

January 17, 2017

Kate Mullan  
Acting Director of the Information Collection Clearance Division  
U.S. Department of Education  
400 Maryland Avenue SW., LBJ, Room 2E-343  
Washington, DC 20202-4537

Dear Ms. Mullan:

This letter is submitted on behalf of these 14 undersigned members of the Postsecondary Data (PostsecData) Collaborative, in response to the November 9, 2016 announcement regarding the addition of Pell disaggregates to the Outcome Measures (OM) survey component of the Integrated Postsecondary Education Data System (IPEDS). PostsecData comprises organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

We appreciate the Department's detailed consideration of [technical recommendations we submitted on April 18, 2016 as public comment](#), and the decision to convene Technical Review Panel #50 in August 2016 to discuss the proposed changes to IPEDS. The PostsecData Collaborative is further encouraged by the revised proposals to include Pell recipient data in OM starting in 2017-18 and in the IPEDS Graduation Rates (GR) survey component in 2016-17. While the Pell recipient data in the GR component will match the pre-existing disclosure requirement in the Higher Education Act and produce a measure that is comparable to other completion rates, the inclusion of Pell in OM will provide extremely valuable information about the millions of postsecondary students who are not captured in the traditional first-time, full-time student cohorts.

The continued and enhanced collection of these data is vital to understanding and ultimately supporting better postsecondary outcomes for all students. The Department of Education's willingness to incorporate feedback into its processes and implement these revisions demonstrates its responsiveness to the field, commitment to improving student success, particularly among students from low-income backgrounds, and dedication to supporting our institutions of higher education in their mission to educate those students.

Thank you for the opportunity to comment and offer technical feedback on these revisions, and for incorporating PostsecData's detailed recommendations. If you have any questions, please do not hesitate to contact Mamie Voight at [mvoight@ihep.org](mailto:mvoight@ihep.org) or (202) 587-4967.

Sincerely,

Achieving the Dream  
Association for Career and Technical Education  
Data Quality Campaign  
The Education Trust  
George Washington University Institute of Public Policy  
Georgetown University Center on Education and the Workforce  
Institute for Higher Education Policy  
National College Access Network  
National Skills Coalition  
New America

The Institute for College Access & Success  
uAspire  
Western Interstate Commission for Higher Education  
Workforce Data Quality Campaign