of college degrees, public skepticism about the worth of higher education continues to persist (Alonso, 2023; Kelderman, 2023; Palmer, 2024). With fluctuating student enrollments and reduced public funding, higher education institutions are now in a fiercely competitive market (Bauld, 2023; Blake, 2023). As competition intensifies, so does the pressure on these institutions to demonstrate the value of their degrees through career outcomes data (Blake, 2023). Historically, metrics such as employment rates, starting salaries, and industry placements informed students and the public about the benefits of a college education. However, the growing emphasis on return on investment (ROI) has transformed these metrics into powerful marketing tools (Blake, 2023). Today, the career outcomes rate is a crucial indicator, gaining prominence as accrediting organizations, rankings, and government oversight agencies incorporate it into accountability measures alongside graduation and retention rates.

The career outcomes rate, also known as placement rate, employment rate, or destination rate, represents the percentage of graduates who have successfully transitioned to post-graduation activities, such as employment or continuing education (National Association of Colleges and Employers [NACE], 2020). In contrast to graduation and retention rates, gathering and reporting career outcomes data presents significant complexities. Organizations like NACE have developed standards to bring consistency and transparency to the collection and reporting of these data. For example, NACE has standardized the outcome categories and how the career outcomes rate is calculated to ensure it can be compared from one institution to another. This rate is calculated by

dividing the number of graduates engaged in positive activities, such as employment, continuing education, serving in the military, or volunteering, by the total number of graduates for whom outcome information is available, excluding those not seeking employment or further education (NACE, 2020).

Nonetheless, the competitive dynamics of the higher education market have fostered an environment in which institutions may feel incentivized to manipulate or selectively report data, often bypassing ethical considerations (Gnolek et al., 2014; Meredith, 2004; O'Neil, 2016; Sauder & Espeland, 2009). For example, the Department of Education fined Baker College $2.5 million for inflating the salaries of its graduates. At the same time, the former dean of Temple University's Fox School of Business was sentenced to over one year in prison for falsifying data to boost the school's rankings (U.S. Department of Justice, 2021; Wethington, 2025). While national standards have positively impacted data reporting, they remain insufficient in addressing deeper issues related to consent, privacy, data accuracy, and institutional accountability. This article explores the ethical tensions inherent in collecting, reporting, and using career outcomes data, highlighting specific ethical issues in the data-gathering process. It offers short and long-term solutions for institutions seeking to collect and report career outcomes data ethically and transparently, along with suggestions for future inquiry and discussion.

National Guidelines and Transparency

Career outcomes data refers to information that tracks and describes graduates' activities after completing their education. This encompasses whether graduates are employed, pursuing further education, or engaging in other activities, along with detailed employment data such as job title, salary, employer, and industry. Despite its long-standing presence, gathering and reporting this information became more formalized only in 2014, when member institutions of the NACE agreed on specific guidelines known as the First-Destination Survey Standards and Protocols (NACE, 2020). These guidelines provided a structured approach for collecting and reporting data regarding the post-graduation career outcomes of students.

According to NACE's *First-Destination Survey Standards and Protocols* (2020), institutions gather data from both primary and secondary sources. The primary source is the First-Destination Survey, which asks graduates to complete a standardized set of questions within a specified timeframe. A sample of the data gathered and questions asked on the survey is provided in the appendix. In addition to the survey, institutions are encouraged to seek supplementary secondary data to validate and enhance their knowledge rate. Secondary sources include manual public searches of graduates via platforms like Google and LinkedIn, purchased data scrapes, and other second-hand information obtained from faculty, staff, and occasionally employers. The knowledge rate represents the percentage of graduates for whom career outcome information is available, incorporating both the survey response rate and additional data collected through secondary sources.

In addition to outlining data sources, three critical aspects of NACE's guidelines warrant attention. These include establishing uniform definitions, defined timelines for collection

and reporting, and standards for reporting student employment data, continued education, and other post-graduation activities. The guidelines provide comprehensive direction on various elements, including the composition of a graduating cohort, the categorization and definitions of employment types, the timing of graduate surveys, and the calculation of outcomes and knowledge rates. With this guidance, NACE collects member career outcomes data and produces annual reports on first-destination outcomes of undergraduate and graduate students nationwide. Tables 1 and 2 below summarize the core elements of NACE's data-gathering methods and definitions for the First-Destination Survey. Table 1 focuses on important definitions and timelines, while Table 2 focuses on key metrics and calculations used to standardize career outcomes data across institutions. It is important to note that graduates who do not respond to the survey and for whom no information can be found, also known as "no responses" are left out of the career outcomes rate calculation and, thus, out of the career outcomes conversation. Understanding who did not respond to the survey or cannot be found in secondary data sources is as important as understanding those who did.

Table 1. *First-Destination Survey Protocols*

Protocol	Description
Graduating Class	A graduating class includes those who completed their degrees between July 1 and June 30 each year.
Timing of Data Collection	The deadline for gathering data is December 31. To increase responses, NACE recommends surveying graduates before they graduate and leave the institution and up to 6 months after graduation.
Outcome Categories	The following standard outcome categories should be used in the survey and reporting. These are: ● Employed full-time ● Employed part-time ● Volunteer or service program ● U.S. Military ● Continuing education ● Seeking employment ● Seeking education but not yet enrolled ● Not seeking employment or education at this time

Note. The information in this table has been gathered and summarized from the NACE *Standards and Protocols for the Collection and Dissemination of Graduating Students Initial Career Outcomes Information for Undergraduates* (2020) and the NACE website.

Table 2. *Key First-Destination Metrics*

Metric	Definition	Calculation
Career Outcomes Rate	The percentage of graduates who have reported that they successfully transitioned to post-graduation activities and are no longer seeking an outcome. It sums the number of employed, service, military, and continuing education graduates. Please note, this equation does not include "no responses," where graduates do not respond to the survey or for whom career outcomes information cannot be found, as well as those not in the labor force and not seeking.	# Employed + # Service + # Military + # Continuing Education / # Employed + # Service + # Military + # Continuing Education + # Still Seeking
Knowledge Rate	The proportion of graduates for whom an institution has verifiable information about their first-destination outcomes, regardless of data source.	# Completed First-Destination Survey + # Secondary Source Data Collected / # Graduating Class
Response Rate	The number of graduates who responded to the first-destination survey relative to the total number of graduates surveyed.	# Completed First-Destination Survey / # Graduating Class

Note. The information in this table has been gathered and summarized from the NACE *Standards and Protocols for the Collection and Dissemination of Graduating Students Initial Career Outcomes Information for Undergraduates* (2020) and the NACE website.

While NACE's efforts have introduced a degree of standardization, they do not adequately address the deeper ethical complexities associated with collecting and disseminating career outcomes data. Although NACE guidelines promote transparency, they provide limited guidance on ethically managing conflicts between institutional interests and the need for comprehensive, representative data. When we think about career outcomes data and unethical practices, we think of the notorious business or law schools, for-profit institutions, or online school cases that have made headlines for falsifying data to boost their career outcomes for graduates and their rankings in the U.S. News and World Report (Dippie, 2022; Jaschik, 2018; Korn, 2022; Wethington, 2025). Yet, few consider the subtle ways data can be altered and manipulated.

For instance, the duration of surveying graduates and gathering secondary data directly impacts career outcomes (Makela & Hoff, 2018). The longer data is collected, the more likely graduates will report being employed or continuing education (Makela & Hoff, 2018). While NACE provides some recommendations for the timing of the career outcomes surveys, institutions are left to interpret what six months post-graduation means for them. For example, some institutions conclude data collection six months after graduation,

whereas others begin collecting data at that six-month mark. Some institutions will survey students for up to six months post-graduation, only to continue gathering secondary data for months afterward. This seemingly slight inconsistency in timing, however, creates vastly different outcomes.

Then, there is the issue of institutions choosing favorable data selectively throughout the data-gathering process. Institutions receive several data points from multiple responses to the survey plus any additional data scraping or manual online lookups for each graduate. This means that institutions can then choose which outcomes to keep. For example, a graduate who is employed at graduation will be counted as employed even if they report that their circumstances have changed in those six months. In addition, some institutions decide to survey graduates at commencement but classify any "still seeking" responses as "no response" if no updates are received within six months through additional surveying and manual lookups or data scrapes. Graduates who do not respond to the survey and for whom no data can be found are marked as no response. This is important because graduates with no responses are excluded from the positive career outcomes rate calculation, while those still seeking are included. As a result, the career outcomes rate appears artificially inflated.

These are just a few examples of practices where NACE's guidelines have not effectively guided institutions, resulting in artificially inflated career outcome rates, whether intentionally or not. Part of the problem is that NACE's guidelines allow institutions significant discretion in collecting, reporting, and interpreting these data. Additionally, these guidelines remain largely voluntary. As institutions face increasing pressure to report favorable career outcomes for their graduates from accreditation associations, rankings, policymakers, and the public, this creates an ethical dilemma.

Rankings, Competition, and Career Outcomes Data

The tensions institutions face between providing a high career outcomes rate and doing so ethically and transparently was best captured by Gray and Grace (1997) in the National Postsecondary Education Cooperative (NPEC) Working Group on Student Outcomes from a Data Perspective. Their final report described career outcomes data as a "political process" and predicted its proliferation in the industry. At that time, career outcomes data had many use cases, including:

- Providing evidence of institutional effectiveness to policymakers, accreditation associations, and consumers;
- Addressing emerging questions about returns on investment in postsecondary education for individuals and families, states, and the nation at large;
- Providing information to guide local, state, and national postsecondary policy;
- Informing institutional planning, program development, and program improvement in an era of constrained resources;
- Responding to employer concerns about whether postsecondary institutions are adequately preparing students for the workplace;
- Providing information to individuals and families to help them reach informed decisions about postsecondary institutions and programs of study. (p. 2)

Today, the politicization of career outcomes data is materializing. One example is the Gainful Employment rule, which is meant to crack down on career training programs that receive federal funding but do not deliver on their promise of employment (Knott, 2024). In 2024, the U.S. Department of Education also implemented a regulation requiring institutions participating in Title IV federal student aid programs to provide "adequate career services" to their students (Gatta & Taylor, 2024). On the state level, at least 31 states now have some form of performance-based funding model for allocating funds to public universities that link student success and outcomes to funding (NCSL, 2024). While they make up a relatively small portion of appropriations to universities, they signal an increase in holding universities accountable for student success and outcomes (NCSL, 2024).

In addition to the government, ranking and classification systems are increasingly incorporating metrics such as graduate employment rates, average salaries, and student debt into their evaluations of institutions. A recent example is the announcement of an overhaul to the Carnegie Classifications system to include a measure of social and economic mobility (Gast & Gunja, 2024; Lederman, 2024). Recognizing the significance of the Carnegie Classifications in the broader context of higher education, the American Council on Education (ACE) and the Carnegie Foundation for the Advancement of Teaching are revising the classification system to focus on what they define as the mission of higher education: "a springboard to a better life" (Gast & Gunja, 2024).

The U.S. News and World Report also reconfigured its ranking methodology, eliminating factors it no longer deemed important, redistributing weight, and adding new factors based on newly available data, including career outcomes data (Morse & Brooks, 2023). Much like the Carnegie Classifications, the rationale for this change is to reflect the priorities of prospective students and their families: "academic reputation, cost of attending, and return on investment" (Morse & Brooks, 2023, p. 1). While these are just two examples, it is evident that an increasing number of rankings, accreditations, and governing bodies are utilizing career outcomes data as a direct indicator of an institution's value, not just to their students but to society at large.

Linking career outcomes data with rankings is crucial for two main reasons. First, studies have shown that U.S. News and World Report rankings significantly impact institutions (Gnolek et al., 2014; Meredith, 2004; Monks & Ehrenberg, 1999; O'Neil, 2016; Sauder & Espeland, 2009). They influence admissions outcomes, tuition pricing, strategic planning, and internal resource allocation (Gnolek et al., 2014; Meredith, 2004; Monks & Ehrenberg, 1999; O'Neil, 2016; Sauder & Espeland, 2009). Consequently, these "high-stakes rankings" can prompt institutions to manipulate or "game" the system by providing misleading or inaccurate data (Gnolek et al., 2014; Meredith, 2004; O'Neil, 2016; Sauder & Espeland, 2009). Career outcomes data is not exempt from this trend, and given the significant discretion institutions have in obtaining these data, the pressure to report favorably on career outcomes is increasing.

The Question of Ethics

This intense pressure to show positive career outcomes data for graduates has resulted in scandals in which institutions have manipulated or misrepresented career outcomes data. In this context, universities have inflated employment rates and starting salaries or selectively reported data from successful graduates while omitting less favorable outcomes (Dippie, 2022; Jaschik, 2018; Korn, 2022). Recent cases involving Baker College, the Rutgers University Business School, Temple University's Fox School of Business, and the University of Southern California's online education program have drawn national attention to the ethical pitfalls of such practices (Dippie, 2022; Jaschik, 2018; Korn, 2022; Wethington, 2025). These actions compromise transparency and accountability, underscoring the need to examine the ethical dimensions of data collection and reporting for career outcomes data. As institutions navigate the increasingly competitive landscape of higher education, the focus on rankings has overshadowed crucial ethical considerations, particularly regarding the privacy, consent, accuracy, and accountability of career outcomes data.

Privacy and Informed Consent

A central ethical issue in the collection of career outcomes data is the protection of student privacy. In an era where data collection is ubiquitous, students may be unaware of how their information is gathered, stored, and used (Lundie, 2024). Additionally, "data creep" occurs when available data is used for secondary purposes not originally disclosed (Krotov et al., 2020; Lundie, 2024). Moreover, institutions may collect data from third-party sources, such as LinkedIn, without obtaining explicit consent from the graduate (Makela & Hoff, 2018). The underlying assumption is that the information graduates disclose is open for public use. While these practices may improve knowledge rates, they undermine the ethical principles of privacy and informed consent.

In particular, students who may have purposefully withheld information from their institution by not responding to the First-Destination Survey may find that their data has been gathered and used, potentially without adherence to ethical guidelines (Makela & Hoff, 2018). Whether institutions obtain employment information on their graduates through manual public internet searches (e.g., LinkedIn, Google, employer websites) or by using third-party data aggregators (such as data scraping vendors), they often do this without the knowledge or consent of the individuals involved, typically violating the terms of use agreements of LinkedIn and other sites. (Krotov et al., 2020; LinkedIn, n.d.; Makela & Hoff, 2018; Xiao, 2021). This raises significant concerns regarding the extent to which students maintain control over how their personal information is used post-graduation.

In the United States, personal information provided publicly via social media or other sites is generally not protected by law unless it violates intellectual property doctrines, such as copyright or trademark, or the Computer Fraud and Abuse Act (CFAA; Krotov et al., 2020; Xiao, 2021). Current regulations operate under an "opt-out consent" assumption, placing the onus of safeguarding information on the user (Krotov et al., 2020; Xiao, 2021). However, users trust websites and systems to protect their information, much as they trust other users not to violate Terms of Use agreements (Xiao, 2021). Proponents of regulations

aimed at keeping publicly available information private online particularly highlight the unintended harm that can arise from data misuse (Lundie, 2024; Metcalf et al., 2016; Xiao, 2021).

Today, vast amounts of publicly available data from multiple sources can be easily and rapidly amassed and analyzed for various purposes—many of which individuals may not imagine, let alone consent to (Lundie, 2024; Metcalf et al., 2016; Xiao, 2021). Metcalf et al. (2016) identify several categories of harm, including "traditional harms, such as physical pain or psychological distress, as well as perennial surveillance, individual and group discrimination, and 'predictive privacy harms,' where privacy invasions occur through inference rather than direct collection of personal data" (paragraph 12). Within higher education specifically, Lundie (2024) notes that students often have no awareness of how widely their information is shared across campus and through various hierarchical levels, from student staff to the President, as well as with numerous outside vendors. The potential uses of this information may extend beyond their comprehension.

Career outcomes data is not immune to this. While NACE (2020) stresses the importance of privacy, unintentional harm can still be caused. For instance, career outcomes data is now reported alongside other student data obtained from various campus sources, including demographic data, academic and program information, and additional information such as student involvement in athletics and campus life. While most career outcomes data is reported in aggregate, advanced dashboard features allow public users to drill down into specific categories. This means that someone can easily deduce the identity of graduates, their employer, and salary information, which could lead to individual harm. Group harm can also occur unintentionally when career outcomes data fails to represent the populations or programs it reports on accurately.

Accuracy, Consistency, and Representation

Another key ethical challenge is ensuring the accuracy and representativeness of career outcomes data. NACE (2020) recommends that institutions verify outcome data obtained through secondary sources to ensure accuracy. In 2016, Kelly and Walters published a study detailing the process a public research university undertook to align with NACE's First-Destination Survey standards. They found that the most significant challenge was the time required to manually verify survey responses and conduct manual searches on LinkedIn for secondary data. NACE provides limited guidance on how institutions should conduct secondary data searches and obtain accurate, verified, and ethically sourced data.

When performing manual LinkedIn searches to determine graduates' outcomes, significant discretion is left to individual staff members. For example, staff may need to consider whether the employment listed is full-time or part-time or fits into another category. Questions arise, such as: Did the student hold this job before graduation, and if so, does it still count as an outcome? If an internship is listed, is it outdated regardless of the start and end dates, or can it still be counted? If the location is missing, does it mean the graduate is working remotely, or can the employer's location be used? Finally, if a graduate's profile indicates they are still seeking a job, is that recorded or ignored?

To reduce the manual, time-intensive process, nearly 30 percent of universities gathering outcomes data use third-party vendors. These third-party vendors typically scrape publicly available information to save time and money. While research on the accuracy of career outcomes data obtained from secondary sources is limited, Makela and Hoff (2019) examined the fit rate, the proportion of matched data points, between survey responses and scraped data for one public research university. They found the average fit rate between the two sources to be only 71%, with even lower rates for employer and industry information (67%). Furthermore, they found no difference in the quality of scraped data from LinkedIn versus ZoomInfo. In addition to the issue of fit rates, they noted that certain student populations, including international students and those with lower GPAs, were underrepresented in the data scrape (Makela & Hoff, 2019). Whether secondary data is obtained manually or automatically, issues of accuracy and skewed results can lead institutions to career outcomes data that fails to reflect the experiences of the entire graduating class accurately.

Beyond accuracy, representation and the lack of quality in the available data are notable concerns. NACE (2020) guidelines encourage institutions to strive for a 65% knowledge rate, defined as the sum of the first-destination survey response rate and any secondary data gathered. According to NACE's published *First Destinations for the College Class of 2023* (2024), the average knowledge rate for Bachelor's degrees is 55.8%, falling well short of their goal. Knowledge rates are higher at private institutions (by 20%) and smaller universities with fewer than 10,000 students (NACE, 2024). However, few institutions publicly disclose survey response rates, which are crucial for understanding and analyzing career outcomes data (Bryant, 2021).

One issue is nonresponse bias, where graduates who are unwilling or unable to participate in the survey differ significantly from those who complete the survey (Cook et al., 2000). This bias can impact data validity by skewing results favorably, as graduates who are employed or continuing their education are more likely to complete the survey than those who are not (Bryant, 2021; Cook et al., 2000). In a comparison of survey methodology with wage record data obtained from the state, Bryant (2021) found that "survey methodology produced an approximately 10% higher employment rate (for an overall rate increase of 7.5 percentage points) and a 30%–45% higher average salary measure, based on a 50% smaller sample than wage record methodology" across two graduating classes (p. 11).

This nonresponse bias has significant implications for equity. According to NACE's 2023 First-Destination report, White students, students who identify as male, and those in specific majors, such as business or engineering, tend to have higher knowledge rates, either because they tend to respond to the survey at higher rates or because more career outcomes information is available online. These groups also report higher positive career outcomes, employment rates, and salaries than Black or Hispanic students and those identifying as female or nonbinary (NACE, 2024). This highlights persistent inequities in access to post-graduation opportunities among different demographic groups and disparities in survey participation and data accessibility (NACE, 2024). Addressing these gaps is critical to ensuring that career outcomes data accurately reflects the experiences and needs of all students, providing a more equitable foundation for institutional

decision-making and enabling external stakeholders to make informed assessments based on reliable information.

A high response rate can help reduce nonresponse bias (Cook et al., 2000; Groves & Peytcheva, 2008). However, achieving a high response rate is not always in an institution's best interest. While higher response rates may minimize bias, they often lead to lower career outcome rates, creating little incentive for institutions to prioritize them. For example, institutions that make completing a first-destination survey a requirement for commencement often achieve response rates exceeding 80%. However, their career outcome rates tend to be lower because most of the data is collected at graduation, when many graduates have not finalized their post-graduation plans. Additionally, only a small percentage of graduates provide updates in the six months following graduation. In contrast, some schools, particularly liberal arts institutions, delay surveying their graduates until 4 to 6 months after graduation. Although this approach results in lower response rates, it produces higher outcome rates, as timing significantly impacts survey results (Makela & Hoff, 2019).

Accountability and Institutional Responsibility

Institutions mislead the public by highlighting a high career outcomes rate without acknowledging low response rates or the absence of a representative sample. This practice can create a false sense of reality for prospective students, who may believe the data reflects most graduates' success when it represents only a small, potentially skewed portion of the population. For example, an institution might report a 95% employment rate but fail to mention that this figure is based on responses from 20% of graduates, leaving the experiences and outcomes of the majority unaccounted for. Such omissions can lead to students making life-altering decisions based on incomplete or misleading information (Kerr, 2020).

In their research, Bradley (2013) evaluates how universities in the UK mislead and misinform the public through their prospectuses. The study found that institutions mislead the public in their data-driven marketing efforts across nine categories, including “omission of facts and selective reporting; misleading wording; misleading inferences about an attribute; misleading associations between attributes; misleading endorsements; claim-fact discrepancies; falsehoods; carefully crafted comparisons; and claims without a reference point” (p. 74). Using Bradley’s (2013) nine types and applying them to real examples of U.S. institutions and career outcomes data, Table 3 shows the prevalence of using data to mislead prospective students and the greater public.

Providing accurate career outcomes data has increasingly fallen on educational institutions, and the temptation to prioritize competitive advantage over ethical responsibility must be acknowledged. The lack of strong enforcement of ethical guidelines, coupled with insufficient oversight, allows institutions to report misleading or incomplete data with minimal consequences. Whether it is institutions that tout high career outcome rates while hiding their low response rates, those who select favorable data to improve their results, or worse, those who falsify their data entirely, this erosion of trust further undermines the integrity of the higher education system.

Table 3. *Nine Ways Institutions Mislead the Public with Career Outcomes Data*

Type	Definition	Example
1. Omission of Material Facts and Selective Reporting of Data	Failing to disclose necessary information or limiting conditions for correctly interpreting a claim.	A university reports a 90% career outcomes rate but omits that the figure only reflects a small percentage of the graduating class.
2. Misleading Wording	Using confusing language that leads to misunderstandings.	A college advertises a high employment rate for its recent graduating class without acknowledging that many are employed part-time, causing prospective students to overestimate actual outcomes.
3. Misleading Inferences About an Attribute	A claim about an attribute leads to other misleading inferences about the same attribute.	A school claims graduates earn high salaries when their salaries are inflated from only one program, leading to the assumption that all programs offer similar financial outcomes.
4. Misleading Associations Between Attributes	A claim about one attribute encourages a belief about another attribute without evidence.	Highlighting hands-on curriculum or high internship participation numbers to imply superior career outcomes without providing supporting data that such programs lead to employment.
5. Misleading Endorsements	Presenting endorsements or evidence that appear independent but are not.	Featuring testimonials from graduates with prestigious jobs, suggesting these outcomes are typical while omitting that these individuals had unique advantages.
6. Claim-Fact Discrepancy	A claim that is true but requires qualifications to be properly understood.	Reporting that 90% of graduates are employed within six months without clarifying that many work in roles where a degree is not required.
7. Falsehoods	Claims that are simply untrue.	An institution falsifies employment data to inflate its career outcomes rate.
8. The Carefully Crafted Comparison	Carefully selecting terms of comparison to present a more favorable picture.	Claiming the highest employment rate among regional schools by excluding stronger-performing competitors from the comparison.
9. Claims Without a Reference Point	Offering data without a reference point making it difficult to evaluate.	Advertising an average graduate salary of $50,000 without providing any benchmarks for context.

Louch and Pry (2020) highlight the significance of data presentation, stating, "How one presents data, regardless of whether it relates to financial performance, consumer preference, or any other topic on which information is collected and analyzed, determines the way in which the receiver understands it" (p. 10). They argue that those who provide information have a responsibility to do so "clearly, coherently, and completely" (p. 5). Bradley (2013) emphasizes that higher education institutions, in particular, need to be held to a higher standard when using data in their marketing campaigns, compared to business and corporations. First and foremost, getting a degree today is a significant financial and time investment, which can have an immense impact on one's life. It is also not something you can simply try out before fully committing to and there are no refunds. Furthermore, their marketing campaigns often focus on vulnerable groups, including minors and those from lower-income households, who may not have the necessary information or resources to make well-informed decisions. Lastly, universities are highly regarded for their academic achievements, lending them a level of trust and credibility that few other organizations possess. It is essential they use that trust wisely by acting with integrity and remaining accountable to the communities they serve.

Solutions

Career outcomes data is unlikely to lose its importance anytime soon. Its growing influence on institutions, accreditation bodies, rankings, and policy decisions underscore its critical role in shaping higher education. However, this heightened focus on career outcomes has also given rise to numerous ethical challenges in collecting and reporting data. These practices not only risk harming the individuals and groups being surveyed but also have the potential to mislead the public and erode trust in higher education. As such, institutions are responsible for ensuring transparency and upholding ethical standards in collecting and reporting career outcome data.

Before solutions are proposed to address some of the ethical pitfalls in career outcomes data, it is important to note that while institutions have established data governance and Institutional Review Boards (IRB) to ensure data privacy and ethics are observed, career outcomes data tends to fall outside their scope of purview. According to the exceptions for IRB review, career outcomes data is reported on in the aggregate and is not considered sensitive, thus not causing any harm to individuals (U.S. Department of Health and Human Services, n.d.). Furthermore, it is seen as administrative data collected for institutional improvement, not for publishing findings or contributing to greater knowledge (U.S. Department of Health and Human Services, n.d.).

Similarly, data governance refers to the framework and processes by which colleges and universities manage, protect, and use their data effectively and ethically (Banks, 2024). It differs in size and scope from institution to institution. However, its key aspects are ensuring data accuracy, accessibility, privacy and security, data integration, data policy development and enforcement, and ethical use of data (Banks, 2024). However, not all data should be or is governed within a college or university (Glasgal & Nestor, 2020). Data governance may oversee one or more of the following types of data, including shared data, which are data used across multiple departments and business units at the institution; critical data, which is critical to business functions and could cause financial or criminal

penalties if interrupted; and strategic data, which is integral to strategic initiatives of the university such as retention or enrollment data (Glasgal & Nestor, 2020). Data often not included in data governance includes data that is important and helpful for a department or business unit but not the overall institution (Glasgal & Nestor, 2020). Because career outcomes data is owned mainly by career services departments, used for improving career service programming, and is not tied to a student's educational record, it is often not overseen by data governance on campus.

Beyond simply adding career outcomes data into IRB or data governance frameworks, there are three short and long-term solutions to ethically collect and report career outcomes data: (a) review, edit, and document the data collection process, (b) build towards a data-informed decision-making culture on campus, and (c) going beyond career outcomes data to tell your institution's success story. This section describes each of these in more detail.

Review, Edit, and Document

One of the first and most crucial steps is for university staff to review their data-gathering and reporting processes to identify where ethical conflicts may arise and how they can align their practices with institutional data governance plans, institutional review boards, values, and mission. To do this well, a committee should be convened, ideally of diverse roles and functions across campus, and might include people from career services, institutional research, marketing, members from the institution's data governance board, information technology, and other faculty interested in the topic or experts on data ethics. While this approach may take longer, a diverse committee allows fresh perspectives on processes, creates buy-in, and shares the workload and responsibility of career outcomes data across the institution (Fioriglio, 2023; Kelly & Walters, 2016; Webber & Zheng, 2020). Building relationships and establishing a cross-campus committee on career outcomes data can ensure ethical gathering and reporting, boost response rates, and elevate the overall importance of the data (Kelly & Walters, 2016; Webber & Zheng, 2020).

When reviewing current campus practices, Segalla & Rouziès (2023) provide a framework known as "The Five Ps of Ethical Data Handling." The five Ps are provenance, purpose, protection, privacy, and preparation. Below are their definitions:

1. Provenance refers to how data was acquired and whether informed consent was obtained.
2. Purpose refers to ensuring the data gathered isn't being repurposed for other uses beyond its original parameters.
3. Protection refers to how data is being stored and protected.
4. Privacy refers to the anonymity of the data set and who has access to the data.
5. Preparation refers to ensuring accurate, verifiable data and dealing with missing data and variables.

The committee should work together to identify where ethical pitfalls occur as they review the career outcomes data gathering and reporting processes and how those can be solved. For example, obtaining informed consent is notoriously difficult, regardless of the research topic (Xiao, 2021). However, many career center directors have noted that

fostering buy-in and clearly explaining how career outcomes data is used can enhance the ethical process and potentially increase survey response rates (Fioriglio, 2023). While this may be a long-term focus for the committee, a simple additional step of obtaining informed consent can come when procuring secondary data sources. Suppose an institution uses LinkedIn or a data scraping service to find additional data on graduates. In that case, they can reach out (via phone, email, or LinkedIn) to these graduates to obtain consent, verify information, and fill in any missing gaps. While it is an additional step in the process, it reinforces the institution's commitment to accurate, verifiable, and ethically obtained data.

As processes are reviewed and changes are made, the committee must document the steps and any changes for future reference. Documentation ensures consistent data collection and reporting over time and through staffing transitions. It also ensures that the data methodology is clearly outlined, published, and publicly available, just as any other research. Also, proper documentation can safeguard data and processes if they are scrutinized by the public or governing bodies in the future.

Build Toward a "Data-informed Decision Making" Culture

Technological advancement has resulted in a proliferation of data available on campus (Maldonado et al., 2021; Mathies, 2018; Webber & Zheng, 2020). Every action a student takes, from logging into a system to completing a form to swiping their ID, are data points collected, stored, and used in various ways at institutions (Mathies, 2018; Webber & Zheng, 2020). Yet, as Webber and Zheng (2020) argue, there is a gap between having the data and using that data to make informed decisions that provide solutions to key challenges on campus. This is especially the case with career outcomes data. While career outcomes rates can be seen splashed on billboards nationwide, websites, and admissions materials, most institutions lack the resources to utilize career outcomes data beyond its marketing function. This is where data-informed decision-making can make a difference.

Data-informed decision-making, or DIDM, is "the process of organizing data resources, conducting data analysis, and developing data insights to provide contexts and evidence base for formulating organizational decisions" (Webber & Zheng, 2020, p. 8). DIDM has gained popularity in recent years because analytics increasingly supports operations at colleges and universities, including student success, enrollment and strategic differentiation, and academic and curriculum innovation (Webber & Zheng, 2020). In such a data-informed campus culture, career outcomes data can be utilized in many ways to support an institution's strategic direction.

For instance, Hanover Research's recently published report, *2025 Trends in Higher Education*, highlights the growing demand for career-aligned academic programs as its top trend. The first step in such an undertaking is gathering and analyzing data to make informed decisions (Rodgers, 2024). In this case, career outcomes data, along with current and prospective student interest surveys, enrollment data, labor market trends, market saturation, and alumni and employer surveys, could be used to identify appropriate changes in the curriculum that would yield the best results (Rodgers, 2024). In addition to a career-aligned curriculum, there are several other ways career outcomes data can be used to meet institution-wide goals, including improving student career and academic

outcomes, identifying and bridging student skills gaps, building employer relationships, and supporting fundraising goals (King, 2021). A data-informed campus culture can help increase the visibility, relevance, and utilization of career outcomes data.

In addition to elevating career outcomes data, such a culture improves data ethics on campus in two meaningful ways: First, it will reduce data silos and increase data transparency, helping to ensure career outcomes data is gathered and reported with integrity. As Webber and Zheng (2020) note, this transparency may "reveal some inconvenient truths about the performance of colleges and universities" (p. 19), but it also holds institutions accountable. Second, it will increase data literacy on campus, equipping faculty, staff, and students with the knowledge and confidence to critically evaluate how data is collected, interpreted, and reported, ensuring ethical standards are upheld (Maldonado et al., 2021; Webber & Zheng, 2020).

While the benefits far outweigh the cost, it is important to acknowledge that building a data-informed decision-making culture is a long-term strategy requiring senior leadership commitment at the highest levels. Some of the crucial components to building such a culture include: (a) expert talent empowered by senior leadership to lead the charge, (b) technology and resources to integrate, (c) manage and safely house and share large data sets, (d) training and professional development across all levels of campus, and lastly (e) senior leaders with a willingness to take risk and innovate (Webber & Zheng, 2020). Alternatively, Maldonado et al. (2021) provides a more grassroots approach to building a data-informed campus, including identifying and bringing together data champions and ambassadors from across the institution to provide training, establishing unified metrics and a data dictionary, and establishing partnerships that guide data governance and streamline data processes. With this approach, those overseeing career outcomes data collection and reporting can play a crucial role in building a data-informed culture from the bottom up.

Going Beyond Career Outcomes Data

Career outcomes data should not solely determine the value of a degree, nor should institutions be held entirely responsible for the employability of their graduates, given that external factors like the economy and labor market significantly impact whether a graduate can achieve their career goals. While it is a valid data point, career outcomes data represents only a snapshot of information at a given time. Furthermore, as more institutions report career outcome rates upwards of 90%, career outcomes data no longer serve as a differentiator. Thus, institutions must take ownership of their value narrative and broaden their focus.

One of the ways that institutions can go beyond career outcomes data is by highlighting how institutions support their students' career development through well-established initiatives like experiential learning, embedded career competencies in the classroom, alumni-student mentoring programs, and more (Harvey, 2005; Kerr, 2020). This allows institutions to draw on additional data sets, such as for-credit internship completion or pre- and post-survey data and reflections on career competencies. Triangulating data from multiple sources can provide a richer, more nuanced understanding of career outcomes

data and showcases a favorable narrative of an institution's commitment to students' career development.

Several institutions are leaning into other surveys and data to showcase career outcomes success, including feedback from current students, alumni, and employers. For example, Western Governors University (2023) showcases data from the National Survey of Student Engagement (NSSE), Gallup Alumni Survey, WGU-Harris Poll Graduates Study, and Harris Employer Survey to better understand the overall success of their students and alumni. Lightcast, a leader in labor market data, offers universities a chance to dig into alumni career pathways via interactive dashboards, as well as through the National Alumni Career Mobility (NACM) survey, which provides alumni sentiment data on educational experiences, career satisfaction, and much more from alumni five to ten years post-graduation (Lightcast, n.d.). Steppingblocks, a big data analytics company, also provides alumni career insights beyond recent graduate outcomes and utilizes data to help inform students of career pathway options (Steppingblocks, 2024). This additional data can help fill in missing gaps from career outcomes data and provide a more holistic narrative on how alumni are faring post-graduation and where the institution can continue to improve.

Conclusion and Further Discussion

The competitive pressures in higher education, coupled with the growing demand to demonstrate the ROI of a degree, have created a complex environment where ethical practices in collecting and reporting career outcomes data are frequently compromised. While organizations like NACE have made progress in promoting transparency and consistency, critical ethical concerns—such as privacy, consent, accuracy, and accountability—remain insufficiently addressed. As highlighted through several examples, some institutions continue to falsify, misreport, and mislead the public with career outcome data. Despite this, institutions retain significant discretion in gathering and presenting this information.

This article seeks to ignite meaningful discussions on the ethics of career outcomes data, promoting a higher education system that upholds and strengthens public trust. The goal is not to push for greater oversight but to empower institutions to take ownership of the career outcomes narrative and broader student success. By adopting ethical practices, institutions can take control of how their value is conveyed, ensuring that data accurately represents their students' diverse backgrounds, outcomes, and experiences, ultimately building trust with the public.

To this end, existing data governance structures should expand their ethical considerations to include career outcomes data. Those responsible for managing these data must take the lead in updating processes with ethics at the forefront. As campuses increasingly rely on data, senior leaders and data users have a shared responsibility to build a culture of data-informed decision-making that prioritizes transparency, breaks down data silos, and safeguards students. Finally, rather than succumbing to market pressures around outcomes data, institutions should collaborate to reshape the narrative on college and degree value by incorporating broader perspectives and additional metrics beyond career

outcomes. By doing so, they can inspire confidence in the higher education system and demonstrate a genuine commitment to student success.

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Appendix
Core First-Destination Survey Questions

Question Category	Definition	Sample
Outcome Categories	NACE encourages using standard outcome categories, which are also included in its reporting. These are: ● Employed full-time ● Employed part-time ● Participating in a volunteer or service program ● Serving in the U.S. Military ● Enrolled in a program of continuing education ● Seeking Employment ● Seeking education but not yet enrolled ● Not seeking employment or education at this time	Which of the following BEST describes your PRIMARY status after graduation? Please select only ONE of the following categories:
Type of Employment	NACE encourages using standard outcome categories, which are also included in its reporting. These are: ● Employed as an entrepreneur ● Employed in a temporary/contract work assignment ● Employed freelance ● Employed in a postgraduate internship or fellowship ● Employed in all other work categories	Please select the category that BEST describes your employment:
Employment Information	Organization, job title, salary and bonus information, location	Please provide the following information concerning your employment:
Service Program Information	Organization, role, location	Please provide the following information concerning your service:
Military Information	Service branch, rank	Please provide the following information concerning your military service:
Continuing Education Information	Institution, program of study, degree to be earned, location	Please provide the following information concerning your education:

Question Category	Definition	Sample
Contact & Demographic Information	To help ensure accuracy, many institutions will ask for contact information or link surveys to individualized graduates to track who has responded and who has not. In addition, NACE has started to request institutions provide demographic data, including race/ethnicity and gender.	Please provide your contact information below: Name, Student ID, institution email, personal email, phone

Note. The information in this table has been gathered and summarized from the NACE *Standards and Protocols for the Collection and Dissemination of Graduating Students Initial Career Outcomes Information for Undergraduates* (2020) and the NACE website.