

Integrated Postsecondary Education Data System (IPEDS) 2013-2016

Docket: ED-2013-ICCD-0128

Comment On: FR Doc # 2013-24041

Public Comments Received During the Second 30-day Comment Period and NCES Responses

Comment Related to Over-the-Counter Data Standards

Document: ED-2013-ICCD-0128-0005

Name: Jenny Grant Rankin, Ph.D.

It is paramount that the data system adhere to Over-the-Counter Data Standards, which relate to how the data is communicated (e.g., report design) to educators/stakeholders. Most educators misunderstand data generated by data systems, and these research-based standards help ensure the data is displayed/supported properly. Such research has been the focus/obsession of my career and research, so I know that educators and students will significantly benefit from IPEDS adherence to Over-the-Counter Data Standards. I humbly ask that you look into using them. Thank you for all you are doing to help students.

RESPONSE:

Dear Dr. Rankin,

Thank you for your comments submitted during the second 30-day review process, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

The National Center for Education Statistics (NCES) is committed to adhering to the statistical standards established through the federal statistical community and those established with NCES and the Department. A description of the statistical standards program at NCES can be found here: <http://nces.ed.gov/statprog/>. A history of the standards used by NCES and the history of their development can be found here: <http://nces.ed.gov/statprog/2002/stdintro3.asp>.

Sincerely Yours,

Richard J. Reeves
Program Director, Postsecondary Institutional Studies Program

Comments Related to Reporting by Title IV Programs

Document: ED-2013-ICCD-0128-0006

Name: Robert Kelchen

I would like to see IPEDS include graduation rate data for Pell Grant recipients, something which colleges are already required to disclose under the most recent HEOA reauthorization. This information is currently being collected from colleges by US News, but is not publicly available. The addition of Pell graduation rate data to IPEDS shouldn't result in a meaningful additional burden to institutions, but would provide useful information to students, their families, and policymakers alike. For that reason, IPEDS should include the data as soon as possible.

An additional, but less important, request would be to include the numbers of students in each income category (e.g. 0-30k) in the IPEDS Data Center instead of just in the institutional reports. This would make comparing the percentage of students from low-income families across colleges much easier. All this takes is a change in the Data Center, as the information is already required to be reported by colleges.

Thank you for your time and consideration.

Robert Kelchen, Seton Hall University (opinions my own)

Document: ED-2013-ICCD-0128-0008

Name: Sarah Gomez

Pell-recipient-specific graduation rates are absolutely necessary in order to counsel our low-income, first-generation KIPP students to build a strong wishlist of schools, and ultimately to make the decision on where to enroll. While we currently can quickly locate overall graduation rates and 6-year minority completion rates as well as the percent of students on campus receiving Pell grant money, the graduation rate of those students specifically would be the final piece in the puzzle as to whether that particular school is serving KIPP-like students well. Since there are thousands of students out there who share the same characteristics as our KIPPsters, this information should be made widely available so that folks have it at their fingertips when making this important decision.

Document: ED-2013-ICCD-0128-0009

Name: Ruben Anonymous

Pell Grant Data should be released there is no reason not to share it. many program could benefit from this data. This is America. Lets make this happen.

Document: ED-2013-ICCD-0128-0010

Name: Torin Hayes

Please collect and publish graduation rates for students receiving Pell Grants!

Document: ED-2013-ICCD-0128-0011

Name: Kristin Anonymous

I am in favor of collecting graduation rates from each institution for Pell recipients through IPEDS! This is vital information for students to know and understand - please make it a priority!

Document: ED-2013-ICCD-0128-0012

Name: Anonymous

Collect graduation rates from each institution for Pell recipients through IPEDS

Document: ED-2013-ICCD-0128-0013

Name: Linda Jensen

An institution's Pell student graduation rate is a key piece of information that low-income students should consider before they apply to colleges. In order to make a well-informed decision, students need to know how many Pell students an institution enrolls and how many it graduates. Institutions should be held accountable for this information.

Document: ED-2013-ICCD-0128-0014

Name: Sarah Magnelia

As a college counselor to low-income students, it would be a great asset to me (and my students!) if colleges were required to publicly report their graduation rates for PELL-eligible students. Students need to ensure that they're attending institutions where they are likely to persist and graduate. In the long run, one semester or year of college does little to help students. A college degree - not some time spent in college - leads to more job security, greater wealth, better health, etc. As such, students need to ensure they're making smart post-secondary decisions, that they are attending schools where they are likely to persist. Graduation data for PELL-eligible students would help my students make these decisions.

Document: ED-2013-ICCD-0128-0015 and ED-2013-ICCD-0128-0018

Name: Margaret Maudsley

I was doing a project for a data analysis class last Summer 2013 and am working currently on a Master's thesis about Pell and graduation rates. I found it very difficult to gather the data I wanted in IPEDS for this topic. I wished that the data was submitted every year, but then as I thought about it, it would be very difficult to ensure that each institution was submitting data for each student as a case every year, to ultimately get the graduation rate for a student receiving Pell at any time during their program. Pell eligibility requirements change every year and a student's EFC also fluctuates yearly. So, I am not sure how accurate, or how much time and effort would need to go onto matching each students' data from each year. But I hope to be doing it manually very soon at my university.

Document: ED-2013-ICCD-0128-0016

Name: Simon Moore

I am writing to strongly urge the Department of Education to require that colleges collect and report completion rates for Pell Grant recipients. As the director of a non-profit college access organization that supports disadvantaged students to enter, succeed in, and graduate from college, I can attest that this information would be instrumental in supporting our families to make informed college choices that promote completion. Thank you for your consideration.

Document: ED-2013-ICCD-0128-0017

Name: Emily Rodriguez

I am writing to strongly urge the Department of Education to require that colleges collect and report completion rates for Pell Grant recipients. As the program director of a college success program that supports disadvantaged students to persist and graduate from college, I can attest that this information would be instrumental in supporting our families to make informed college choices that promote completion. Thank you for your consideration.

Document: ED-2013-ICCD-0128-0019

Name: Carolyn Beyers

Submitter's Representative: Carolyn Beyers

Organization: On Point for College

Students thrive where there are other students who are uniquely different like them and face the same kind of challenges. Published graduation data will help students and College Access Programs know which institutions are sensitive to those unique barriers, and therefore, help students achieve their academic and life goals.

Document: ED-2013-ICCD-0128-0020

Name: Lenna Sliney

The inclusion of Pell graduation rates is essential, but I also urge that graduation rates for all Title IV programs be integrated into IPEDS. The inclusion of this data will allow students to find schools that are successful in graduating students similar to themselves. The data is already collected for Pell, but not publicly available. Therefore, it can be assumed that there would be no additional administrative burden to include Pell graduation rates.

Document: ED-2013-ICCD-0128-0021

Name: Sharon Thomas Parrott

To Whom It May Concern:

DeVry Education Group believes that reporting the graduation rates of Pell grant recipients via IPEDS would be important and necessary information to policy makers and the general public. While this data is currently only required to be disclosed on an institution's website, or if asked, we do not believe it would pose an undue burden on either the Department or respondents to make this data more fully available through IPEDS.

Collecting this data is only the first step toward gaining meaningful insights into institutional performance. Graduation rates of Pell grant recipients should be examined in context against a predicted range of outcomes for institutions based on their percentage of Pell recipients. Whether or not a student has received a Pell grant is highly correlated to their eventual graduation, therefore colleges with a high percentage of Pell grant students should be viewed alongside peer institutions with similar demographics.

For example: institutions with 5% Pell students would have a predicted range of graduation rates that would be much different than colleges with 50% of its students receiving Pell grants. An institution with a seemingly low graduation rate could have a very high percentage of Pell recipients and might actually be graduating students at or above its predicted rate. Such information would be valuable to the Department and policy makers in evaluating the performance of institutions and their efficient use of taxpayer dollars. This information would also allow students, especially those pursuing career-focused education, more relevant insights than graduation rates currently provide.

In short, DeVry Education Group recommends that the Department, through IPEDS, collects information on an institution's Pell grant graduation rate, rather than merely disclosing such information as per current HEA requirements.

Sharon Thomas Parrott
SVP External Relations & Global Responsibility
Chief Regulatory Compliance Officer, DeVry Education Group

Document: ED-2013-ICCD-0128-0025

Name: New America Foundation Education Policy Program

New America Foundation IPEDS Comments 11-14-2013
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Kate Mullan, Acting Director, Information Collection Clearance Division
Privacy, Information and Records Management Services, Office of Management
U.S. Department of Education
400 Maryland Ave SW, Washington, DC 20202

Dear Ms. Mullan,

Thank you for the opportunity to submit comments on the information collection request for the 2013-16 Integrated Postsecondary Education Data System (IPEDS). The IPEDS database is the most crucial and best-maintained repository of information on U.S. higher education. The proposals from the National Center for Education Statistics (NCES) to include new outcomes measures stemming from the Committee of Measures of Two-Year Student Success will only make it more so. Issues around how those measures will add reporting on part-time and nonfirst-time students have been well discussed, so the comments submitted today only consider the graduation rate disaggregation requirements that Congress added in Sec. 488(a)(3) of the 2008 Higher Education Opportunity Act and are now codified in Sec. 485(a)(7)(A).

Under that section, institutions of higher education must disclose to prospective students information on the graduation rate of students, disaggregated by a number of categories including gender, major racial or ethnic subgroup, Pell Grant recipients, students who borrowed a Subsidized Stafford Loans and did not receive a Pell Grant, and students who received neither a Pell Grant nor a Subsidized Stafford Loan. The first two types of disaggregation—race and gender—are already recorded annually on the IPEDS completion survey, but the other elements are not. We strongly recommend that NCES take steps to add in elements to the IPEDS completions survey that require colleges to report graduation rates for Pell recipients, Subsidized Stafford Loan recipients without Pell Grants, and individuals who received neither Pell Grants nor Subsidized Stafford loans. While we

understand that past comments on this information collection have also made this request and received a negative response, there are additional issues worth highlighting for the first time or reiterating that we think make clear why this is a sensible change.

There is no added burden for schools because they are already required to furnish this information: Burden is understandably an issue frequently raised by institutions that are concerned about the cost of complying with IPEDS. But unlike the additional outcomes measures or changes to other things like for-profit finance, these completion rates would not increase the burden faced by schools. That is because they are already legally required to provide this information on a website or to individuals who ask for it. Since this information is already supposed to be collected and disclosed, simply adding additional fields to IPEDS would have at most a minimal effect on burden.

Many schools are already reporting this information on other surveys: The publication U.S. News and World Report already asks for these graduation rates on the surveys it sends to institutions for its annual rankings. It has published small pieces of this information on its blog, which it is labeling as exclusive and not sharing. (See <http://www.usnews.com/education/blogs/college-rankingsblog/2013/10/17/measuring-colleges-success-graduating-low-income-students>, for example.)

The fact that many colleges are already reporting this information on other surveys reiterates how this expansion of the completion rate survey will not add additional burden. It also shows that a provision Congress intended to help lower-income students make better decisions is instead being held by other organizations for proprietary purposes, a condition that only NCES is capable of fixing.

Schools are making it hard for students to get this information: Despite being required by law to comply with this graduation rate disaggregation, many colleges are not being forthcoming in giving students these legally mandated data. A 2011 survey of 100 schools by Kevin Carey and Andrew Kelly found that only 38 percent even complied with the requirement to provide these completion rates, in many cases only after repeated phone calls and messages.¹ Forcing students to go through multiple rounds of contact with an institution in order to get this information is unduly burdensome on them and risks allowing colleges to skirt their legal requirements.

These data are necessary for Michelle Obama's push on college completion: First Lady Michelle Obama gave a policy speech on November 12 that talked about the importance of college going for low-income students. She also emphasized the importance of choosing the right college and that students should strive to pick more challenging ¹ Kevin Carey and Andrew Kelly, "The Truth Behind Higher Education Disclosure Laws," Education Sector, November 2011, <http://www.educationsector.org/publications/truth-behind-higher-educationdisclosure-laws>. institutions—a policy goal also endorsed by a meeting of high-level presidential advisers that same day. ²

The call for a focus on college selection is based upon multiple research studies that have shown how a large number of low-income students end up choosing colleges where they are not as likely to graduate as other options, and that those who pick colleges for which they are academically overqualified are less likely to graduate than their peers who pick institutions for which they appear underqualified. But there are limited available resources to address this problem because students can only be presented with completion rates overall or by race and gender. There is no way to tell low-income students about where they are more likely to finish. This is particularly important if one of the barriers for poorer students to choosing a college is fear of high sticker price. Making this information centrally available would make it possible to add it to future iterations of the College Scorecard and empower other direct service organizations to get these data in front of students. The result

would be better college choices and greater rates of completion that are aligned with the First Lady's goal.

These data will be crucial for the President's proposed ratings system: The centerpiece of President Obama's plan for postsecondary education is to create a ratings system and ask Congress to tie it to student financial aid. Knowing the success rate of students receiving some of the \$150 billion in federal student aid is a crucial element for building this system properly, especially to ensure that colleges are adequately serving low income students. Without adding these data to IPEDS, neither the Department nor anyone else will be able to produce these data, potentially ruining or severely limiting the entire ratings system push.

These graduation rates cannot be done through the National Student Loan Data System (NSLDS): In previous responses to commenters, NCES noted that changes made to NSLDS will make it possible to calculate Pell Grant graduation rates without needing to resort to institutional reporting. Unfortunately, our understanding of changes to NSLDS suggests this would at best be an incomplete solution for Pell Grant graduation rates and is not a feasible solution for other required measures.

For Pell Grant graduation rates, a completion flag in NSLDS will not solve issues of properly constructing a cohort of recipients for the purposes of determining whether or not someone finished in a given amount of time, since students may not get Pell Grants in their first year or may not receive them each year until they finish. And even if a Pell 2 Michael Statford, "The Obamas' New Focus," Inside Higher Ed, November 13, 2013, <http://www.insidehighered.com/news/2013/11/13/michelle-obama-speech-signals-new-administrationfocus-boosting-low-income-college>. recipient cohort could be constructed, it would not be comparable to any other completion cohort, limiting its value for comparison purposes. Finally, because NSLDS only contains information on federal student aid recipients it would not be able to calculate the required graduation rate of students who did not receive a Pell Grant or a Subsidized Stafford Loan.

These data could be calculated using existing cohorts that institutions already report: Though we understand that there has not been a technical review panel on the best way to calculate these measures, colleges could presumably formulate these numbers with the existing cohort used to calculate graduation rates under the Student Right to Know Act (SRKA). An institution could take the denominator it already uses for calculating graduation rates under SRKA and then select the subset of students within that group that received a Pell Grant, a Subsidized Stafford Loan and no Pell Grant, or neither of those forms of aid in their first year.³ It could then calculate the completion rate for these subsets by looking at how many of them show up in the numerator of the SRKA graduation rate. This process would only require checking a roster of names against aid receipt information and leaves the vast majority of the legwork around cohort construction to existing and well understood processes.

A Compromise Solution: Require URL Reporting

We understand that adding items to IPEDS usually involves holding a technical review panel and following a number of steps before variables are added to the surveys. At the same time, colleges have been required to make these data available for years and waiting an indeterminate amount of time for them to properly comply with a federal law seems unreasonable. Therefore, we recommend NCES balance the concerns around timing, burden, and consumer need by taking two steps. First, add in a requirement for institutions to provide through IPEDS a URL for the location where their fulfillment of these three graduation rates can be obtained immediately for the next IPEDS reporting period. The added burden of including this URL would be minimal, since it is a single item that does not require any calculation by the institution. This is not unusual IPEDS practice—colleges already have to report the web link for their net price calculators, for example. While only

knowing the website where information is stored is not ideal, it does provide a way to simply give the public information on where a college is fulfilling its legal requirement without adding more work.

Second, we ask NCES to add these graduation measures to its schedule of technical review panels. Adding it to the agenda will start the process for adding all of these completion rates— and not just the ones for Pell Grant recipients—into IPEDS.

Fulfill Congressional Intent

The conference report accompanying the Higher Education Opportunity Act noted that Congress added the disaggregation requirements because it believes they “will yield important information regarding the degree to which different types of students are completing postsecondary education programs.”⁴ Clearly Congress thought this information was important to put in the hands of consumers, which is why it kept this provision in the bill after a decade’s worth of work, specified that students should have access to it, and called for an entire special committee to meet over several years to make sure the rates were fair to two-year colleges.

Adding these rates into IPEDS is the single best way to ensure that Congressional intent is carried out.

Thank you in advance for your consideration.

Sincerely,

The Education Policy Program
New America Foundation

4 HEOA Conference Report, Page 550:

<http://www.gpo.gov/fdsys/pkg/CRPT-110hrpt803/pdf/CRPT-110hrpt803.pdf>

Response-Title IV

Dear Mr. Gonzalez, Ms. Gomez, Ms. Hayes, Ms. Jensen, Ms. Magnelia, Ms. Maudsley, Mr. Moore, Ms. Rodriguez, Ms. Beyers, Ms. Sliney, Ms. Parrott, and anonymous commenters,

Thank you for your comments submitted during the second 30-day review process, responding to a request for comments on proposed changes to the Department of Education’s Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

Your suggestions for collecting data to calculate cumulative debt at graduation and graduation rate information for Pell recipients have been discussed at past meetings of the IPEDS Technical Review Panel (TRP) and the National Postsecondary Education Cooperative (NPEC), and have been carefully considered by NCES. Currently, much of this information is available at a national level through the National Postsecondary Student Aid Study (NPSAS) and its associated postsecondary longitudinal sample surveys. The Department of Education also feels that these are important data to have at the institutional level—Federal Student Aid (FSA) has already begun to make changes to the National Student Loan Data System (NSLDS) in order to provide this information in the future. Adding items to collect this information through IPEDS would be duplicating efforts both for the Department of Education and for the Title IV institutions reporting this information. Further, IPEDS would not be able to provide these data any sooner than it is expected to be available from the National Student Loan Data System (NSLDS).

Sincerely Yours,

Richard J. Reeves
Program Director, Postsecondary Institutional Studies Program

Comment Veterans

Document: ED-2013-ICCD-0128-0029

Name: Anonymous

We write to commend the Education Department for its proposals to improve its Integrated Postsecondary Education Data System (IPEDS) data collection.

First, we support the Department's proposal to expand its database beyond "first-time, full-time" students by collecting information on returning (i.e., "non-first-time") and part-time students similar to the information collected on first-time, full-time students. This is an important and long overdue change. Many students, including veterans, attend college part-time, and many return to college after military service or another break.

Second, we support the Department's proposal to collect and make available data on veterans and military education assistance, especially:

- The Post-9/11 GI Bill
- Yellow Ribbon Program
- Credit for military training
- Dedicated point of contact for support services for veterans, military service members, and their families
- Recognized student veteran organization on campus
- Member of the Service members Opportunity Colleges
- URL for tuition policies specifically related to veterans and military service members
- Number of students receiving Post-9/11 GI Bill benefits and the total dollar amount of tuition and fee benefits awarded to them through the institution
- Number of students receiving DoD Tuition Assistance and the total dollar amount of DoD Tuition Assistance awarded to them through the institution

We concur with the Department's IPEDS Technical Review Panel recommendation that these data points are "necessary for policy-making and analysis and to improve information available to veterans and military service members considering postsecondary education."

In addition to capturing the data on students' completion, retention, and graduation, the Department should also collaborate with the Departments of Defense and Veterans Affairs to make available more comprehensive data on the total dollar amounts and number of students utilizing G.I. Bill and military education aid. Please also ensure collection and cross-reference of VA facility codes (school code numbers) for GI Bill to ensure VA is able to regularly update its institutional crosswalk with the Department of Education, which is necessary to comply with the requirement in P.L. 112-249 and Executive Order 13607 that VA develop a school comparison tool for college-bound veterans.

Third, we support the Department's decision to require for-profit colleges to submit the same data as non-profit colleges. We also support the Department's proposal to disaggregate the data on expenses. A key data point is instructional expenses versus other costs. We agree with the Department's rationale that this proposed change will increase data comparability across institutional sectors. More transparency is needed than exists today, not less.

Finally, please consider collecting data on students' debt upon graduation. Students' debt load is a key factor and is needed for full transparency to help students choose a college. As you may know, even students using the G.I. Bill may take on debt.

Thank you.

Signed,

Association of the U.S. Navy
Iraq & Afghanistan Veterans of America
Initiative to Protect Student Veterans, University of San Diego Law School
National Guard Association of the U.S.

Paralyzed Veterans of America
Student Veterans of America
Veterans Education Success
Veterans for Common Sense
Veterans Student Loan Relief Fund
VetJobs
VetsFirst, a Program of United Spinal Association
Vietnam Veterans of America

Document: ED-2013-ICCD-0128-0022

Name: Steve Gonzalez

**The
American
Legion**



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November 14, 2013

Kate Mullan
Acting Director, Information Collection Clearance Division
Privacy, Information and Records Management Services
Office of Management
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Dear Ms. Mullan,

On behalf of the 2.4 million members of The American Legion I thank you for this opportunity to submit The American Legion's comments on the information collection request for the 2013-16 Integrated Postsecondary Education Data System (IPEDS). The IPEDS database is the most crucial and best-maintained repository of information on U.S. higher education. The initiative from the National Center for Education Statistics (NCES) to ask six specific questions through which institutions of higher learning would report additional information to the Integrated Postsecondary Education Data System (IPEDS), as well as changing the scope of graduation rate tracking to include part-time students.

We strongly recommend that NCES add in elements to the IPEDS completions survey and require colleges to report graduation rates for military and veteran students, disaggregate the outcome measures by credential type, include better information on transfer, move towards student-level reporting, require institutions to report graduation rates by military status to IPEDS, number of students receiving GI Bill benefits and the total dollar amount of tuition and fee benefits awarded to their institution, number of students receiving Department of Defense (DOD) Tuition Assistance and the total dollar amount of DOD Tuition Assistance awarded to their institution. While we understand that past comments on this information collection have also made this request and received a negative response, there are additional issues worth either highlighting for the first time or reiterating that we think makes clear why this is a sensible change.

- *There is no added burden for schools because they are already required to furnish this information:* Burden is understandably an issue frequently raised by institutions that are concerned about the cost of complying with IPEDS. But unlike the additional outcomes measures or changes to other things like for-profit finance, these completion rates would not increase the burden faced by schools. Since most of this information is already

supposed to be collected, simply adding additional fields to IPEDS would have at most a minimal effect on burden.

- *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) or laterally (e.g. two-year to two-year). This distinction will provide a far more robust understanding of student movement throughout the postsecondary system.
- *Move towards student-level reporting*. Although this is not currently within the authority of IPEDS or the U.S. Department of Education to enact, we support shifting from institution-level reporting to student-level reporting to produce more thorough and comprehensive information that could be customized for key constituencies.

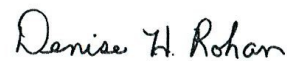
- *Require institutions to report graduation rates by military status to IPEDS.* Institution-level data on the success rates of service men and women are unavailable, and IPEDS is the best tool available to collect this information.
- *These data will help improve college completion:* Multiple research studies have shown that a large number of military and veteran students end up choosing colleges where they are not as likely to graduate as other options. This is particularly important if one of the barriers for military and veteran students to choosing a college is fear of high sticker price. Making this information centrally available would make it possible to add it to future iterations of the College Scorecard and empower other direct service organizations to get these data in front of students. The result would be better college choices and greater rates of completion.
- *Crosswalk:* institutional crosswalk is critical to ensuring military and veteran students have access to quality information before choosing an academic institution. Department of Veteran Affairs (VA) is on the cusp of launching its ground-breaking institutional comparison tool, which relies on the accuracy of this institutional crosswalk, before the end of the calendar year. This tool will allow military and veteran students to better understand the characteristics of the schools they plan to attend in only one click, without having to navigate 17 specific web sites across three federal agencies like they must today. Specific IPEDS collection clarifying VA facility codes will enable VA and

Department of Education to regularly update their institutional crosswalk to offer quality, up-to-date information to veterans through the comparison tool in compliance with P.L. 112-249.

A compromise Solution: Understanding the needs to balance timing, burden, and the like, we suggest a middle-ground alternative. Require reporting colleges to include a URL for the location where their fulfillment of these graduation rates can be obtained immediately for the next IPEDS reporting period. This requirement would entail no burden whatsoever and is in keeping with the treatment of how schools already report things like their net price calculator link into IPEDS. Institutions could then be given time to formally add the completion rates into IPEDS, with an understanding that the Department will provide that information for them if it is possible to do so through NSLDS. This option thus allows institutions to simply give the public information on where they are fulfilling the legal requirement they are already supposed to be carrying out without adding more work for them immediately.

We thank the Department of Education for taking into consideration our recommendations and working to improve the collect of and distribution of information available to America's military and veteran students.

Respectfully,



Denise Rohan, Chairman
National Veterans Employment
& Education Commission

Response-Veterans

Dear Ms. Rohan,

Thank you for your comments submitted during the second 30-day review process, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your

interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

NCES appreciates your comment regarding the desire to have IPEDS collect completion and retention data on veterans and service members in addition to the other proposed items. The November 2011 IPEDS Technical Review Panel (TRP) ([TRP # 36, Collecting Data on Veterans](#)) on this topic discussed the possibility of adding completion and retention information for veterans and service members, however the panel ultimately concluded that IPEDS is not the appropriate instrument for collection of this information. Given that service members are a particularly transient population due to the nature of their work, an institution level data collection such as IPEDS would not effectively capture their educational activity since it does not capture the movement of individual students between institutions. ED continues to work closely with the Department of Veterans Affairs (VA) and the Department of Defense (DoD) as they refine their existing data systems to provide this information.

With respect to your comment about the need for a definitive crosswalk between the various institutional identifiers to aid in integrating data from NCES, the Office of Federal Student Aid (FSA), and the Office of Postsecondary Education (OPE), NCES has begun working on creating such a crosswalk.

Your suggestions for collecting data to calculate cumulative debt at graduation and graduation rate information for Pell recipients have been discussed at past meetings of the IPEDS Technical Review Panel (TRP) and the National Postsecondary Education Cooperative (NPEC), and have been carefully considered by NCES. Currently, much of this information is available at a national level through the National Postsecondary Student Aid Study (NPSAS) and its associated postsecondary longitudinal sample surveys. The Department of Education also feels that these are important data to have at the institutional level—Federal Student Aid (FSA) has already begun to make changes to the National Student Loan Data System (NSLDS) in order to provide this information in the future. Adding items to collect this information through IPEDS would be duplicating efforts both for the Department of Education and for the Title IV institutions reporting this information. Further, IPEDS would not be able to provide these data any sooner than it is expected to be available from the National Student Loan Data System (NSLDS).

Thank you again for your comments and your interest in the IPEDS data collection.

Sincerely,

Richard J. Reeves
Program Director, Postsecondary Institutional Studies Program

Comments-Cohorts and Duration

Document: ED-2013-ICCD-0128-0007

Name: Tod Massa

Data collections should be expanded to include graduation rates for each Title IV program, for full and part time students, new and transfer. Students should be tracked for 10 years. Additional sub-cohorts of veterans, gender, race/ethnicity, family income ranges at entry, and prior academic achievement should also be included.

Ideally, these cohort reports would include ALL levels of students, undergraduate and graduate with term-based enrollment/completion status. This would allow elimination of the Fall Enrollment, Completions, and GRS Surveys as the same data could be derived from properly constructed cohort reporting.

An example can be found at <http://research.schev.edu/?xIXP>

Admittedly, this would be easier and more cost effective to do with a national unit record collection, particularly as envisioned in the Student Right-to-Know Before You Go Act (Wyden, Rubio, Warner).

Another solution, that could be very effective and cost efficient, would be to create partnership arrangements with states. Most states have postsecondary longitudinal unit record systems that cover most students in the state. These states could develop and submit aggregate cohort tracking reports with relative ease and submit those on behalf of the institutions.

Institutions not in a state's collection could chose to join the collection or that of another provider. Multi-state

collaboratives could also be developed.

Basically, IPEDS is inadequate and burdensome for today's needs. We need to fundamentally rethink its structure. If moving to a unit record system is not possible, we should move to a consolidated cohort model that would eliminate existing surveys and allow institutions to focus on just one model of data aggregation and submission - a model that would probably improve the focus of their own analysis for improved retention.

Document: ED-2013-ICCD-0128-0024

Name: Kent Phillippe

Ms. Kate Mullan,

We are writing in response to the request for comments on the Agency Information Collection Activities; Proposals, Submissions, and Approvals; Extension of Public Comment Period. Our comments can be found in the attached document.

Kent A. Phillippe



On behalf of the American Association of Community Colleges (AACC) and the more than 1,100 institutions we represent, I appreciate the thoughtful response and consideration that was given in developing the proposed changes to the IPEDS Outcomes Measures following our comments in the last round of review. However, AACC does not support the changes as recommended.

The inclusion of only one outcome measure at six years (graduation) is not a change AACC can endorse, and AACC continues to request NCES collect all of the outcome measures after a six-year, not eight-year tracking period, as is currently proposed. To put our position in better perspective, AACC would like to highlight the history and rationale for the new measures.

The newly proposed measures are the result of recommendations from the Committee on Measures of Student Success. The charge to this committee was “The Committee on Measures of Student Success will develop recommendations for the Secretary of education regarding the accurate calculation and reporting of completion or graduation rates of entering certificate- or degree-seeking, full-time, undergraduate students by two-year degree-granting institutions of higher education. The Committee may also recommend additional or alternative measures of student success that are comparable alternatives to the completion or graduation rates of entering degree-seeking full-time undergraduate students, taking into account the mission and role of two-year degree-granting higher education institutions.”

The recent proposal of alternate measures does not meet the standard of “taking into account the mission and role of two-year degree-granting institutions”.

First, by only adding the graduation at six years, NCES is perpetuating a long held issue the community college sector has had with outcomes reporting by NCES—the failure to recognize the importance of transfer when reporting outcomes. In fact, the Student Right to Know legislation and regulations specifically include transfer as part of the completion measures defined. The proposed new data collection is clearly identified as “Outcome Measures” and to single out one measure (graduation) at a specified period minimizes the importance of the

other mission appropriate measures. As a result, the inclusion of only graduation at a six-year time period is not a solution AACC can endorse.

Second, AACC maintains that measures for community colleges do not need to be the same as those used for other sectors, and that the one size fits all approach will not best serve the interests of the colleges in measuring their ability to meet their mission and role in higher education.

At no point does the charge of the commission specify that they are to develop measures for all of higher education. Of particular note, the charge to this commission specifically states that it was to develop alternate measures “taking into account the mission and role of two-year degree-granting higher education institutions.” It is troubling that NCES is choosing to proceed with measures that ignore this specific charge given to the commission, in favor of using the argument that “The creation of a single output measure for postsecondary education has great value to institutions of higher education for institutional research and improvement, prospective students and their families for decision-making about postsecondary education, and policymakers for guiding efforts to improve student outcomes and success in higher education.”

AACC recognizes the desire for a Federal statistical agency to develop measures that are appropriate to all of higher education. However, AACC cannot support this when it clearly goes against the desires of a specific sector, and ignores the original intent and rationale for the development of these measures. In the response it is stated that “Alignment with other measures like the VFA does not directly fit within the Department’s responsibility for this measure.” AACC acknowledges that NCES is not responsible for aligning measures with outside organizations; however, ignoring the desires of a sector to provide measures that the sector believes are mission and role appropriate is antithetical to the original intent of developing these measures.

Community colleges have come to agreement on using a six-year cohort as the most mission appropriate timeframe for tracking outcomes for community college students, and this is being implemented in a wide variety of settings, not just the VFA. It is true, as stated in the recent response to comments that “... the additional 2 years allows for more students, particularly those attending part-time, to be captured as completers in the OM component.” However, community colleges believe that a six-year time frame is more appropriate for policy and decision making for assessing outcomes for community college students given their mission and roles, and that eight years will not be acceptable to many state and local policy makers.

AACC strongly encourages NCES to collect all the outcome measures at the end of a six year tracking period—this will be consistent with current practice in accountability for community colleges in a wide range of settings, including the Voluntary Framework of Accountability in which more than 140 Community college have participated, the California Scorecard with more than 110 community colleges, the National Community College Benchmarking project with over 250 community colleges, and many other state accountability reporting systems. AACC strongly encourages NCES to consider the mission and role of two-year degree granting institutions as was the charge of the Committee on Measures of Student Success, and allow a different standard for reporting outcomes that are endorsed by the sector rather than imposed as a ubiquitous measure for utility sake.

Kent A. Phillippe

Associate Vice President, Research and Student Success, American Association of Community Colleges

Response-Cohorts and Duration

Dear Mr. Massa and Dr. Phillippe,

Thank you for your comments submitted during the second 30-day review process, responding to a request for comments on proposed changes to the Department of Education’s Integrated Postsecondary Education Data System

(IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

Your comments on the length of time a cohort should be tracked represent two of three distinct perspectives that have been conveyed to NCES during this comment process. Respondents have requested 6-, 8-, and 10- year outcomes. Rarely does a requester indicate a different cohort tracking duration than one of those three. NCES has selected to report final outcomes based on an 8-year tracking model for outcomes measures. There will be a place for institutions to report the counts of students that received an award at the 6-year point in time as well. We believe this method represents the best measure for student outcomes.

The concept of state level coordination is a valid suggestion and NCES is very sensitive to the need to balance increased reporting burden with the utility of the data requested. Each Technical Review Panel meeting, regardless of the topic being discussed, is specifically charged with the task of minimizing the additional institutional burden as a result of increased IPEDS reporting requirements. Further, entire meetings of the IPEDS Technical Review Panel have been dedicated to the topic of IPEDS reporting burden:

- [TRP #41, Managing Reporting Burden](#) (March 2013)
- [TRP #30, Tools and Resources for Reducing IPEDS Burden](#) (March 2010)

Some states do submit data for the institutions that are represented by the state higher education agency or coordinating authority. Often the institution then verifies and locks this information. However, not all states have a central office that is established for federal reporting. At this time, state level coordination of reporting is voluntary.

The present structure of IPEDS reporting satisfies current legislative and regulatory requirements. Movement to a cohort reporting model with more subgroups, or a unit record model, would require additional study and, in some cases, changes in law.

Sincerely Yours,

Richard J. Reeves
Program Director, Postsecondary Institutional Studies Program

Comment Organization: IHEP, CLASP, DQC, NCAN, College Board, Chamber of Commerce, SHEEO

Document: ED-2013-ICCD-0128-0023

Name: Mamie Voight

Submitter's Representative: Mamie Voight

Organization: IHEP, CLASP, DQC, NCAN

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 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) 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,¹ 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.

1 “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>
2 “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

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 service members. 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 2010.² 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) service members, 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.

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, 202-587-4967)

Sincerely,

Michelle Asha Cooper, Ph.D. Jennifer Engle, Ph.D.
President Vice President for Policy Research, Institute for Higher Education Policy
Julie Strawn Aimee Guidera
Senior Fellow Founder and Executive Director, Center for Law and Social Policy Data Quality Campaign
Kim Cook
Executive Director, National College Access Network

Document: ED-2013-ICCD-0128-0027

Name: Karen Lanning

Dear Ms. Mullan,

Thank you for the opportunity to provide feedback on the data collection request. As a non-profit membership association working on educational issues across the secondary and post-secondary continuum, the College Board is grateful for the opportunity to provide feedback that can help to improve the Department of Education's data collection efforts.

Our comments center on two major areas:

- Graduation rates
- Student transfer and mobility patterns

These recommendations are intended to increase our collective understanding of how different students navigate the higher education system and to improve the data available to students and families as they make the important decisions of where to apply and enroll in college.

Graduation Rates for Pell Grant Recipients:

The Pell Grant program is considered the nation's bedrock federal student aid program and has received widespread support from both political parties in Congress. However, because of the recent increases in program costs and lack of clear evidence associated with post-secondary outcomes for Pell Grant recipients, there is an urgent need for data to demonstrate the impact of this important program.

Further, capturing and publicly reporting graduation rate data disaggregated by Pell Grant status will help students and families make more informed college enrollment decisions. It will enable students from low-income families in particular to personalize the data and thereby gauge their chances of success in the context of graduation rates of students from similar financial backgrounds. Because a majority of institutions currently report these data to other entities, we do not believe this reporting requirement will pose an undue burden on institutions.

With approximately 8.8 million Pell Grant recipients attending U.S. institutions and the 2012-2013 expenditures hovering around \$32 billion, measuring the extent to which this investment leads to positive outcomes is essential to informing public policy and cannot be accomplished without more complete and disaggregated data for Pell Grant recipients.

We recommend that institutions be required to report graduation rates for Pell Grant recipients.

Graduation Rates By Military Status:

Military service members and veterans are an important and increasing segment of our postsecondary student population. Therefore, IPEDS should disaggregate graduation rates by military status. Members of the military and their families deserve the opportunity to make informed choices on where to best use the benefits they have earned through their military service. Disaggregating the data to show the outcomes of various military student populations (full-time/full-year, part-time, etc.) will indicate at which institutions these students are most likely to be successful.

Although we suggest that military students be tracked similarly to non-military students, we recognize that their mobility patterns differ from those of other students. Because members of the military often enroll in one college, change service stations, deploy and re-deploy, the Department of Education should carefully evaluate and determine the best metrics to track their postsecondary success.

We recommend that institutions be required to report graduation rates for military service members and veterans.

Student Mobility and Transfer Patterns:

According to the National Student Clearinghouse Research Center, approximately one in five students who complete college do so at an institution other than where they started. While this may speak to a student's ability to move throughout the higher education system, our current reporting methods do not allow for accurate tracking of these student mobility patterns.

Efforts to improve institutional reporting, such as the Student Achievement Measure Project (www.studentachievementmeasure.org) put forth by the six higher education presidential associations, are a major start. However, they fail to capture the number of transfer students and the direction in which they transfer— from a 4-year institution to a 2-year institution, a 2-year institution to a 4-year institution, or laterally. This missing piece of data is an important one, as the direction of student transfer provides a more accurate picture of what happens to students beginning at a particular institution. Several initiatives are currently reporting transfer data with this level of detail, so the reporting should not be an additional burden to institutions.

We recommend that institutions be required to include details on transfer students, including whether they transfer from a two-year to a four-year institution or another two-year institution, or from a four-year institution to a two-year institution.

Sincerely,
Karen Lanning
Senior Director, Federal Relations, The College Board

Document: ED-2013-ICCD-0128-0028

Name: Jaimie Matthews

Submitter's Representative: Cheryl Oldham

Organization: U.S. Chamber of Commerce

Dear Ms. Mullan:

This letter is in response to the U.S. Department of Education's notice of the Integrated Postsecondary Education Data System (IPEDS) 2013–2016 collection. The U.S. Chamber of Commerce, the world's largest business federation representing the interests of more than 3 million businesses of all sizes, sectors, and regions, as well as state and local chambers and industry associations, and dedicated to promoting, protecting, and defending America's free enterprise system, is pleased that the U.S. Department of Education is seeking input from stakeholders to improve the design and utility of IPEDS data collection.

Given the continuing rise in cost for accessing a postsecondary education—as well as the ever growing skills gap that employers struggle to fill—it is of the utmost importance that we fully leverage the power of data in a system that can benefit from more transparent and actionable information. The Chamber believes that data collected through IPEDS must be significantly improved upon in order to hold institutions accountable and drive institutional improvement, as well as increase transparency for consumers, policymakers, and institutions to make smarter decisions and investments. However, as many of the changes that need to be made to IPEDS have to be made legislatively, the Chamber strongly encourages the Administration to work with Congress in moving these changes through the proper legislative process.

In order to improve upon the accuracy of IPEDS reports, the system must capture additional data colleges and universities are already required to collect, but are not reported through IPEDS. With that in mind, the Chamber recommends that graduation data for all students—including full-time and part-time—are reported. This should include data on Pell recipients, Subsidized Stafford Loan recipients without Pell Grants, and individuals who receive neither. Including this information in IPEDS would be a significant step forward in increasing transparency in the higher education system without imposing additional burdens on institutions. It would also help empower consumers to make smarter, data-informed decisions about their college choice.

In addition to expanding the graduation rate data, the Chamber recommends that IPEDS allow for disaggregating data by credentials, as well as program. Colleges and universities are as diverse within their institutions as they are when compared to one another. To ensure that students make well-informed decisions, they need access to information specific to their academic goals, including the experience of other students seeking a particular credential, as well as what programs they went through.

Special populations, including transfer students, veterans and servicemen and women, should also be included in IPEDS. Given the growing rate of transfer students, the complexity involved in transferring, and the challenges in transitioning a successful transfer into program completion, it is paramount that information pertaining to the experience of this population be reported. Doing so would empower this population with useful information that cuts across institutions.

Along the same lines, ensuring that our veterans and servicemen and women can access and complete a college education—in addition to successfully transitioning to employment—is critical given their sacrifice and the service they provide the nation. Finding ways to better capture the higher education experience of these individuals should be explored to the fullest.

Lastly, the U.S. Chamber would like to call attention to the need for IPEDS to continue to adapt to and grow with innovations taking place in higher education. Currently, there is significant discussion around the need to define and measure postsecondary success through employment. While the Chamber agrees that capturing this data is important, as policies continue to be debated and refined, ensuring that the methodologies and mechanisms used to capture employment data do not create an extra burden on employers is important.

Likewise, the IPEDS system will need to adapt to other disruptive innovations in higher education, such as

competency-based learning and alternative credentialing (e.g. digital badges), that may change how postsecondary institutions are accessed and paid for. These same disruptions would also impact how we define outcomes and success.

The Chamber recognizes and appreciates the U.S. Department of Education's willingness to improve postsecondary data collection, and, as such, improve the higher education experience and outcomes for students. The Chamber also thanks you for the opportunity to submit comments and for your consideration. I may be reached at (202) 463-5525 or coldham@uschamber.com should you have any questions regarding our submission or wish to discuss further.

Sincerely,

Cheryl Oldham
Vice President, Education Policy, U.S. Chamber of Commerce

Document: ED-2013-ICCD-0128-0030

Name: Hans Lorange

Kate Mullan
Acting Director, Information Collection Clearance Division
Privacy, Information and Records Management Services
Office of Management
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

Dear Ms. Mullan,

The State Higher Education Executive Officers (SHEEO) appreciates the opportunity to respond 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.

SHEEO is the national association of state higher education leaders who serve statewide coordinating and governing boards and other state policy agencies for higher education. SHEEO seeks to advance public policies and educational practices to achieve more widespread access and successful participation in higher education, more new discoveries through research, and more applications of knowledge that improve the quality of human lives.

As state higher education leaders, our central preoccupation is in meeting the growing need for advanced educational attainment in the United States. For several years SHEEO has advocated the development of more robust data systems for higher education so state, federal, and institutional leaders can better understand where policies and practices require attention in order to foster greater attainment. SHEEO has a long history of acting as a steward between state level IPEDS keyholders and coordinators and the National Center for Education Statistics (NCES). For almost 35 years, SHEEO did this through a partnership with NCES and our work with this network of state level data providers continues even as this formal partnership has changed.

IPEDS is the most comprehensive source of institutional level higher education data and continues to grow in its role in providing accountability and transparency to the postsecondary education system as well as providing a valuable resource for improving the system. We would like to echo the comments and concerns submitted by other education associations about several of the components of the proposed Outcome Measures. We believe the proposed measures provide an opportunity to collect information that will help improve data driven decision-making, particularly as it relates to some of the most overlooked populations in our postsecondary system. Specifically we would appreciate serious consideration of the following changes:

- Include Financial Aid Status, particularly Pell Status, as a breakout for Outcomes Measures and/or Graduation Rates.
- Align the Outcomes Measures with the existing Graduation Rate Survey to ensure consistency, reduce confusion and reduce reporting burden.
- Include Veteran Graduation Rate data in addition to the other Veteran elements proposed.

Include Financial Aid Status, particularly Pell Status, as a breakout for Outcomes Measures and/or Graduation Rates in IPEDS.

The financial model for funding postsecondary education has transitioned over the previous decade; states appropriations are covering a smaller portion of the cost of college which requires many students to rely more heavily on federal aid and personal resources to fund their education. Additionally, our institutions of higher education increasingly are serving students with very different financial backgrounds and there is some evidence to suggest that student socioeconomic status is a key indicator of their success. As the federal government invests more in students through Pell-grants and subsidized student loans, it becomes increasingly important to understand the success of students receiving that support. Additionally, states have a key interest in ensuring their institutions are serving students who have financial need. Many states and systems have voluntarily entered into data collection efforts from groups such as Complete College America and Access to Success to track the success of these students.

We are disappointed that the current recommendations do not include collecting graduation rates or outcome measures by student's financial aid status. Institutions are already required to calculate these rates under the Higher Education Opportunity Act, and external organizations such as CCA and Access to Success have found that collecting these data add little additional burden to their reporting processes. Although we have heard conversations over the last few years about how these rates may be calculated using the National Student Loan Data System, those efforts have not come to fruition and it's likely that the data provided by this effort would not be comparable to that currently reported in IPEDS, adding additional confusion rather than clarity to the conversation around the effectiveness of the postsecondary education system.

Align the Outcomes Measures with the existing Graduation Rate Survey to ensure consistency, reduce confusion and reduce reporting burden.

The new outcomes measures section introduces an entirely new IPEDS component that examines outcomes different from those currently generated as part of the IPEDS Graduation Rate Survey (GRS). While GRS collects graduation rates at 100%, 150% and 200% of degree-time, the proposed outcomes measures would collect data for students who complete in 6-years and 8-years regardless of what degree they are seeking. These new outcomes measures will be collected for all degree seeking students but will not be disaggregated by degree seeking type. Additionally, this section will collect data on students still enrolled at their current institution, students enrolled at other postsecondary institutions and students who are unknown. Finally, this data will be collected for four cohorts, full-time, first-time students (already collected as part of the GRS survey); part-time, first-time students; full-time, non-first-time students; and part-time, non-first-time students.

Although we are not opposed to adding additional details such as a student's current status within the institution, we are concerned that 1) combining all degree seekers into one cohort and 2) collecting awards based on specific time periods (6-years and 8-years) will lead to confusion when compared to the existing graduation rate data. Many of our state members express challenges when multiple data sources provide conflicting figures on the same topic. Inconsistent data introduces confusion for both lawmakers and consumers. Additionally, it makes it more difficult for education agencies to provide a clear picture of the postsecondary system and its outcomes. As we look to greater accountability for postsecondary institutions and systems, it will be essential to have clear and consistent measures. SHEEO believes new cohorts and slightly different measures could obstruct good efforts for states to help ensure greater accountability.

Rather than introduce an entirely new section, it would likely reduce burden to integrate these new measures into the existing GRS survey, since institutions would not have to define different cohorts and calculate new measures. The three additional students types (part-time, first-time students; full-time, non-first-time students; and part-time, non-first-time students) could be added and students grouped into cohorts based on the degree they are seeking (as is currently done for full-time first-time students). Additionally, the additional outcomes: Did not receive award, still enrolled at reporting Institution; Did not receive award, subsequently enrolled at another institution; Did not receive award, subsequent enrollment status Unknown could be collected at the same time as the 200% graduation rates.

The additional outcomes could be enhanced further by adding more specific breakouts for students enrolled at other institutions. It is helpful to understand student mobility when looking at enrollment in another institution as an outcome. Therefore, this option could be split into: Did not receive award, subsequently enrolled at a four-year institution; Did not receive award, subsequently enrolled at a two-year institution; Did not receive award, subsequently enrolled at a less than two-year institution. This would measure the type of transfer activity of the student.

In addition to the other Veteran elements proposed Graduation rate data should be collected.

Finally, interest is increasing on the effectiveness of institutions as they serve veterans. Although the current proposal recommends collecting a number of elements related to financial aid options available to veterans and veteran enrollment, there is nothing that will help our members understand how well their institutions are serving this population. Again, these students will already be defined as part of earlier reporting components. Reporting on their completion provides valuable information to policy makers about the effectiveness of the funding that we provide these students and the ability of our system to serve them.

Thank you to the department for all your efforts to ensure continuous improvement and modernization to the IPEDS data collection system and thank you for giving us the opportunity to comment on these changes.

Sincerely,



Hans P. L'Orange
Vice President for Research and Information Resources
State Higher Education Executive Officers

Response

Dear Dr. Cooper, Dr. Engle, Ms. Strawn, Ms. Guidera, Ms. Cook, Ms. Lanning, and Mr. L'Orange,

Thank you for your comments submitted during the second 30-day review process, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

NCES is very sensitive to the need to balance increased reporting burden with the utility of the data requested. Each Technical Review Panel meeting, regardless of the topic being discussed, is specifically charged with the task of minimizing the additional institutional burden as a result of increased IPEDS reporting requirements. Further, entire meetings of the IPEDS Technical Review Panel have been dedicated to the topic of IPEDS reporting burden.

Your suggestion for collecting data on private borrowing for all undergraduates is one that may be considered by a future meeting of the IPEDS TRP. At past meetings of the TRP, institutions have made it clear that it is not always known to an institution if the student has taken a private loan in addition to Title IV, state, or institutional aid they

may be receiving. In an effort to minimize reporting burden, the data on aid received by all undergraduates were kept to a minimum, as the data required to calculate an average net price for an institution per the Higher Education Opportunity Act substantially increased the reporting burden for the Student Financial Aid component of IPEDS.

With respect to your comments about the proposed new Outcome Measures (OM) component, two separate TRPs were held on this topic. After much discussion, the TRP suggested that distinguishing between transfer from a 2-year to a different 2-year institution as opposed to transfer from a 2-year to a 4-year institution was unnecessarily burdensome for institutions. Because this information describes an institution's offerings and not necessarily the program that the student enrolled in (i.e. a student transferring to a 4-year institution could be enrolled in a sub-baccalaureate certificate program, an associate's degree program, or a bachelor's program), it may not be particularly meaningful for these purposes. Further, given the substantial increase in burden that this new collection already places on institutions, NCES has proposed that this information be collected only from degree-granting institutions and only at one-point in time—namely 8 years after a student's entry. There will be a place for institutions to report the counts of students that received an award at the 6-year point in time as well. Asking institutions to provide status updates at two different points in time would further increase burden and make the number of different cohorts that an institution is reporting in a given year unwieldy. To completely align the cohorts used in the outcomes measures would require an alignment of current legislation and further study to understand any structural changes in time series published by the department.

Your suggestions for collecting data to calculate cumulative debt at graduation and graduation rate information for Pell recipients and other Title IV programs have been discussed at past meetings of the IPEDS Technical Review Panel (TRP) and National Postsecondary Education Cooperative (NPEC), and have been carefully considered by NCES. At past meetings of the TRP, institutions have made it clear that it is not always known to an institution if the student has taken a private loan in addition to Title IV, state, or institutional aid they may be receiving. Much of this information that is known to the institution is available at a national level through the National Postsecondary Student Aid Study (NPSAS) and the postsecondary longitudinal sample surveys. The Department of Education also feels that this is important data to have at the institutional level, and as noted, the National Student Loan Data System (NSLDS) has already made the necessary changes to its processes in order to provide this information in the future. Adding items to collect this information through IPEDS would be duplicating efforts both for the Department of Education and for the Title IV institutions reporting this information. Further, IPEDS would not be able to provide this data any sooner than it is expected to be available from the National Student Loan Data System (NSLDS). If IPEDS were to collect this information, it would not be available in the IPEDS Data Center until late in 2015, at the earliest.

NCES appreciates your comment regarding the desire to have IPEDS collect completion and retention data on veterans and service members in addition to the other proposed items. The November 2011 IPEDS Technical Review Panel (TRP) ([TRP # 36, Collecting Data on Veterans](#)) on this topic discussed the possibility of adding completion and retention information for veterans and service members, however the panel ultimately concluded that IPEDS is not the appropriate instrument for collection of this information. Given that service members are a particularly transient population due to the nature of their work, an institution level data collection such as IPEDS would not effectively capture their educational activity since it does not capture the movement of individual students between institutions. ED continues to work closely with the Department of Veterans Affairs (VA) and the Department of Defense (DoD) as they refine their existing data systems to provide this information.

NCES appreciates your thoughtful comments on how better data may be made available to veterans and service members as well as providing policymakers and the public more information about the education benefit programs offered to these students. The IPEDS TRP held on this topic suggested that IPEDS is not the appropriate vehicle for collecting graduation rate information for these students, especially given that service members are a particularly transient population due to the nature of their work, and IPEDS, as an institution level data collection, would not capture this activity well. ED is working closely with the Department of Veterans Affairs (VA) and the Department of Defense (DoD) as they work towards providing this information from their already existing data systems.

Sincerely,

Richard J. Reeves
Program Director, Postsecondary Institutional Studies Program

Veterans Comment

Document: ED-2013-ICCD-0128-0026

Name: Ryan Gallucci

Organization: Veterans of Foreign Wars of the U.S.

To Department of Education:

On behalf of the men and women of the Veterans of Foreign Wars of the United States (VFW) and our Auxiliaries, we would like to offer comment on Department of Education's plan to collect information on student veterans in higher education. The VFW continues to support the initiative by the National Center for Education Statistics (NCES) to ask six specific questions through which institutions of higher learning would report additional information to the Integrated Postsecondary Education Data System (IPEDS), as well as changing the scope of graduation rate tracking to include part-time students.

However, the VFW remains concerned that simply asking schools whether or not they participate in the Post-9/11 GI Bill does not satisfy the needs of the veterans' community, which will rely on this new information to deliver quality comparison tools for college-bound veterans.

To enhance the quality, utility, and clarity of the information to be collected, the VFW recommends that when IPEDS asks schools whether or not they participate in the Post-9/11 GI Bill or the Yellow Ribbon Program, schools should also be compelled to provide any Department of Veterans Affairs (VA) facility codes related to GI Bill participation.

Thanks to presidential Executive Order No. 13607 and P.L. 112-249, Department of Education and VA have worked closely to cross-reference school codes for Title IV and GI Bill eligibility, creating a highly-effective institutional crosswalk. Unfortunately, if IPEDS fails to collect VA facility codes from IPEDS participants, this newly-developed school crosswalk will quickly become obsolete.

The VFW believes that the institutional crosswalk is critical to ensuring veterans have access to quality information before choosing an academic institution. VA is on the cusp of launching its ground-breaking institutional comparison tool, which relies on the accuracy of this institutional crosswalk, before the end of the calendar year. The VFW believes that this tool will allow veterans to better understand the characteristics of the schools they plan to attend in only one click, without having to navigate 17 specific web sites across three federal agencies like they must today. Unfortunately, without a specific IPEDS collection clarifying VA facility codes, VA and Department of Education will not be able to regularly update their institutional crosswalk, failing to offer quality, up-to-date information to veterans through the comparison tool in compliance with P.L. 112-249.

The VFW was proud to play a role in the IPEDS Technical Review Panel that developed these potential new questions, and we continue to believe that this new collection of student veteran characteristics will offer greater transparency in higher education for college-bound veterans. We thank the Department of Education for taking our recommendations to heart and working to improve the kinds of information available on our student veterans. However, Department of Education now also has the obligation to keep the VA and Department of Education institutional crosswalk up to date, ensuring accuracy in VA's new comparison tool. We hope IPEDS will consider this minor change to the Post-9/11 GI Bill and Yellow Ribbon Program eligibility questions to ensure that the crosswalk remains relevant through reasonable periodic updates.

Sincerely,

Ryan Gallucci

Deputy Legislative Director, Veterans of Foreign Wars of the U.S.

Response-Veterans

Dear Mr. Gallucci,

Thank you for your comments submitted during the second 30-day review process, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System

(IPEDS) published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made.

IPEDS/NCES will work with the Veterans Administration toward a solution for updating the VA facility code/OPEID/IPEDS ID crosswalk in ways that will not increase the burden on IPEDS respondents. This approach will have the additional advantage of including non-IPEDS programs that are in the OPEID code system, as well as IPEDS Unit IDs. If this approach is not successful, we would welcome the opportunity to revisit this request for consideration by the IPEDS Technical Review Panel for inclusion in the next round of revisions.

NCES also appreciates your thoughtful comments on how better data may be made available to veterans and service members as well as providing policymakers and the public more information about the education benefit programs offered to these students. The IPEDS TRP held on this topic suggested that IPEDS is not the appropriate vehicle for collecting graduation rate information for these students, especially given that service members are a particularly transient population due to the nature of their work, and IPEDS, as an institution level data collection, would not capture this activity well. That is, IPEDS does not capture the movement of individual students between institutions. ED is working closely with the Department of Veterans Affairs (VA) and the Department of Defense (DoD) as they work towards providing this information from their already existing data systems.

The Technical Review Panel meeting of November 2011 identified many issues that could compromise the quality of data about veterans that institutions could currently provide, including availability of data at institutions and states, definitional inconsistencies, and the suitability of IPEDS aggregate data collections as an appropriate data collection vehicle. While we do not anticipate expanding the IPEDS data collection beyond the published proposed changes at this time, progress is being made in some of the problematic areas.

Sincerely,

Richard J. Reeves
Program Director, Postsecondary Institutional Studies Program