

November 14, 2013

Ms. Kate Mullan  
Acting Director, Information Collection Clearance Division  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202-4537

Dear Ms. Mullan:

This letter is in response to the Department of Education's notice of the Integrated Postsecondary Education Data System (IPEDS) 2013-2016 collection (OMB Control Number: 1850-0582), published in the Federal Register on October 2, 2013 and updated on October 23, 2013. The Institute for Higher Education Policy (IHEP) is a nonpartisan, nonprofit organization committed to promoting access to and success in higher education for all students, particularly those who have traditionally been underserved by our postsecondary system. We produce innovative and timely research to inform both policy and practice.

Given IHEP's contribution to the research community, we recognize the importance of data. Specifically, we recognize that data are key to understanding the challenges facing our postsecondary system, developing policy solutions to address them, and providing relevant and actionable information to consumers, policymakers, and institutions alike. IPEDS is a critical component of our postsecondary data infrastructure, providing detailed data at the institution level to inform institutional improvement efforts, consumer decisions, and to safeguard taxpayer dollars. We applaud the Department's efforts to improve the outcome reporting within IPEDS, as to capture better data on actual student progression and success. For consistency and usability purposes, we highly recommend that these new outcome measures be reported in a way that allows for the calculation of graduation rates that are analogous to those already reported through the Graduation Rate Survey (GRS). Not only is this alignment essential to create usable, understandable data, but it also will help reduce complexity and reporting burden. Complementary to these specific suggestions about the alignment of the new outcome measures with the GRS survey, we also offer the following recommendations for making the IPEDS collection as useful as possible:

- *Disaggregate the outcome measures by credential type*, reporting outcomes for bachelor's-seeking students separately from associate-seeking and certificate-seeking students. Institutions increasingly are offering a diverse array of credentials, and aggregating outcomes across these programs of differing lengths could create misleading results.
- *Include better information on transfer*, including whether students transfer upward (e.g. two-year to four-year), laterally (e.g. two-year to two-year), or in reverse (e.g. four-year to two-year). This distinction will provide a far more robust understanding of student movement throughout the postsecondary system.
- *Minimize reporting burden and maximize usability* by aligning the new outcome measures as closely as possible with the existing Graduation Rate Survey (GRS). Using slightly different definitions for the outcome measures than for the GRS likely will add complexity and decrease usability.
- *Require institutions to report graduation rates by financial aid status to IPEDS*. While institutions are required to disclose these data upon request, they are not widely available or accessible in a central location.

- *Require institutions to report graduation rates by military status to IPEDS.* Institution-level data on the success rates of service men and women are unavailable, and IPEDS is the best tool available to collect this information.
- *Require institutions to report cumulative debt measures to IPEDS.* Institutions should report data to IPEDS on cumulative federal debt and cumulative private debt, disaggregated by completion status.

## Outcome Measures

### *Disaggregate Student Outcome Data by Credential Type*

The new outcome measures, as proposed, do not separate students in bachelor's programs from those in associate programs or certificate programs. For four-year institutions, the current Graduation Rate Survey – rightfully – allows for separating bachelor's-seeking students from students in shorter programs in both the cohort specification and the counts of completers, thereby allowing for a variety of completion rates to be calculated. Institutions with substantial numbers of students in associate or certificate programs likely will have higher graduation rates than if they were to be measured on their bachelor's programs only. For example, the University of Phoenix's Online Campus has a total graduation rate of 17 percent, but a bachelor's-seeking graduation rate of only 6 percent. Clearly, the 17 percent total graduation rate is masking the lower completion rates of students in bachelor's programs. This distinction is vitally important to students who are considering a particular type of credential from an institution that offers a variety of award levels. Without the bachelor's-specific data available in the GRS, a student considering a bachelor's degree from the University of Phoenix's Online Program could mistake their chance of completion for being nearly three times higher than it actually would be (17% vs. 6%). We strongly encourage the Department to disaggregate both cohort and completion data by level of credential sought and level of credential awarded. Additionally, these credential levels should be adjusted to align with the undergraduate credential levels reported in the Completions Survey: associate, bachelor, less-than-one-year certificate, one-to-two year certificate, two-to-four year certificate.

Certainly – as the Department has pointed out previously – success can be measured in a number of ways. However, disaggregating the outcome data by type of award does not preclude some awards from counting as “successes,” nor does it pass judgment on the quality or value of different credentials. Rather, this disaggregation would provide consumers and policymakers with more comprehensive, clear, and comparable data that can be used to inform decisions without inadvertently misleading. We do not suggest that some awards be counted and others omitted, but instead recommend that *all* awards be counted, but disaggregated.

### *Include Better Information on Transfer*

By only providing data on the number of students who subsequently enroll at another institution, the Outcome Measures as proposed do not provide adequate information about student transfer. To get a complete understanding of student movement throughout the postsecondary system, institutions should report the number of students who subsequently enroll in a four-year institution, the number of students who subsequently enroll in a two-year institution, and the number of students who subsequently enroll in a less-than-two-year institution. This disaggregation by level of receiving institution does not pass judgment on the type of institution, but rather, provides a more robust and accurate picture of student outcomes and pathways. Students enter postsecondary education with a variety of goals in mind, and they should have access to information that clearly reflects their ability to achieve those various goals.

While the Department has noted that disaggregating transfers by level of receiving institution could be overly burdensome for institutions, we disagree, and contend that this information is essential. The same data run that determines *if* a student enrolled at another institution, likely will determine *which* institution the student enrolled in, allowing the initial institution to report the level of receiving institution without a large additional burden. In fact, institutions and higher education systems across the country already are reporting transfer data with this level of detail through voluntary initiatives like Complete College America ([www.completecollege.org](http://www.completecollege.org)) and Access to Success (<http://www.edtrust.org/issues/higher-education/access-to-success>) – an initiative led by The Education Trust and the National Association of System Heads. Finally, we understand that students may transfer into a program that does not match the institution’s level (e.g. an associate program at a four-year institution). However, this limitation should not preclude efforts to collect better data on upward and lateral transfers. Even if imperfect, transfer data disaggregated by level of receiving institution would represent a substantial improvement over current data sources *and* would greatly improve the quality of the proposed outcome measures.

#### *Minimizing Reporting Burden and Maximizing Usability*

Improved data on student outcomes in our postsecondary system are crucial, but we must balance this need for better information with the associated institutional burden and the usability of the data produced. By creating a new Outcome Measures component, rather than incorporating the outcome data on part-time and transfer students into the Graduation Rate Survey (GRS), this proposal risks increasing burden unnecessarily and reducing usability.

#### *Burden*

We realize that the Department is attempting to minimize burden by not requiring all of the disaggregations (race/ethnicity and gender) that are included in the current GRS. However, these disaggregated rates provide a crucial look at how well different students fare at individual institutions. A number of voluntary postsecondary data efforts – such as the Voluntary Framework of Accountability, Complete College America, and Access to Success – have recognized the importance of these disaggregations and incorporated them into their reporting mechanisms, proving that such data collection is not overly burdensome, but in fact worthwhile and highly desirable.

Creating a new survey component that uses slightly different specifications may actually increase burden more than incorporating the new data points into the existing GRS. Under the current proposal, institutions will need to make calculations on both components separately – and those calculations will not fully align. For example, the GRS tracks student outcomes for 100%, 150%, and 200% of time, while the new outcome measures will track outcomes for six years and eight years. For four-year institutions, six years is equivalent to 150% of time and eight years is equivalent to 200%, but two-year and less-than-two year institutions will not benefit from this alignment. Instead, they will need to report completely new data. Furthermore, neither of these components aligns with IPEDS’ first-to-second-year retention rates, which are reported separately for first-time, full-time students and first-time part-time students, but not disaggregated by race/ethnicity, gender. At four-year institutions, the retention rates are reported only for first-time bachelor’s-seeking students, even if many students at the institution are pursuing other types of credentials. At less-than-four-year institutions, the retention rates are reported for a cohort of all first-time degree/certificate-seeking students.

### *Usability*

Under the proposed specifications, the new outcome data will not be directly comparable to the existing GRS data. As mentioned above, the timeframes will not align for less-than-four-year institutions. Also, as discussed at the beginning of this letter (under “By Degree Credential Type”), the new outcome measures will not create a completion rate for bachelor’s-seeking students that is analogous to the bachelor’s-seeking graduation rate in the GRS. Having a host of new outcome measures that cannot be compared directly to the existing graduation rates – which the postsecondary community already is accustomed to using – will create usability and consistency challenges throughout the system. Minimally, college leaders should be able to use these data to understand how a cohort of students is progressing into and through their institutions; but they will not be able to do so with these data since the various survey cohorts do not align across the pipeline (e.g. enrollment, retention, completion/transfer, further enrollment, drop out).

To address these issues of burden and usability, we recommend using 100%, 150%, and 200% timeframes instead of six and eight years as currently proposed in the new Outcome Measures. We also recommend that instead of creating an entirely new component, the Department should incorporate into the existing GRS:

- (1) the three new cohorts (first-time, part-time; non-first-time, full-time; and non-first-time, part-time), disaggregated by type of credential sought (associate, bachelor, less-than-one-year certificate, one-to-two year certificate, two-to-four year certificate), and
- (2) new outcome measures for all four cohorts. These outcome measures should include the number of students who – within 100%, 150%, and 200% of time:
  - a. Received a bachelor’s degree,
  - b. Received an associate degree,
  - c. Received a less-than-one-year certificate,
  - d. Received a one-to-two-year certificate,
  - e. Received a two-to-four-year certificate,
  - f. Are still enrolled at the same institution,
  - g. Are subsequently enrolled at another four-year institution,
  - h. Are subsequently enrolled at another two-year institution,
  - i. Are subsequently enrolled at another less-than-two-year institution,
  - j. Have an unknown subsequent enrollment status, and
  - k. Did not receive an award.

Data are already available on the number of students who are still enrolled after 200% of time and on the number of students who transfer out (for institutions with a transfer mission or institutions that voluntarily report), so some of these recommended data points could be populated with data that already are being collected.

Ideally, these new cohorts and outcomes should be disaggregated by race/ethnicity and gender to align with the existing first-time, full-time graduation rates. At the very least though, the Department should leverage the existing GRS survey to ensure alignment with current data collection efforts, even if the new metrics are not fully disaggregated at this time.

## Other Improvements to Graduation Rate Survey

Better information on the success of transfer and part-time students through these new outcome measures is key, but other crucial revisions to IPEDS are necessary to provide a more complete picture of student success. Recommended improvements to IPEDS are outlined below.

### *Graduation Rates By Financial Aid Status*

Current data do not provide information on how well various institutions are performing with students from different socioeconomic backgrounds. Disaggregating graduation rate data by race and gender has uncovered a host of inequities that would have remained hidden otherwise. These data also have uncovered bright spots of promise, where some institutions are performing particularly well with underserved student populations; provided students with useful information to inform their college decisions; and helped institutions identify populations on which to focus their improvement efforts. Graduation rate data by income level – or financial aid status, as a proxy – would provide another set of rich information. As such, we strongly recommend that the National Center for Education Statistics (NCES) require institutions to report graduation rates separately for (1) Pell Grant recipients, (2) Non-Pell Grant recipients who receive subsidized Stafford loans, and (3) Non-Pell Grant recipients who do not receive subsidized Stafford loans. This data collection would estimate institution-level graduation rate for low-income, middle-income, and high-income students and should be integrated into the GRS and the new Outcome Measures component. All institutions *already are required* to calculate these graduation rates to meet disclosure requirements,<sup>1</sup> so reporting these data to IPEDS should not represent an additional data collection burden. Also, more than 500 institutions, 19 systems, and about 30 states already are collecting and reporting similar information through initiatives like Access to Success, Complete College America, and the Voluntary Framework of Accountability, proving that such data collection is indeed possible.

While the NCES sample surveys provide a glimpse into national level success rates of students from different socioeconomic backgrounds, they do not provide the necessary institution-level data to truly inform decision-making. Also, we understand that the Department is working to calculate graduation rates for Pell Grant recipients using the National Student Loan Data System (NSLDS). However, the data in NSLDS cannot be used to calculate an accurate comparison graduation rate for non-Pell/non-subsidized Stafford loan recipients because only Title IV aid recipients are included in the database. Furthermore, any data using the new completion flag in NSLDS are untested and rely on the accuracy, completeness, and adequacy of institutional reporting to NSLDS. At least until these new data are proven to be of high quality, IPEDS serves as a better data collection and reporting tool – particularly for this data element, which institutions are required to calculate under current law.

### *Graduation Rates By Military Status*

Just as graduation rate data should be disaggregated by race/ethnicity, gender, and financial aid status, they also should be disaggregated by military status to measure the success rates of veterans and servicemembers. Members of the military are increasingly seeking out educational opportunities in which to invest their Post-9/11 GI Bill and Military Tuition Assistance Program funds – programs that funded 1.2 million students in Fiscal Year 2010.<sup>2</sup> We owe our servicemen and women access to accurate information that will help them select institutions that offer them the greatest chance of success. At the very least, IPEDS should collect data on 150% graduation rates of first-time, full-time (1) veterans, (2) servicemembers, and (3) non-military students. Ideally, all outcome measures (first-time, full-time; first-time, part-time; non-first-time, full-time; non-first-time, part-time) should be disaggregated by military status.

<sup>1</sup> “Information Required to Be Disclosed Under the Higher Education Act of 1965: Suggestions for Dissemination,” National Postsecondary Education Cooperative, October 28, 2009, <http://nces.ed.gov/pubs2010/2010831rev.pdf>

<sup>2</sup> “Report and Suggestions from IPEDS Technical Review Panel #36 Collecting Data on Veterans,” RTI International, [https://edsurveys.rti.org/IPEDS\\_TRP/documents/Report%20and%20Suggestions%20from%20TRP36\\_final.pdf](https://edsurveys.rti.org/IPEDS_TRP/documents/Report%20and%20Suggestions%20from%20TRP36_final.pdf)

### *Cumulative Debt*

As concern mounts over the rising cost of college and the burdensome debt students are incurring to access and complete higher education, better information is necessary on how much students borrow. Currently, we do not know how much debt students take on to attain a credential from a particular institution. To make this information available, institutions should be required to report data to IPEDS on median federal debt and median private loan debt for completers and for non-completers. While the Department has signaled efforts to calculate these data using NSLDS, those data suffer from the same challenges as the Pell graduation rates: the completion flag is untested and relies on the accuracy, completeness, and adequacy of institutional reporting to NSLDS. Additionally, NSLDS only includes federal student loans, without providing any data on private borrowing. Until the NSLDS data are tested and include data on private student loans, IPEDS should act as a conduit for this crucial information.

When reported to IPEDS – or even if calculated from NSLDS – these cumulative debt data must be disaggregated by completers and non-completers, so as not to present misleading information as is currently presented in the College Scorecard. If cumulative data is calculated for completers and non-completers, combined, then an institution with high costs and high dropout rates could appear to have the same debt levels as an institution with low costs and low dropout rates. Representing these institutions as having similar levels of debt could do a great disservice to prospective college students. Furthermore, while data on debt loads are available at the national level through NCES' sample surveys, these surveys do not provide institution-specific information that could inform student decision-making or targeted policymaking.

As noted below, these comments also are supported by the Center for Law and Social Policy (CLASP), Data Quality Campaign, and National College Access Network (NCAN). We appreciate the Department's efforts to improve postsecondary data systems and strongly support efforts to compile better, more complete data on student outcomes. Thank you for the opportunity to comment on these crucial changes to IPEDS and for thoughtful consideration of our recommendations. If you have any questions, please do not hesitate to e-mail or call Mamie Voight ([mvoight@ihep.org](mailto:mvoight@ihep.org), 202-587-4967)

Sincerely,



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