

**Public Comment Received During the 60-day Comment Period  
and NCES Responses  
June 2016**

**Integrated Postsecondary Education Data System (IPEDS) 2016-19**

ED-2016-ICCD-0020

Comments on FR Doc # 2016-03338

**Comments related to moving AL questions & study abroad instructions (Comment numbers 6, 7, 8)**

**Document:** ED-2016-ICCD-0020-0006

**Name:** Anonymous

All library questions that are proposed to be added to the Institutional Characteristics survey should instead be moved to the library survey. It will be confusing for people to know or locate which survey contains the specific library information they need if it is in different surveys. Since there is a stand-alone Library survey, it would be best for it to contain all the questions about school libraries.

**Document:** ED-2016-ICCD-0020-0007

**Name:** Anonymous

Please move all questions about the library to the Library survey instead of the Institutional Characteristics survey. Since there is a stand-alone library survey, people seeking information about the library would look for data in that survey instead of the Institutional Characteristics survey.

The deletion of the wording to exclude students who are attending at a branch campus is confusing to schools that have an additional location outside of the United States. These schools have three situations that should be addressed in the instructions of each survey if students should be included or excluded. If there are any of situations please make sure to clarify that in the instructions. It would be helpful if you could mention in the FAQs why this wording was changed. The three situations are:

1. Student is admitted to and will attend all years at your school's foreign location.
2. Student is admitted into the foreign location of your university but attends the USA location for a semester - Include only during the visiting semester in the USA or exclude this semester? If these students are to be included in only some some surveys please make sure to note that in the instructions.
3. Student is admitted into and attends the USA location but takes a semester at a foreign location that may or may not be associated with your school.

**Document:** ED-2016-ICCD-0020-0008

**Name:** Anonymous

Please elaborate in the directions what students should be included in each survey when a school has a location outside of the United States. The deletion in the instructions to exclude students enrolled in a branch campus makes it confusing to determine if students should be included or excluded from the various surveys under these conditions:

Please clarify if students should be included or excluded for the following scenarios for schools that have locations in the USA and another country:

1. Student is admitted to and will attend all years at the foreign location.
2. Student is admitted into the foreign location but attends the USA location for a semester - Include only during the visiting semester in the USA or exclude this semester?

3. Student attends the USA location but takes a semester at a foreign location that may or may not be associated with your school.

**Response:**

Dear Anonymous,

Thank you for your feedback dated February 24, 2016, 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. We are grateful for this process and your comment.

Thank you for submitting your comment proposing to move questions related to academic libraries from the Institutional Characteristics component to the Academic Libraries component because of confusion over library information being located in two surveys. However, it is necessary that questions about academic libraries span across both surveys because the two surveys are collecting different types of information.

The Institutional Characteristics component’s purpose is to collect information about an institution's mission, student services, and student charges. The library questions included within this component are intended to collect information on the library services offered to students. The Institutional Characteristics component allows institutions with or without an academic library the ability to provided information on what/if library services are offered to their students.

The Academic Libraries component’s purpose is to collect information on library collections, expenses, and types of library services provided by degree-granting postsecondary institutions with a library. The academic library questions asked in the Institution Characteristics component do not align with the purposes of the Academic Libraries survey. Thus, their requirement in the Institutional Characteristics component is necessary since they align with the purpose of that survey component.

In response to the comments about study abroad students, NCES will create a Study Abroad Tip Sheet, to be posted to the page [http://nces.ed.gov/ipeds/Section/Data\\_tip\\_sheet](http://nces.ed.gov/ipeds/Section/Data_tip_sheet), that will better clarify when and how these students will be reported for each of the survey components. The tip sheet will include the following table.

Reporting study abroad students enrolled for credit at the institution, by role of the institution and IPEDS survey component

Survey component	Role of the institution where the student is enrolled for credit	
	Home institution	Host institution
Fall Enrollment	<p>Include as degree-seeking only if student is taking courses for credit at the institution or if the institution provides the instructional resource (classroom, instructors) at the foreign location;</p> <p>Include in retention calculations (freshman study abroad students can be added to the first-time cohort and sophomore study abroad students can be considered part of the retained cohort)</p>	<p>Include as non-degree-seeking;</p> <p>Exclude from retention calculations</p>
12-month Enrollment	<p>Include in enrollment if student is taking courses for credit at the institution or if the institution provides the instructional resource (classroom, instructors) at the foreign location</p>	<p>Include in enrollment</p>
Graduation Rates and Graduation Rates 200%	<p>Include in first-time cohort and completion</p>	<p>Exclude from first-time cohort and completion</p>
Outcome Measures	<p>Include in first-time cohort and outcomes</p>	<p>Exclude from first-time cohort</p>

		and outcomes
Institutional Characteristics	Exclude students' cost of attendance	Exclude students' cost of attendance
Student Financial Aid	Exclude students' cost of attendance	Exclude students' cost of attendance
Finance	Include in FTE and scholarships/fellowships processed by the institution	Include in FTE and scholarships/fellowships processed by the institution

NOTE: For student to be reported by either home or host institution, the student must be enrolled for credit at that institution. Study abroad students can include U.S. students taking courses abroad or foreign students taking courses at a U.S. institution

**Home institution** – student is seeking a degree at that institution but may be taking classes in a foreign location

**Host institution** – student is visiting and taking courses for credit, but not seeking a degree at that institution

Answers to the scenarios posed in the comment can be found in the table, which includes more details about the role of the U.S. institution and how students can be reported under several components.

Sincerely Yours,

Richard J. Reeves  
 Postsecondary Branch Chief  
 Administrative Data Division

**Comments related to interlibrary loan fees on AL (Comment numbers 9, 10)**

**Document:** ED-2016-ICCD-0020-0009

**Name:** Robert Dugan

The Department of Education is especially interested in public comment addressing the following issues: 4) how might the Department enhance the quality, utility, and clarity of the information to be collected.

Academic Library component;  
 Library Expenses  
 Materials/services expenses  
 All other materials/service cost

The instructions state to "Include fees paid to bibliographic utilities if the portion paid for the interlibrary loan can be separately counted." is confusing concerning interlibrary loan fees. Suggest changing the instructions to read: "Include the interlibrary loan fees paid to bibliographic utilities if the interlibrary loan costs paid can be separated out from the expenses paid to the bibliographic utility."

**Document:** ED-2016-ICCD-0020-0010

**Name:** Robert Dugan

The Department of Education is especially interested in public comment addressing the following issues: 4) how might the Department enhance the quality, utility, and clarity of the information to be collected.

Academic Libraries component  
 Library Expenses  
 All other operations and maintenance expenses

The instructions state to "Report any other maintenance expenses that have not already been reported in this section. Include: National, regional, and local bibliographic utilities, networks and consortia.

Suggest that this bullet point in the instructions be expanded to include "If interlibrary loan is included as an expense with bibliographic utilities but the costs cannot be separated out, include the interlibrary loan costs here with the library's expenses of the bibliographic utilities."

### Response

Dear Mr. Dugan,

Thank you for your feedback posted March 14, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comment proposing to clarify instructions related to Library Expenses – other materials/service cost in the Academic Libraries component because the current instructions are confusing concerning interlibrary loan fees. In response to your recommendations, NCES will update their instructions on reporting "other materials/service cost" from stating, "Include fees paid to bibliographic utilities if the portion paid for the interlibrary loan can be separately counted" to now state, "Include the interlibrary loan fees paid to bibliographic utilities if the interlibrary loan costs paid can be separated out from the expenses paid to the bibliographic utility." Also, NCES will update their instructions on reporting all other operations and maintenance expenses by including the following statement, "If interlibrary loan is included as an expense with bibliographic utilities but the costs cannot be separated out, include the interlibrary loan costs here with the library's expenses of the bibliographic utilities." We believe that the change in instructions should result in a better understanding of the survey question and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comments related to national level collections on AL (Comment numbers 11, 14)

**Document:** ED-2016-ICCD-0020-0011

**Name:** Robert Dugan

Academic Libraries Component  
Library Collections  
Books Digital/Electronic

Current instructions state to "Include e-book titles in aggregated sets in which the library selected the aggregator even if not each individual e-book title."

A problem may occur when academic libraries include counts of books in national-level collections for which they have access. These counts overstate the e-books titles under the administrative control of the library.

Suggest adding the following language in the instructions: "Do not count e-book titles from the HathiTrust, Center for Research Libraries, Internet Archive, and similar collections unless the library owns the digitized item and it is accessible under current copyright law."

**Document:** ED-2016-ICCD-0020-0014

**Name:** W. Bede Mitchell

I second this suggestion:  
Academic Libraries Component  
Library Collections  
Books Digital/Electronic

Current instructions state to "Include e-book titles in aggregated sets in which the library selected the aggregator even if not each individual e-book title."

A problem may occur when academic libraries include counts of books in national-level collections for which they have access. These counts overstate the e-books titles under the administrative control of the library.

Suggest adding the following language in the instructions: "Do not count e-book titles from the HathiTrust, Center for Research Libraries, Internet Archive, and similar collections unless the library owns the digitized item and it is accessible under current copyright law."

### Response

Dear Mr. Dugan and Mr. Mitchell,

Thank you for your feedback posted March 14, 2016 and March 16, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comments proposing to not count e-book titles from national collections (e.g. Hathi Trust or Internet Archive) unless the library owns the digitized item and it is accessible under current copyright law. In response to your recommendation, NCES plans to exclude e-book titles from national collections unless the library owns the digitized item and it is accessible under current copyright law. The intent of the AL component is for institutions to report what is in their library collection. While e-book titles from national collections (such as Hathi Trust) may be in an institutions discovery tool, we are asking that an institution report the number of titles for which they have "item" records. Including e-book titles from national collections inflate the overall counts for most institutions. This guidance was provided by Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component and NCES accepted their recommendation to not include these items. We believe that the changes in definitions/instructions discussed above should result in a better understanding of the survey questions and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comments related to reporting physical media on AL (Comment numbers 12, 40)

**Document:** ED-2016-ICCD-0020-0012

**Name:** Robert Dugan

The Department of Education is especially interested in public comment addressing the following issues: 4) how might the Department enhance the quality, utility, and clarity of the information to be collected.

Academic Libraries Component  
Library Collections  
Media - Physical

The opening line of the instructions states "Report the number of titles of media materials . . ." but the last line of the same paragraph reads "Items packaged together as a unit and checked out as a unit are counted as one physical unit."

The last line is confusing since libraries are instructed to only report titles.

Suggestion is to delete the last sentence, "Items packaged together as a unit (e.g. two CD-ROMs for one record book) and checked out as a unit are counted as one physical unit." from the instructions.

**Document:** ED-2016-ICCD-0020-0040

**Name:** Linda Miller

About the definition for Physical Media in the Academic Libraries survey:

-Please see a possible suggestion below to clarify the definition. (The text "displayed by visual projection or magnification, or through sound reproduction, or both" is part of the definition for audiovisual materials, and could be confusing here.)

-The serial and microform formats are secondary to type of material (e.g., you can have a serial map, a serial text-based microform, a microform map). May respondents ignore any duplication this might cause in within the media count, or between the media and serial counts (most here caused by microforms)?

-I wonder if it would be more helpful to data users to have some of these counts separated.

#### Physical Media

Report the number of titles of media materials. ADD: INCLUDE AUDIOVISUAL MATERIALS, CARTOGRAPHIC MATERIALS, GRAPHIC MATERIALS AND THREE-DIMENSIONAL ARTEFACTS AND REALIA. [REMOVE: THAT ARE DISPLAYED BY VISUAL PROJECTION OR MAGNIFICATION, OR THROUGH SOUND REPRODUCTION, OR BOTH, INCLUDING SOUND RECORDINGS, MOTION PICTURES AND VIDEO RECORDINGS, MICROFORMS, CARTOGRAPHIC AND GRAPHIC MATERIALS. ITEMS PACKAGED TOGETHER AS A UNIT (E.G., TWO CD-ROMS FOR ONE RECORD BOOK) AND CHECKED OUT AS A UNIT ARE COUNTED AS ONE PHYSICAL UNIT.]

#### Response

Dear Mr. Dugan and Ms. Miller,

Thank you for your feedback posted on March 14, 2016 and April 6, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comments proposing to clarify instructions related to Physical Media in the Academic Libraries component, since the current instructions are confusing because libraries are instructed to only report titles and the AL component now includes serials. In response to your recommendations, NCES will update their instructions on reporting physical media to state, "Report the number of titles of media materials. Include audio visual materials, cartographic materials, graphic materials and three-dimensional artefacts and realia"

In response to clarifying how institutions should report media and serials, NCES is working with the Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component to ensure that survey tips, and FAQs are provided, along with survey instructions and definitions, that provides guidance on what items are included in each category. However, NCES currently does not have plans to have separate counts for types of materials categorized within media because of the burden that it would create on institutions reporting to IPEDS. We believe that the change in instructions and additional guidance provided on the AL component for media and serials should result in a better understanding of the survey questions and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

[Comment related to interlibrary services on AL \(Comment number 13\)](#)

**Document:** ED-2016-ICCD-0020-0013

**Name:** David Larson

The Department of Education is especially interested in public comment addressing the following issues: 4) how might the Department enhance the quality, utility, and clarity of the information to be collected.

Academic Library component:

Section 1

Does your institution have interlibrary services?

"Interlibrary services" is not defined and should be replaced with the more-commonly used "interlibrary loan services." The definition of "interlibrary loan services" should reference Section 1.0 of the Interlibrary Loan Code for the United States (<http://www.ala.org/rusa/resources/guidelines/interlibrary>): "Interlibrary loan is the process by which a library requests material from, or supplies material to, another library" where "'material' includes books, audiovisual materials, and other returnable items as well as copies of journal articles, book chapters, excerpts, and other non-returnable items."

### Response

Dear Mr. Larson,

Thank you for your feedback posted March 15, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comment proposing to rename and redefine interlibrary services to interlibrary loan services in Section 1 of the Academic Libraries (AL) component because the current term is not commonly used. In response to your recommendation, NCES will change the terminology in Section 1 of the AL component from interlibrary services to interlibrary loan services in order to align the AL survey with language commonly used in the AL field. Also, NCES will provide clarification to the term interlibrary loan services by aligning the definition with what is commonly used in the field by referencing Section 1.0 of the Interlibrary Loan Code for the United States stating, "Interlibrary loan is the process by which a library requests material from, or supplies material to, another library" where "'material' includes books, audiovisual materials, and other returnable items as well as copies of journal articles, book chapters, excerpts, and other non-returnable items." We believe that the change in terminology should result in a better understanding of the survey questions and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comments related to reporting serials on AL (Comment numbers 15, 16, 17, 19, 20, 22)

**Document:** ED-2016-ICCD-0020-0015

**Name:** Susanna Smith

For the serials "Add "Serials" row to Library Collections and include in the calculated total for circulation", I am concerned because the instructions are not clear. We subscribe to thousands of serials through our databases, which are already covered in full. Is this meant to cover those serials we subscribe to separately? Would this include paid digital subscriptions to newspaper and serial websites, like the Chronicle of Higher Education's site?

If this is the case, the instructions need to be modified: Serials - Report the number of publications issued in successive parts, usually at regular intervals, and, as a rule, intended to be continued indefinitely. Serial subscriptions include periodicals, newspapers, annuals (reports, yearbooks, etc.), memoirs, proceedings, and transactions of societies. This does not include serials accessed through a database, but those purchased separately. Include (or do not include!) paid access to websites that house the content of particular serials (ie: "The Chronicle

of Higher Education")

If I have misunderstood, then the instructions need to be more specific about WHERE you want us to gather all the serials data

**Document:** ED-2016-ICCD-0020-0016

**Name:** Robert Dugan

The Department of Education is especially interested in public comment addressing the following issues: 4) how might the Department enhance the quality, utility, and clarity of the information to be collected.

Academic Libraries component

Library Collections

Serials, Physical

The proposed instructions for Serials, Physical states: "Report the number of publications issued in successive parts, usually at regular intervals, and, as a rule, intended to be continued indefinitely. Serial subscriptions include periodicals, newspapers, annuals (reports, yearbooks, etc.), memoirs, proceedings, and transactions of societies."

For the instructions:

1. clarify that libraries report the number of serials publications titles. If titles are not included in this instruction, libraries may report the number of serial issues or serial volumes (e.g., there may be 12 volumes for one serial publication title). The reporting of titles for serials publications parallels the current instructions concerning microforms (Media, Physical) which asks libraries to report the number of titles rather than the number of units (e.g., reels of microfilm).
2. emphasize that bound serial volumes are reported as physical books. Libraries are likely to report the number of bound serial volumes in the Serials, Physical box. That may be IPEDS' intent. If so, then the current text instructions for Books, Physical needs to be revised to instruct respondents to report bound physical serial volumes as Serials, Physical.

**Document:** ED-2016-ICCD-0020-0017

**Name:** Robert Dugan

The Department of Education is especially interested in public comment addressing the following issues: 4) how might the Department enhance the quality, utility, and clarity of the information to be collected.

Academic Libraries component

Library Collections

Serials, Digital/Electronic

The proposed instructions for Serials, Digital/Electronic are not included in the proposed survey revision. Suggest that IPEDS develop these instructions with assistance from the ACRL, ALA and ARL Joint Advisory Task Force on IPEDS/AL Component New Data Elements and Definitions.

**Document:** ED-2016-ICCD-0020-0019

**Name:** Mary Jane Petrowski

I support Robert Dugan's suggestion below:

Academic Libraries component

Library Collections

Serials, Physical

The proposed instructions for Serials, Physical states: "Report the number of publications issued in successive parts, usually at regular intervals, and, as a rule, intended to be continued indefinitely. Serial subscriptions include periodicals, newspapers, annuals (reports, yearbooks, etc.), memoirs, proceedings, and transactions of societies."

For the instructions:



1. clarify that libraries report the number of serials publications titles. If titles are not included in this instruction, libraries may report the number of serial issues or serial volumes (e.g., there may be 12 volumes for one serial publication title). The reporting of titles for serials publications parallels the current instructions concerning microforms (Media, Physical) which asks libraries to report the number of titles rather than the number of units (e.g., reels of microfilm).
2. emphasize that bound serial volumes are reported as physical books. Libraries are likely to report the number of bound serial volumes in the Serials, Physical box. That may be IPEDS' intent. If so, then the current text instructions for Books, Physical needs to be revised to instruct respondents to report bound physical serial volumes as Serials, Physical.

**Document:** ED-2016-ICCD-0020-0020

**Name:** Mary Jane Petrowski

I support Robert Dugan's comment below:

The Department of Education is especially interested in public comment addressing the following issues: 4) how might the Department enhance the quality, utility, and clarity of the information to be collected.

Academic Libraries component

Library Collections

Serials, Digital/Electronic

The proposed instructions for Serials, Digital/Electronic are not included in the proposed survey revision. Suggest that IPEDS develop these instructions with assistance from the ACRL, ALA and ARL Joint Advisory Task Force on IPEDS/AL Component New Data Elements and Definitions.

**Document:** ED-2016-ICCD-0020-0022

**Name:** Terri Fishel

By adding Serials to the IPEDS academic library data form, the Definition for Physical Books needs to be addressed. The form for 2015-16 states for Physical Books (include government documents and serial backfiles) - so will serial backfiles be in Serial count or Book count?

Strongly recommend that all definitions for the IPEDS collection are consistent with the ACRL Annual Survey definitions. The current ACRL survey allows for a single form to be filled in and the IPEDS are extracted as a separate file. Consistency between the two data collections would allow for fewer questions and a better understanding of what is being collected.

### Response

Dear Ms. Smith, Mr. Dugan, Ms. Petrowski, and Ms. Fishel,

Thank you for your feedback submitted during the 60-day review process, responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comment on the addition of collecting data on physical and digital/electronic serials and the instructions that accompany these additions in the Academic Libraries survey component. NCES is aware that the alignment of our definitions and instructions with the standards within the academic library field for materials classified in physical and digital/electronic collection and circulation is of utmost importance.

NCES is currently working with the Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component to define and provide guidance on reporting serials in the Academic Libraries component, as well as ensuring all our definitions and instructions align with other items collected in the AL component and with the expected standards within the academic library field.

The AL component will ask that institutions report the number of physical and digital/electronic serial titles that are accessible to users through the library's catalog or discovery system. A serial is a publication in any medium issued in successive parts bearing numerical or chronological designations and intended to be continued indefinitely. This definition includes, in any format, periodicals, newspapers, and annuals (reports, yearbooks, etc.); the journals, memoirs, proceedings, transactions, etc. of societies; and numbered monographic series. An e-serial is a periodical publication that is published in digital form to be displayed on a computer screen. The AL component will also provide additional guidance that institutions report serial titles and not subscriptions, include count of ceased titles if available, and include open access (OA) titles if the individual titles are searchable through the library's catalog or discovery system. We believe that the results in this collaboration with the ACRL and ARL Joint Advisory Task Force should result in a better understanding of how to report serials and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comments related to databases and discovery systems on AL (Comment numbers 18, 21)

**Document:** ED-2016-ICCD-0020-0018

**Name:** Robert Dugan

The Department of Education is especially interested in public comment addressing the following issues: 4) how might the Department enhance the quality, utility, and clarity of the information to be collected.

Academic Libraries component  
Library Collections  
Databases, Digital/Electronic

A database is defined in the instructions. The text also instructs the respondent to not include discovery systems in the count of databases. Suggest that IPEDS:

a. link the phrase "discovery tool" to the Glossary at this instance in the instructions

OR

b. include the Glossary definition for discovery system at this point in the instructions

OR

c. provide a brief or otherwise truncated definition for discovery system at this point in the instructions, such as "Discovery systems are end-user software-based platforms which enable users to simultaneously search metadata in a unified index of local library holdings, electronic collections, and external indexes, and presents search results in a single interface."

**Docket:** ED-2016-ICCD-0020

Integrated Postsecondary Education Data System (IPEDS) 2016-2019

**Document:** ED-2016-ICCD-0020-0021

**Name:** Mary Jane Petrowski

I support the comment below:

The Department of Education is especially interested in public comment addressing the following issues: 4) how might the Department enhance the quality, utility, and clarity of the information to be collected.

Academic Libraries component  
Library Collections  
Databases, Digital/Electronic

A database is defined in the instructions. The text also instructs the respondent to not include discovery systems in the count of databases. Suggest that IPEDS:

a. link the phrase "discovery tool" to the Glossary at this instance in the instructions

OR

b. include the Glossary definition for discovery system at this point in the instructions

OR

c. provide a brief or otherwise truncated definition for discovery system at this point in the instructions, such as "Discovery systems are end-user software-based platforms which enable users to simultaneously search metadata in a unified index of local library holdings, electronic collections, and external indexes, and presents search results in a single interface."

### Response

Dear Mr. Dugan and Ms. Petrowski,

Thank you for your feedback posted March 21, 2016 and March 22, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comments proposing to clarify instructions related to databases and discovery systems in the Academic Libraries component. In response to your recommendation, NCES will provide a link to the glossary definition of discovery systems in the Digital/Electronic Database section of the Academic Libraries instructions that state, "Do not include discovery systems in the count of databases." Also, NCES will provide clarification to the terminology of databases and discovery system by providing an FAQ that discusses the difference between the two terms. We believe that the change in instructions should result in a better understanding of the survey questions and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comment related to schedule materials and links in collection system (Comment number 23)

**Name:** Jarod Hightower-Mills

I would strongly recommend that IPEDS in the future make sure that the dates for the next collection period before the Fall Collection period closes. Institutions and departments involved in collecting and reporting this data needs to plan for when they need to have resources available to respond to next year's surveys.

In addition, the survey guides should be revised to make them for user-friendly. If possible, the survey data entry GUI should link directly to relevant information so that people who are new to IPEDS reporting can complete the survey accurately and efficiently.

### Response

Dear Mr. Hightower-Mills,

Thank you for your feedback dated March 23, 2016, 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. We are grateful for this process and your comment.

In regard to the comment about the collection schedule, NCES currently provides the schedule for the new collection during the Winter/Spring collection. While this may seem late, this helps to ensure that the dates for the collection are fixed and less likely to change due to unanticipated circumstances. However, the dates do follow a

pattern that, assuming there are not unanticipated circumstances, can be estimated by an institution. Registration typically starts the first or second Wednesday in August, with the Fall collection opening 4 weeks after registration and lasting 6 weeks for keyholders and 8 weeks for coordinators, the Winter collection opening 6 weeks after the Fall coordinator close and lasting 9 weeks for keyholders and 11 weeks for coordinators, and the Spring collection opening at the same time as the Winter collection and lasting 18 weeks for keyholders and 20 weeks for coordinators.

In regard to the comment about the survey guide and links within the data collection system to help materials, we continuously looks at ways to improve these materials and have a number of links to the materials within the survey pages. On survey pages there are, as applicable, links to screen level instructions, glossary definitions, screen tips, and instructional videos. The Help menu includes a detailed New Keyholder Handbook, full survey materials, data collection system instructions and tutorial, flyers with more information on our training and dedicated IPEDS Help Desk, and more. NCES will continue to identify ways for improvement in this area, and will implement any identified improvements for the next OMB clearance.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

#### Comments related to institutional repository on AL (Comment numbers 24, 25)

**Document:** ED-2016-ICCD-0020-0024

**Name:** Rachel Kirk

What is the preferred methodology for quantifying usage for Institutional Repository documents? We first considered using Bitstream views, but realized that this metric is not as analogous to full-text downloads as we originally thought. We are using Dspace for our institutional repository.

**Document:** ED-2016-ICCD-0020-0025

**Name:** Rachel Kirk

Please provide instructions on determining usage/circulation for documents in Institutional Repositories.

#### Response

Dear Ms. Kirk,

Thank you for your feedback posted March 30, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comments.

Thank you for submitting your comments regarding the collection of Institutional Repositories in the Academic Libraries (AL) component. In response to your comments and questions on providing instructions and methodology on how to report institutional repositories in the AL component, NCES does not plan to collect data on institutions repositories on the AL survey. This guidance was provided by Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component and NCES accepted their recommendation that collecting this information across all institutions is currently not viable and would increase the burden for institutions to report to IPEDS. However, NCES will clarify in the AL component's instructions/FAQs that IPEDS does not ask institutions to report institutional repositories. We believe that not including institutional repositories will reduce the burden of institutions reporting to IPEDS and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comment related to agreement with changes on AL (Comment number 26)

**Document:** ED-2016-ICCD-0020-0026

**Name:** Rosanne Cordell

The changes to the Academic Libraries portion seem reasonable.

#### Response

Dear Ms. Cordell,

Thank you for your feedback posted March 31, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

In regards to your comment stating that the changes to the Academic Libraries (AL) component are reasonable. We value your feedback and believe that the changes proposed to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19 AL component should result in a better understanding of the survey questions and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comment related to consortia funds and reserve circulation on AL (Comment number 27)

**Document:** ED-2016-ICCD-0020-0027

**Name:** Steven Ovadia

1. Please add money spent on behalf of an institution, for consortial systems where a centralized office contributes resources
2. Include reserve circulation as part of physical circulation.

#### Response

Dear Mr. Ovadia,

Thank you for your feedback posted April 1, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

In regards to your comments proposing to add expenses from consortia systems that contribute resources to an institution and to include reserve circulation as part of a library's physical circulation. The intent of Section II: Expenses of the AL component is for institutions to report funds expended by the library from its regular budget or from the institution's budget (if library items are identifiable to report). We do not currently plan to include expenses from entities that contribute resources to the library outside of the institution. The survey's intent is to focus on the expenses of only the institution. The one exception to this is in the case of a consortia where individual library members share all the same library resources and library budget. In this case a parent/child relationship for reporting AL data may be established if certain criteria are met.

In response to your recommendation to include reserve circulation as part of a library's physical circulation, NCES will begin to count under initial circulation of physical items the physical-print reserve circulation (this way the initial circulation count will reflect all physical-print circulation of content whether it is part of the regular print

collection or the reserve print collection). We believe that the change in collection should provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### **Comment related to volume count and national collections on AL (Comment number 28)**

**Document:** ED-2016-ICCD-0020-0028

**Name:** Karl S

It's time to end the "volume count" of physical books. This is difficult to compile in modern automation systems and more or less irrelevant when it comes to digital content. It is a leftover from an earlier age of library comparisons that has outlived its usefulness.

As a library administrator doing comparison work, I want to see how many "titles" a library provides access to, in print or digital form, broken down by formats (print book, electronic book, print serial, electronic serial, etc.). Like many libraries, we have overlap in titles held in print and electronic format, etc., so the overall number of titles need not equal the sum of titles by format.

I would also like to see what percentage of content in a library's discovery environment is purchased, licensed, demand-driven acquisition, or open access.

The dramatic shift in access and acquisition options is driving innovation in library services, and we shouldn't exclude huge swaths of library content because our definitions are wedded to an old-fashioned model of library collections. Contrary to other commentators who want to exclude broadly available open access titles (e.g. Hathi Trust or Internet Archive) because they think it "inflates" counts, I think it is interesting to know how open access content is becoming a part of the package of services that libraries are providing. It is helpful, however to know how much content comes from a particular mode of acquisition/access.

### **Response**

Dear Karl S.,

Thank you for your feedback posted April 1, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

In regards to your comments proposing to: (1) stop counting volumes of physical books, (2) include percentages of content in a library's discovery environment; and (3) include broadly available open access titles (e.g. Hathi Trust or Internet Archive) in the collection.

In response to your recommendation to stop counting volumes of physical books, NCES will change our physical book circulation definition to only include counting titles, not volumes. This will ensure that the definition for physical books aligns with the definitions of other circulation counts collected for IPEDS.

In regard to your second recommendation to include percentages of content in a library's discovery environment, NCES does not plan to include this on the AL component. Currently, most institutions do not have a way to report this information without substantially increasing their burden to report to IPEDS. NCES will bring this topic to the Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component and discuss the possibility of adding this in the future.

Finally, in response to your recommendation to include broadly available open access titles in the collection, NCES does not plan to include this on the AL component. The intent of the AL component is for institutions to report

what is in their library collection. While broadly available open access titles (such as Hathi Trust) may be in an institutions discovery tool, we are asking that an institution report the number of titles for which they have "item" records. Including broadly available open access titles inflates overall counts for most institutions since these are available to almost all of them. The IPEDS AL component is directed towards what is in the institutions library collection. This guidance was provided by Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component, and NCES accepted their recommendation to not include these items. We believe that the changes in definitions/ instructions discussed above should result in a better understanding of the survey questions and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comment related to all proposed changes (Comment number 29)

**Document:** ED-2016-ICCD-0020-0029

**Name:** Rachel Whittingham

These changes are thoughtful, reasonable and should be approved.

### Response

Dear Ms. Whittingham,

Thank you for your feedback posted April 1, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

In regards to your comment stating that the changes are thoughtful, reasonable, and should be approved. We value your feedback and believe that the changes proposed to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19 AL component should result in a better understanding of the survey components and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comments related to digital and electronic circulation on AL (Comment numbers 30, 41)

**Document:** ED-2016-ICCD-0020-0030

**Name:** Susan Erickson

The question about digital/electronic circulation needs clarification. There are a number of usage statistics that could be used to determine this. Having each library make it's own judgment call about which count to use is not useful for trying to get comparative statistics across institutions.

**Document:** ED-2016-ICCD-0020-0041

**Name:** Linda Miller

For the Academic Libraries survey:

Comments about the definition for Digital/Electronic Circulation or Usage:

-The definition is somewhat confusing on COUNTER reports. I think that MR2 use is the same use as MR1, but broken out by media type. And, I think that BR2s and BR1s aren't to be provided for the same use, so are not duplicative.

-COUNTER release 4 allows for providers to provide BR2s that report at a level more granular than section, but requires that they report which type of use is being reported.

-It seems that to make the data useful for benchmarking purposes (although there will always be caveats), the national surveys should break e-resource use into specific categories, OR request that only certain categories be reported (i.e., COUNTER). (Possible categories?: BR1, BR2-section, BR2-more granular or otherwise inflated, MR1or2, sessions, views, other)

-Many universities have more than one campus and therefore more than one IPEDS ID. However, more and more, e-subscriptions are being purchased jointly between campuses.

### Response

Dear Ms. Miller and Ms. Erickson,

Thank you for your feedback posted April 1, 2016 and April 6, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comments proposing to clarify instructions on reporting digital/electronic circulation. In response to your comments, NCES plans to work with the Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component to provide survey tips and FAQs that can give additional guidance on how institutions report digital/electronic circulation. However, NCES does not plan to ask institutions to report circulation based on specific categories nor does NCES plan on requiring institutions to report digital and electronic usage using a specified methodology. Currently, not all institutions that report data in the AL component have the ability to report digital and electronic usage based on COUNTER reports. NCES does not plan on requiring institutions to use the COUNTER method because it would increase reporting burden and possible costs to the institutions. NCES believes that asking institutions to report digital and electronic usage based on COUNTER reports (if available) and if not available, report based on other means for monitoring digital and electronic usages (downloads, session views, transaction logs, etc.) is the best avenue since there is not a preferred/consistent method of collecting digital and electronic usage in the AL field. We believe that not mandating a method of reporting digital and electronic usage will reduce the burden on institutions reporting to IPEDS. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comment related to reserves and renewals on AL (Comment number 31)

**Document:** ED-2016-ICCD-0020-0031

**Name:** Anonymous

The comment that follows pertains to the answer/submission to Total physical circulation under Section I Physical Group Information on the AL component of IPEDS...."Frustrating as this definition doesn't match the 2015-16 IPEDS instructions. I am using the 15-16 instructions meaning I should add my reserve count back in, (which was itemized/taken out in ACRL-#62). I am also leaving out my renewals with this question, again per the 15-16 instructions. If the total physical circulation should include reserves and renewals, this number should be lines 60-62 from the ACRL, not just line #60 (initial circulation)."

### Response

Dear Anonymous,

Thank you for your feedback posted April 1, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comment requesting clarification on how to report reserves and renewals in physical circulation for the AL component. In the 2015-2016 instructions, reserves and renewals were removed from reporting under physical collection in the AL survey. In 2015-16, for those libraries using the ACRL survey to also report their IPEDS AL data, they should have reported line 60 (initial circulation) as the IPEDS number and not sum lines 61 and 62 into line 60 because the IPEDS AL component did include reserves and renewals as part of a library's physical circulation.

Based on feedback from the Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component, in 2016-17 NCES will begin to count under initial circulation of physical items the physical-print reserve circulation (this way the initial circulation count will reflect all physical-print circulation of content whether it is part of the regular print collection or the reserve print collection). However, this will not include renewals or equipment circulation counts because the practice of lending equipment varies from library to library considerably in terms of what the equipment (ranging from bicycles to cords) is making any comparison difficult. We believe that the change in collection should provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

#### **Comments related to print photographs on AL (Comment numbers 32, 34, 45)**

**Document:** ED-2016-ICCD-0020-0032

**Name:** Robert Dugan

Academic Library Component  
Library Collections  
Physical Books

The instructions ask that responders "Include print photographs, duplicates and bound volumes of periodicals and music scores."

Please reconsider the inclusion of print photographs in reporting in Library Collections

**Document:** ED-2016-ICCD-0020-0034

**Name:** Linda Miller

Academic Libraries  
Section I  
Library Collections/Circulation  
Definition for Physical Books

Please remove the phrase "print photographs" in caps below. It doesn't appear to be part of the NISO definition, and is potentially confusing.

Physical Books (include government documents and serial backfiles) - Report the number of volumes using the ANSI/NISO Z39.7-2013 definition for volume, which is as follows: A single physical unit of any printed, typewritten, handwritten, mimeographed, or processed work, distinguished from other units by a separate binding, encasement, portfolio, or other clear distinction, which has been cataloged, classified, and made ready for use, and which is typically the unit used to charge circulation transactions. Include PRINT PHOTOGRAPHS, duplicates and bound volumes of periodicals and music scores. For purposes of this questionnaire, unclassified bound serials arranged in alphabetical order are considered classified. Exclude microfilms, maps, nonprint materials, and uncataloged items. Include Government document volumes that are accessible through the library's catalogs

regardless of whether they are separately shelved. "Classified" includes documents arranged by Superintendent of Documents, CODOC, or similar numbers. "Cataloged" includes documents for which records are provided by the library or downloaded from other sources into the library's card or online catalogs.

**Document:** ED-2016-ICCD-0020-0045

**Name:** Steve Hiller

Physical books includes photographs and Physical Media includes graphic materials. The definition provided for graphic materials includes photographs. Photographs have traditionally been counted as physical media/graphic materials and recommend that they are part of that category and not counted under physical books.

### Response

Dear Mr. Dugan, Ms. Miller, and Mr. Hiller,

Thank you for your feedback posted April 4, 2016 and April 8, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comments.

Thank you for submitting your comments proposing to remove reporting print photographs in physical books in the Academic Libraries (AL) component. In response to your recommendations, NCES will remove reporting print photographs in physical books because we already ask institutions to report graphic material (including photographs) in physical media. We believe that the change in instructions should result in a better understanding of the survey questions and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comment related to combining reporting of restricted & unrestricted institution grants (Comment number 33)

**Document:** ED-2016-ICCD-0020-0033

**Name:** Vincent Castano

Having reviewed the proposed changes, I see no adverse impact for gathering the required data at my institution. I do have a concern regarding changes to the Finance portions; specifically, the combination of unrestricted and restricted data for reporting purposes. Annual Title III applications request data elements that include these categories. By combining these figures, I am curious as to whether the combined data will adversely affect data reporting from these categories.

### Response

Dear Mr. Castano,

Thank you for your feedback dated April 04, 2016, 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. We are grateful for this process and your comment.

NCES has requested that "institution grants (unrestricted)" and "institution grants (restricted)" be combined into one field called "institution grants (restricted and unrestricted)" on the Scholarship/Fellowship portion of the Finance survey. This change will only impact the reporting of institution grants on the Scholarship/Fellowship screen and will not affect the reporting of unrestricted or restricted data on any other portion of the Finance survey (e.g., unrestricted or restricted revenues or net assets).

Additionally, Title III applications typically pull data from the Expense screen of the Finance survey, which will not be impacted by the change to the Scholarship/Fellowship screen. As such, we do not believe that the requested change to combine “institution grants (unrestricted)” and “institution grants (restricted)” into one field will adversely affect data reporting for Title III applications.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

#### **Comment related to open access on AL (Comment number 35)**

**Document:** ED-2016-ICCD-0020-0035

**Name:** Anonymous

The definition for Digital/Electronic Books does not address open access items. It is only addressed in the FAQ. It would make things easier for users, and more consistent for reporting, if it was included in the definition.

#### **Response**

Dear Anonymous,

Thank you for your feedback posted April 5, 2016 responding to a request for comments on proposed changes to the Department of Education’s Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

In response to your recommendation, NCES will address in the definition/instructions for digital/electronic books how to report open access items. While NCES does allow open access items to be included if the individual titles are searchable through the library’s catalog or discovery system, broadly available open access titles will not be to include in the AL component. The intent of the AL component is for institutions to report what is in their library collection. While broadly available open access titles (such as Hathi Trust) may be in an institutions discovery tool, we are asking that an institution report the number of titles for which they have "item" records. Including broadly available open access titles inflates the overall counts for most institutions since these are available to almost all of them. The IPEDS AL component is directed more towards what is in the institutions library collection. This guidance was provided by Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component and NCES accepted their recommendation to not include these items. We believe that the changes in definitions/instructions discussed above should result in a better understanding of the survey questions and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

#### **Comment related to material expenditures on AL (Comment number 36)**

**Document:** ED-2016-ICCD-0020-0035

**Name:** Linda Miller

Some possible suggestions to clarify the Materials Expenditures definitions. Possible additions in caps; possible text to remove in caps in brackets.

One-time purchases of books, serial back-files, and other materials

Provide the cost of one-time purchases of books, serial backfiles, and other materials. Report expenses for published materials in all formats including archives and special collections [REMOVE: EXCEPT CURRENT SUBSCRIPTIONS TO SERIALS]. Include one-time acquisitions ...

Ongoing commitments to subscriptions

Report expenses for ongoing COMMITMENTS [REMOVE: SUBSCRIPTIONS TO SERIALS] in all formats, including duplicates, for all outlets. THIS INCLUDES SERIALS AND ANY OTHER ITEMS COMMITTED TO ANNUALLY, AS WELL AS ANNUAL E-PLATFORM OR ACCESS FEES. These are publications issued in successive parts, usually at regular intervals, and, as a rule, intended to be continued indefinitely. PRINT-BASED Serial subscriptions include periodicals, newspapers, annuals (reports, yearbooks, etc.), memoirs, proceedings, and transactions of societies. Include the costs of electronic serials bought in aggregations and serial packages. Include abstracting and indexing services and any database that requires an annual subscription fee. [REMOVE-ADDED ABOVE: INCLUDE ANNUAL ELECTRONIC PLATFORM OR ACCESS FEES.] Do not include subscription fees if THEY ARE [REMOVE: IT'S] part of an annual consortium fee. Government documents received serially are included if they are accessible through the library's catalog.

All other materials/service cost (line 22)

Report additional materials/service costs that have not already been reported in this section.

Other materials may include:

-Document delivery/interlibrary ...

-Other expenses for information resources. [REMOVE: REPORT EXPENSES SUCH AS THOSE FOR CARTOGRAPHIC MATERIALS AND MANUSCRIPTS\*] Include copyright fees and fees for database searches, e.g. (Lexis-Nexis).

\*A comment about the last suggestion above: It seems, by definition, that expenses for maps and manuscripts should be included in the first 2 measures and not this last measure. Not sure what "costs such as" means in that sentence

### Response

Dear Ms. Miller,

Thank you for your feedback posted April 5, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

In response to your suggestions and based on feedback from the Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component, NCES has updated the definitions and instructions of Section II: Expenses of the AL component to reflect how institutions now report collections and expenses of serials. The overall changes to instructions/definitions of the AL components, that now reflect the inclusion of serials, can be viewed in the Supporting and Related Material documents for Forms and Instructions for the proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. We believe that the changes in definitions and instructions should provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comment related to context boxes and counts on AL (Comment number 37)

**Document:** ED-2016-ICCD-0020-0037

**Name:** Anonymous

Comments about context boxes:

-It appears that none of the context boxes in the Academic Libraries survey will be used in the College Navigator Website. Could the instructions note that instead of saying some are, and not indicating how we can tell which?

-The survey requires some counts must be submitted, but offers no way to indicate publicly just how rough an estimate might be.

### Response

Dear Anonymous,

Thank you for your feedback posted April 5, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

In response to your recommendation to clarify instructions about context boxes, NCES will provide new instructions stating that context boxes in the AL component will not be used on the College Navigator website. While some IPEDS surveys have context boxes that are used on the College Navigator website, College Navigator does not currently use any of the AL component's context boxes and NCES will change the instructions to reflect this.

In regard to your second recommendation to include guidance on how institutions can estimate counts, NCES does not plan on making any additional changes on how to report counts than is already provide in the instructions. The intent of the AL component is for institutions to report actual numbers based on their collections and expenses and not provide estimates. In cases where IPEDS, along with the Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component, have decided that some institutions may not be able to provide accurate counts, we have provided guidance on how to provide estimates. For example, institutions that report as a consortium member might not have access to digital/electronic circulation counts for their individual institution. In this case, IPEDS provides a method for estimating usage for just their institution by using the percentage of the institution's contribution to the total consortia fee or by using the percentage of the institution's Full-Time Equivalent (FTE) student to the consortia's total FTE student count. However, if not directly addressed in the instructions on how to provide estimates, NCES expects the institution to provide actual counts for AL collections and expenses.

We believe that the clarifications in definitions/instructions discussed above should result in a better understanding of the survey questions and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comment related to adding questions on AL (Comment number 38)

**Document:** ED-2016-ICCD-0020-0038

**Name:** Rebecca T

I agree with the suggestion to redefine volumes in a collection to include eBook titles. If the old volumes definition remains, I would like to see a question added to show the percentage of expenses spent on print vs. digital titles. That is a trend worth documenting.

Other suggestions for new questions:

Membership in consortia (how many state and private) to reduce expenses.

Add computer lab assistance (non-appointments) to staff assistance in addition to reference..

iPad equipment circulation and the accompanying staff time spent on iPad assistance (and breakage, replacement).

### Response

Dear Rebecca T,

Thank you for your feedback posted April 5, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comments proposing to: (1) stop counting volumes of physical books, (2) count types of consortiums that institutions are members; and (3) collect information about assistance provided by libraries for computer labs and iPad support in the Academic Libraries (AL) component.

In response to your recommendation to stop counting volumes of physical books, NCES will change our physical book circulation definition to only include counting titles, not volumes. This will ensure that the definition for physical books aligns with the definitions of other circulation counts collected for IPEDS.

In regard to your second recommendation to count types of consortiums that institutions are members, NCES does not plan to include this on the AL component. The AL component is solely focused on institutions reporting their collections and expenses and is not focused on the type (e.g. private or public) that academic libraries partner with to provide resources to their students.

Finally, in response to your recommendation to collect information about assistance provided by libraries for computer labs and iPad support in the AL component, NCES does not plan to include this on the AL component. This guidance was provided by Association of College and Research Libraries (ACRL) and Association of Research Libraries (ARL) Joint Advisory Task Force on IPEDS/AL Component that advises IPEDS on the AL component. NCES accepted the Joint Advisory Task Force's recommendation to not include these items because not all institutions have access to provide this information and requiring them to do so would increase their burden to report to IPEDS. We believe that the changes and non-changes in definitions/instructions discussed above should result in a better understanding of the survey questions and provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

#### **Comment related to IC question, serials, and centralized funding on AL (Comment number 39)**

**Document:** ED-2016-ICCD-0020-0039

**Name:** Anonymous

Page 8 (Table 2): Add the following item: which of the following library resources or services does your institution provide ... This would be more appropriately asked on the Library Survey, as at my institution the office filling out the Institutional Characteristics does not have this information available to them.

Page 18 (Table 14) Adding a serials row for volume count and circulation count ... This is a step backwards - physical volume counts are fairly useless, why complicate them by separating books from serials? Also, we do not track circulation by type of material, never have. Most of our usage is electronic, and we're more interested in counts of titles, not physical volumes.

Not mentioned, please add: Please include a line on money spent on behalf of an institution, where a centralized office contributes resources. In our case the university system provides an amount of money managed by the campuses that provides twice as many resource dollars as I spend locally. Without that information, someone looking at our number of databases and usage numbers would get a very incomplete picture.

#### **Response**

Dear Anonymous,

Thank you for your feedback posted April 5, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comments proposing to: (1) move the library resources and services question from the institutional characteristics (IC) component to the Academic Libraries (AL) component; (2) count titles instead of volumes for physical collections and circulation; and (3) add expenses from consortia systems/centralized offices that contribute resources to an institution's academic library.

In response to your recommendation to move the question related to academic libraries from the IC component to the AL component, NCES believes it is necessary that questions about academic libraries span across both surveys because the two surveys are collecting different types of information.

The Institutional Characteristics component's purpose is to collect information about an institution's mission, student services, and student charges. The library questions included within this component are intended to collect information on the library services offered to students. The Institutional Characteristics component allows institutions with or without an academic library the ability to provide information on what/or if library services are offered to their students.

The Academic Libraries component's purpose is to collect information on library collections, expenses, and types of library services provided by degree-granting postsecondary institutions with a library. The academic library questions asked in the Institutional Characteristics component do not align with the purposes of the Academic Libraries survey. Thus, their requirement in the Institutional Characteristics component is necessary since they align with the purpose of that survey.

In response to your recommendation to stop counting volumes of physical books, NCES will change our physical book circulation definition to only include counting titles, not volumes. This will ensure that the definition for physical books aligns with the definitions of other circulation counts collected for IEPDS.

Finally, in response to your recommendation to add expenses from consortia systems/centralized offices that contribute resources to an institution's academic library, NCES does not plan on adding this to the current survey. The intent of Section II: Expenses of the AL component is for institutions to report funds expended by the library from its regular budget or from the institution's budget (if library items are identifiable to report). We do not currently plan to include expenses from entities that contribute resources to the library outside of the institution. The survey's intent is to focus on the expenses of only the institution. The one exception to this is in the case of a consortia where individual library members share all the same library resources and library budget. In this case a parent/child relationship for reporting AL data may be established if certain criteria are met. We believe that the changes in collection and the need for certain instructions/questions to remain the same, as discussed above, should provide improved accuracy and quality of the data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

#### **Comment related to indexing and abstracting services on AL (Comment number 42)**

**Document:** ED-2016-ICCD-0020-0042

**Name:** Anonymous

A question about the following FAQ for the Academic Libraries survey: Why would electronic indexing/abstracting service expenses that aren't ongoing costs be reported in 'Other materials/service costs'?

FAQ

Reporting Expenses

1) Where do we report expenses for electronic journals and electronic indexing/abstracting services available on the Internet?

Report electronic journal and indexing/abstracting service expenses with 'Ongoing commitments to subscriptions' if

they require an annual fee. If not, report electronic journal expenses under 'One-time purchases of books, serial backfiles, and other materials' and electronic indexing/abstracting services under 'Other materials/service costs'.

### Response

Dear Anonymous,

Thank you for your feedback posted April 6, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

In response to your question, NCES asks that institutions report indexing/abstracting service expenses that are not ongoing cost in "All other materials/service costs" because indexing/abstracting services does not align with the other two categories that we collect for material/service expenses. These other two categories are "One-time purchases of books, serial backfiles, and other materials" and "Ongoing commitments to subscriptions."

Paid subscriptions for electronic journals and indexes/abstracts available via the Internet were reported with "Electronic serial" expenses under the previous Academic Libraries Survey (ALS). However, ALS was reintegrated into IPEDS in 2014 to create the current AL component. During this reintegration, NCES consolidated expenditure categories according to guidance provided through the IPEDS Technical Review Panel (TRP) #35, Reintegrating the Academic Libraries Survey into IPEDS. TRP #35 provided guidance for IPEDS to collapse items that were reported under electronic serial in the ALS survey to be reported as materials/services expenses in the current AL component. We believe that the changes in definitions/instructions discussed above should provide improved accuracy and quality of the data being reported. Thank you again for your question and feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comment related to agreement with prior comment (Comment number 43)

**Document:** ED-2016-ICCD-0020-0043

**Name:** Anonymous

I agree with this comment.

### Response

Dear Anonymous,

Thank you for your feedback posted April 6, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

It is not completely clear which of the comments you were agreeing with, but as this is comment 43 I am including the response to comment 42 in hope that it addresses your comment.

Thank you for submitting your question about reporting indexing/abstracting service expenses. In response to your question, NCES asks that institutions report indexing/abstracting service expenses that are not ongoing cost in "All other materials/service costs" because indexing/abstracting services does not align with the other two categories that we collect for material/service expenses. These other two categories are "One-time purchases of books, serial backfiles, and other materials" and "Ongoing commitments to subscriptions."

Paid subscriptions for electronic journals and indexes/abstracts available via the Internet were reported with "Electronic serial" expenses under the previous Academic Libraries Survey (ALS). However, ALS was reintegrated into IPEDS in 2014 to create the current AL component. During this reintegration, NCES consolidated expenditure categories according to guidance provided through the IPEDS Technical Review Panel (TRP) #35, Reintegrating



the Academic Libraries Survey into IPEDS. TRP #35 provided guidance for IPEDS to collapse items that were reported under electronic serial in the ALS survey to be reported as materials/services expenses in the current AL component. We believe that the changes in definitions/instructions discussed above should provide improved accuracy and quality of the data being reported. Thank you again for your question and feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

**Comments related to graduate students (Comment numbers 44, 47)**

**Document:** ED-2016-ICCD-0020-0044

**Name:** Brian Carolan



The Graduate School  
VOICE: 973-655-5147  
FAX: 973-655-7869

April 6, 2016

Kate Mullan  
Acting Director, Information Collection Clearance Division  
Privacy, Information and Records Management Services  
Office of Management  
U.S. Department of Education

**RE: CGS Response to Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019 (Federal Register Number 2016-03338)**

Dear Ms. Mullan,

As Associate Dean of The Graduate School at Montclair State University in Montclair, NJ, I appreciate the opportunity to provide comments and feedback on proposed modifications to the Integrated Postsecondary Education Data System (IPEDS) data collection instruments. Montclair State University, classified as Doctoral Research University—Moderate Research Activity by The Carnegie Classification of Institutions of Higher Education, offers over 100 programs (post-baccalaureate certificates, master's, and doctoral degrees) that serve approximately 4100 graduate students.

IPEDS is an essential data tool for the higher education community and offers basic data points for enrollment, degrees conferred, jobs created, and dollars spent by U.S. postsecondary institutions. Broadly speaking, I support the overarching theme of the proposed revisions that aims to reduce burden for institutions; however, at present, IPEDS data collection efforts have continued to place emphasis on baccalaureate education. Particularly, when it comes to the enrollment data, IPEDS, in its current form, does not offer a nuanced benchmark that is reflective of the graduate education community.

I encourage the Department of Education to disaggregate graduate student data reported in Part A – Fall Enrollment for Graduate Students, Fall Enrollment Summary, Fall Enrollment by Distance Education Status of the Fall Enrollment Form, and in Part A – Unduplicated Count, Part B – Instructional Activity in the 12-month Enrollment Form by master's degrees, doctor's degree-research/scholarship, doctor's degrees-professional practice, doctor's degrees-other, and post-baccalaureate certificate programs. Having disaggregated figures for all post-baccalaureate degree objectives will offer a more accurate picture of the state of graduate education. Moreover, this will allow institutions such as Montclair State University to identify enrollment patterns by degree objectives (post-baccalaureate certificate programs, master's degrees, etc.) and compare these patterns to peer institutions.

Thank you for your consideration of my concerns. I hope that the Department of Education will consider Montclair State University as a resource on this issue and other issues of importance to graduate education. If you have questions, please do not hesitate to call on me at 973.655.7175 or carolanb@mail.montclair.edu.

Regards,

A handwritten signature in black ink, appearing to read "Brian V. Carolan".

Brian V. Carolan  
Associate Dean

montclair.edu

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Document: ED-2016-ICCD-0020-0047

Name: Nancy Marcus



April 14, 2016

Kate Mullan  
Acting Director, Information Collection Clearance Division  
Privacy, Information and Records Management Services  
Office of Management  
U.S. Department of Education

RE: CGS Response to Comment Request; Integrated Postsecondary Education Data System  
(IPEDS) 2016-2019 (Federal Register Number 2016-03338)

Dear Ms. Mullan,

As Dean of the Graduate School at Florida State University in Tallahassee, FL, I appreciate the opportunity to provide comments and feedback on proposed modifications to the Integrated Postsecondary Education Data System (IPEDS) data collection instruments.

Florida State University is a Research 1 institution and one of two preeminent universities in the State of Florida. In fall 2015, 6,740 graduate students, 596 Law students, and 483 Medical students were enrolled in a degree program in one of our 17 schools and colleges. We offer master's degrees in 102 programs, advanced master's/specialist degrees in 19 programs, doctorates in 67 programs and two professional degrees (Law and Medicine). Each year the institution awards over 2,000 graduate and professional degrees.

IPEDS is an important data tool for the higher education community and offers basic data points for enrollment, degrees conferred, jobs created, and dollars spent by U.S. postsecondary institutions. At present, IPEDS data collection efforts have continued to place emphasis on baccalaureate education. Particularly, when it comes to the enrollment data, IPEDS, in its current form, does not provide information that is helpful in understanding demographic trends at the post-baccalaureate level.

In my capacity as Dean, I encourage the Department of Education to disaggregate graduate student enrollment data reported in Part A - Fall Enrollment for Graduate Students, Fall Enrollment Summary, Fall Enrollment by Distance Education Status of the Fall Enrollment Form, and in Part A - Unduplicated Count, Part B - Instructional Activity in the 12-month Enrollment Form by master's degrees, doctor's degree-research/scholarship, doctor's degrees-professional practice, doctor's degrees-other, and post-baccalaureate certificate programs. Having aggregate figures for all post-baccalaureate degree objectives will offer a more accurate picture of the state of U.S. graduate education.

Thank you for your consideration of my concerns. I hope that the Department will consider Florida State University as a resource on this issue and other issues of importance to graduate education. If you have questions, please do not hesitate to call on me at 850 644-3501 or nmarcus@fsu.edu.

Sincerely,

A handwritten signature in black ink that reads 'Nancy Marcus'.

Nancy Marcus

314 Westcott Building, Florida State University, P.O. Box 3061410, Tallahassee, FL 32306-1410  
Telephone 850.644.3501 • Fax 850.644.2969 • www.gradschool.fsu.edu

## Response

Dear Dr. Carolan and Dr. Marcus,

Thank you for your feedback dated April 8 and April 18, 2016, 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. We are grateful for this process and your comment.

In regard to your comment regarding your support for the overall goal to reduce burden, we appreciate the feedback and we continue to work to decrease burden for institutions whenever possible.

In regard to your comment regarding the need to disaggregate graduate student data reported in the Fall Enrollment and 12 Month Enrollment components, for this clearance process we do not have any research guide the collection

of these data. We have taken note of your concern and will consider it as an area for research and development for IPEDS and appreciate your willingness to serve as a resource in this area.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

**Comments related to graduate students (Comment numbers 46, 49)**

**Document:** ED-2016-ICCD-0020-0046

**Name:** Suzanne Ortega



One Dupont Circle, NW • Suite 230 • Washington, DC 20036-1146  
(202) 461-3852 • Fax (202) 461-3853 • www.cgsnet.org

April 8, 2016

Kate Mullan  
Acting Director, Information Collection Clearance Division  
Privacy, Information and Records Management Services  
Office of Management  
U.S. Department of Education

**RE: CGS Response to Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019 (Federal Register Number 2016-03338)**

Dear Ms. Mullan,

On behalf of the Council of Graduate Schools (CGS), I appreciate this opportunity to provide comments and feedback to Integrated Postsecondary Education Data System (IPEDS) 2016-2019 (Federal Register Number 2016-03338). CGS membership includes roughly 500 universities in the United States that annually award the vast majority of U.S. doctorates and master's degrees each year.

IPEDS is an important data tool for the higher education community and offers basic data points for enrollment, degrees conferred, jobs created, and dollars spent by U.S. postsecondary institutions. Also, the data collected via IPEDS establishes the "IPEDS universe," which serves as the most reliable reference point for various postsecondary sample survey projects. Broadly speaking, we support the overarching theme of the proposed revisions that aims to eliminate data points with low utility and reduce burden for institutions, including the proposed simplification of "Graduate assistants, by function" in the Human Resources (HR) Form. However, CGS also observes that IPEDS data collection efforts have continued to place their emphasis on baccalaureate education. Particularly, when it comes to the enrollment data, IPEDS, in its current form, does not offer a nuanced benchmark that is reflective of the graduate education community.

The IPEDS data collection instruments only asks aggregated enrollment data for all post-baccalaureate enrollment in both the 12-month Enrollment Form and Fall Enrollment Form. The term "graduate students" for the purpose of IPEDS includes a range of degree objectives: master's degrees, doctor's degree-research/scholarship, doctor's degrees-professional practice, doctor's degrees-other, and post-baccalaureate certificate programs. Yet, race/ethnic and gender compositions of these degree objectives, as well as modes of delivery (e.g., distance education) and enrollment intensity (e.g., full-time v. part-time) varies. For example, the most recent CGS/GRE Survey of Graduate Enrollment and Degrees indicated that women represented about 60% of master's enrollments, while they only constituted about one-half of US doctoral enrollments. Thus, having aggregated figures for all post-baccalaureate degree

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of Graduate Schools

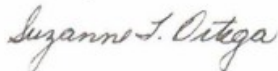
Western  
Association  
of Graduate Schools

objectives do not offer meaningful pictures that inform about the state of U.S. graduate education.

**Recommendation:** Disaggregate graduate student enrollment data reported in Part A – Fall Enrollment for Graduate Students, Fall Enrollment Summary, Fall Enrollment by Distance Education Status of the Fall Enrollment Form, and in Part A – Unduplicated Count, Part B – Instructional Activity in the 12-month Enrollment Form by master's degrees, doctor's degree-research/scholarship, doctor's degrees-professional practice, doctor's degrees-other, and post-baccalaureate certificate programs.

Furthermore, as the only national organization that represents master's and doctoral education in the United States, CGS wishes the Department of Education to consider us as a resource when exploring data tools that better inform the graduate education community. Specifically, we would appreciate opportunities to be a part of future IPEDS technical review panels (TRPs), as CGS has been represented in TRPs for other NCES data collection efforts, including National Postsecondary Student Aid Study and Baccalaureate & Beyond Longitudinal Study.

Sincerely,



Suzanne T. Ortega  
President

**Document:** ED-2016-ICCD-0020-0049

**Name:** Steven Matson



THE UNIVERSITY  
of NORTH CAROLINA  
at CHAPEL HILL

300 BYNUM HALL  
CAMPUS BOX 4010  
CHAPEL HILL, NC 27599-4010  
<http://gradschool.unc.edu>

T 919.966.2511  
F 919.966.4310  
[gradinfo@unc.edu](mailto:gradinfo@unc.edu)

April 15, 2016

Kate Mullan  
Acting Director, Information Collection Clearance Division  
Privacy, Information and Records Management Services  
Office of Management  
U.S. Department of Education

**RE: Response to Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019 (Federal Register Number 2016-03338)**

Dear Ms. Mullan,

In my capacity as Dean of The Graduate School at The University of North Carolina at Chapel Hill, I appreciate this opportunity to provide comments and feedback to Integrated Postsecondary Education Data System (IPEDS) 2016-2019 (Federal Register Number 2016-03338). UNC-Chapel Hill enrolls over 8,200 graduate students each year and awards over 2,500 graduate degrees on an annual basis.

IPEDS is an important data tool for the higher education community and offers basic data points for enrollment, degrees conferred, jobs created, and dollars spent by U.S. postsecondary institutions. Also, the data collected via IPEDS establishes the "IPEDS universe," which serves as the most reliable reference point for various postsecondary sample survey projects. Broadly speaking, I support the overarching theme of the proposed revisions that aims to eliminate data points with low utility and reduce burden for institutions, including the proposed simplification of "Graduate assistants, by function" in the Human Resources (HR) Form. However, IPEDS data collection efforts have continued to place their emphasis on baccalaureate education. Particularly, when it comes to the enrollment data, IPEDS, in its current form, does not offer a nuanced benchmark that is reflective of, and therefore highly useful to, the graduate education community.

The IPEDS data collection instruments only asks aggregated enrollment data for all post-baccalaureate enrollment in both the 12-month Enrollment Form and Fall Enrollment Form. The term "graduate students" for the purpose of IPEDS includes a range of degree objectives: master's degrees, doctor's degree-research/scholarship, doctor's degrees-professional practice, doctor's degrees-other, and post-baccalaureate certificate programs. Yet, race/ethnic and gender compositions of these degree objectives, as well as modes of delivery (e.g., distance education) and enrollment intensity (e.g., full-time v. part-time) varies. For example, the most recent CGS/GRE Survey of Graduate Enrollment and Degrees indicated that women represented about 60% of master's enrollments, while they only constituted about one-half of US doctoral enrollments. Thus, having aggregated figures for all post-baccalaureate degree

objectives do not offer meaningful pictures that inform about the state of U.S. graduate education.

**Recommendation:** Disaggregate graduate student enrollment data reported in Part A – Fall Enrollment for Graduate Students, Fall Enrollment Summary, Fall Enrollment by Distance Education Status of the Fall Enrollment Form, and in Part A – Unduplicated Count, Part B – Instructional Activity in the 12-month Enrollment Form by master's degrees, doctor's degree-research/scholarship, doctor's degrees-professional practice, doctor's degrees-other, and post-baccalaureate certificate programs.

Furthermore, please consider the Council Graduate School (CGS), which represents over 500 institutions conferring graduate degrees, as a resource when exploring data tools that better inform the graduate education community. Specifically, CGS would make informed contributions as part of future IPEDS technical review panels (TRPs), as CGS has been represented in TRPs for other NCEES data collection efforts, including National Postsecondary Student Aid Study and Baccalaureate & Beyond Longitudinal Study.

Sincerely,

Steven W. Matson, PhD  
Professor of Biology  
Dean, The Graduate School

## Response

Dear Drs. Ortega and Matson,

Thank you for your feedback dated April 8 and April 18, 2016, 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. We are grateful for this process and your comment.

In regard to your comment regarding your support for the overall goal to reduce burden, including the changes to the "Graduate Assistants, by function" in the Human Resources component, we appreciate the feedback as we continue to work to decrease burden for institutions whenever possible.

In regard to your comment regarding the need to disaggregate graduate student data reported in the Fall Enrollment and 12 Month Enrollment components, for this clearance process we do not have any research to guide the collection of these data. We have taken note of your concern and will consider it as an area for research and development for IPEDS and appreciate your willingness to serve as a resource in this area.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

**Comment related to OM, study abroad, and ADM (Comment number 48)**

**Document:** ED-2016-ICCD-0020-0054

**Name:** Joyce Smith

April 15, 2016

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The Honorable John B. King, Jr.  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

Docket No. ED-2016-ICCD-0020

Dear Secretary King,

On behalf of the National Association for College Admission Counseling (NACAC), thank you for the opportunity to submit comments on the National Center for Educational Statistics' proposed changes to the 2016-2019 Integrated Postsecondary Education Data System (IPEDS). Founded in 1937, NACAC is a membership association of over 15,000 professionals who help students plan for and pursue postsecondary education. NACAC members include school counselors, college admission officers, community based organizations, independent educational consultants, and others with experience advising students and families on making informed postsecondary plans. In addition to our advocacy work, NACAC is engaged in research on higher education access and enrollment trends.

**Proposed Changes to the Outcome Measures Form**

NACAC is pleased that the Department plans to introduce an Outcome Measure to capture Pell Grant recipients' successful completion of their degrees. We believe these data will directly help students and families make important decisions about college enrollment and bolster essential research on college success. It is an unfortunate, but undeniable, reality that low-income students do not fare equally at every institution of higher education. Disaggregating Outcome Measures by Pell Grant recipient status will shed light on the relative strength of an institution in supporting its low-income students on a path toward graduation. This information, combined with other considerations, such as cost of attendance, may be critical to a student weighing her enrollment options.



National Association for  
College Admission Counseling

1050 N Highland Street, Suite 400 | Arlington, VA 22201 | 800.822.6285 | [nacaacnet.org](http://nacaacnet.org)



National Association for  
College Admission Counseling

1050 N Highland Street, Suite 400 | Arlington, VA 22201 | 800.822.8285 | nacacnet.org

The Department has many tools at its disposal, such as the College Navigator and College Scorecard, to help students access and understand the implications of certain institutional data. Incorporating Pell Grant recipient-specific Outcome Measures could strengthen these tools by allowing low-income students to better judge how institutions support students like themselves not only get *to*—but also get *through*—college. The proposed changes constitute a promising first step in collecting robust data that can benefit student consumers.

In addition to helping students make decisions, Pell Grant recipient outcome data will help researchers understand the factors that determine why some institutions graduate Pell Grant recipients at higher rates than others. For example, these data will help answer questions such as, do Pell Grant recipients graduate at higher rates at colleges of a certain size? Does studying alongside a critical mass of other Pell Grant recipients correlate with higher levels of degree completion? By separating out Outcome Measure data for Pell Grant recipients, researchers will be able to glean which institutional characteristics or practices contribute to successful completion. Although further disaggregating each Outcome Measure cohort by Pell status would be most insightful, NACAC hopes that even the proposed all-inclusive data for Pell Grant recipients will positively inform institutional decision-makers and lead to widespread adoption of best practices.

Although NACAC strongly supports the inclusion of Outcome Measures for Pell Grant recipients in IPEDS data, we are concerned that some state funding models that base allocation of state institutional aid on student outcomes may encourage institutions to reduce enrollment of low-income students. A recent study in the *Journal of Education Finance* shows that institutions that receive budget allocations under a “performance-based funding” model receive less Pell Grant dollars than institutions not subject to this funding model. See Robert Kelchen & Luke Stedrak, *Does Performance-Based Funding Affect Colleges’ Financial Priorities?* 41 *J. of Educ. Fin.* 302 (2016). Performance-based funding models reward institutions based on various criteria, which may include number of low-income students enrolled, as well as overall graduation rate and/or graduation rates for low-income students, among other factors. Because of the weight frequently given to graduation rates, institutions may be incentivized to minimize enrollment of low-income students, who tend to graduate at a far lower rate than their high-income peers. NACAC hopes that the availability of Pell Grant recipient Outcome Measures in IPEDS will not exacerbate this trend of reducing access, but rather will provide policymakers and institutional leaders with the data and research they need to optimize low-income student success at all institutions.

NACAC has no objection to the inclusion of students studying abroad or studying at a branch campus in a foreign country in institutional Outcome Measures. We are pleased that many students have the opportunity to pursue a global postsecondary education, and we believe that including these students in Outcome Measures data will encourage



## Response

Dear Ms. Smith,

Thank you for your feedback posted April 18, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

The comments are 1. NACAC supports the Department's plans to introduce an Outcome Measures to capture Pell Grant recipients' successful completion of their degrees, 2. NACAC does not object to the inclusion of students studying abroad or studying at the branch campus in a foreign country in institutional Outcome Measures, and 3. NACAC supports the propose change from "Don't Know" to "Considered But Not Required" on the Admissions survey component.

NCES appreciates your comments of support on the addition of the Pell Grant recipient cohort, which will provide more information on these low-income students' success rates, and instructions to include study abroad students to the Outcome Measures (OM) survey component. Thank you also for supporting the improvements to the Admissions survey component, which will provide a better and clearer understanding of institutions' admissions considerations.

Sincerely,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### **Comment related to Pell Grad Rates (Comment number 50)**

**Document:** ED-2016-ICCD-0020-0050

**Name:** Edward Sullivan

April 13, 2016

Kate Mullan  
Acting Director, Information Collection Clearance Division  
Privacy, Information and Records Management Services  
Office of Management  
U.S. Department of Education

**RE: Comment on Integrated Postsecondary Education Data System (IPEDS) 2016-2019 Collection Package (Federal Register Number 2016-03338, OMB Control Number 1850-0582)**

Dear Ms. Mullan,

We submit the following comments in response to the referenced 60-day Notice and request for comment on the Integrated Postsecondary Education Data System (IPEDS) 2016-2019 collection.

Our comments are focused on the collection of a new Pell Grant Cohort within the Outcomes Measures survey. We appreciate the significant investment in students represented by the Pell grant program and the rationale for collecting this information in IPEDS. At the California State University, our robust financial aid program enables access to a high-quality education while maintaining affordability for students. In 2014-15, eighty percent of CSU students received financial aid, and fifty-five percent of CSU undergraduates were Pell Grant recipients.

**Suggested Changes and Rationale**

- We would request that the Department clarify or reconsider the proposed determination of the Pell Grant Cohort based on receipt of Pell anytime in eight years covered in the Outcome Measures reporting period, as stated in Supporting Statement Part A. Doing so introduces a Pell graduation rate measure that is inconsistent with prior Departmental guidance and introduces biases into the calculation of a Pell graduation rate that may not be desirable.
  - **Suggested Change:** Pell Grant Cohort includes students from the four OM cohorts who received a Pell Grant in the period used for determining the cohort (e.g. fall term or full year of entry).

CSU Campuses  
Bakersfield  
Channel Islands  
Chico  
Dominguez Hills  
East Bay

Fresno  
Fullerton  
Humboldt  
Long Beach  
Los Angeles  
Maritime Academy

Monterey Bay  
Northridge  
Pomona  
Sacramento  
San Bernardino  
San Diego

San Francisco  
San José  
San Luis Obispo  
San Marcos  
Sonoma  
Stanislaus

Our suggested change results in a rate that is consistent with the recommendations of TRP #24 and the Department's final guidance on disclosure requirements required under the Higher Education Opportunity Act of 2008 (34 CFR 668.45). It also aligns to standard professional practice in the computation of such rates by higher education institutions and research groups, including a recent national survey of Pell graduation rates conducted by the Education Trust ([https://edtrust.org/wp-content/uploads/2014/09/ThePellPartnership\\_EdTrust\\_20152.pdf](https://edtrust.org/wp-content/uploads/2014/09/ThePellPartnership_EdTrust_20152.pdf)).

All institutions are currently required to generate Pell graduation rates based on status at entry, and it is not sufficiently clear from the notice why the Department is suggesting a departure in this policy guidance. We would expect many reporting institutions would be confused by this change or would fail to recognize it without further explanation and outreach from the Department.

Defining the Pell cohort cumulatively introduces additional biases into the Pell graduation rate and makes it more difficult to interpret.

- Since a student must be enrolled to receive a Pell grant, students that do not persist will not have the same opportunity to be counted as Pell participants as those students that do persist. This leads to upward bias in the graduation rate for the Pell cohort relative to the non-Pell cohort, as both inclusion in the Pell cohort and graduation rates increase with persistence. We cannot know or appropriately account for whether students who leave the institution would have been otherwise been retained if they had applied for aid, but we would not assume these outcomes are unrelated to income status and financial considerations.
- Pell program requirements, as well students' financial situation, can change over the reporting period. By basing the cohort on receipt at entry, those temporal effects do not alter the composition of the cohort over time.

We understand and appreciate the complexity of implementing a Pell graduation rate that satisfies the information needs of many constituencies. Attempting to be inclusive of all students touched by the Pell program during their undergraduate career in this rate will likely produce measures that are less useful than rates based on the student's Pell status at entry, which is the current standard.

Thank you for the opportunity to comment on the proposed changes to IPEDS.

Sincerely,



Edward Sullivan, Ph.D.  
Assistant Vice Chancellor, Academic Research and Resources

## Response

Dear Dr. Sullivan,

Thank you for your feedback dated April 18, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

NCES appreciates your support to begin collecting outcome data on Pell Grant recipients. We also recognize your comment to change the directions when identifying the Pell Grant recipients at point of cohort entry instead of throughout the measurement period of 8 years. However, collecting at point of entry means the data metric would be undercounting the number of Pell recipients during the 8 year measurement. In other words, NCES would not account for the students who did not receive a Pell Grant their first year, but were recipients in their successive years. Other commenters have cited that loss would be between 11% (APLU) - 25% (TICAs). As an important federal program that supports the postsecondary access of low-income Americans, we cannot afford to undercount any of these students. To ensure there is no confusion between the full-time Pell Grant graduation rate disclosure that must be disclosed by institutions, NCES will propose to include those cohort counts and resulting rates in the Graduation Rate (GR) survey with specific instructions for that collection. In addition, NCES will specify in the Outcome Measures (OM) instructions that the collected Pell data are not the Pell Grant disclosure rates that will be collected in GR survey, and further make clarification between the proposed GR 150% Pell Cohort disclosure rate and OM Pell Grant completion rates at 6 years and 8years.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comments related to Pell Cohort in Outcome Measures Comments 51, 52, 55, 59, 60

**Document:** ED-2016-ICCD-0020-0051

**Name:** Christine Keller

Please see the attached letter from the Association of Public & Land-grant Universities in response to the proposed addition of a Pell Grant recipient cohort to the Outcome Measures (OM) Survey component of the Integrated Postsecondary Education Data System (IPEDS).

For questions, please contact Christine Keller at [ckeller@aplu.org](mailto:ckeller@aplu.org).

Thank you.



April 18, 2016

Mr. Richard Reeves  
IPEDS Program Director  
National Center for Education Statistics  
Potomac Center Plaza  
550 12th Street SW, Room 4134  
Washington, DC 20202

Dear Mr. Reeves:

This letter is in response to the proposed addition of a Pell Grant recipient cohort to the Outcome Measures (OM) Survey component of the Integrated Postsecondary Education Data System (IPEDS).

It is encouraging that the Department of Education (ED) is taking steps to include indicators of the postsecondary success of Pell recipients in IPEDS. Many in the higher education community, including the PostsecData Collaborative, have advocated for the addition of Pell graduation rates to IPEDS.<sup>i</sup> For example, a 2008 IPEDS Technical Review Panel (TRP) recommended establishing a Pell Grant sub-cohort in the Graduate Rate Survey.<sup>ii</sup> Additionally, the Committee on Measures of Student Success (CMSS) called for ED to direct the National Center for Education Statistics (NCES) to add Pell graduation rates to IPEDS and convene a TRP to determine how to do so.<sup>iii</sup>

These data would provide students, policymakers, institutions, and policy researchers with information on how outcomes for low-income students vary across institutions and how they compare with the outcomes of more well-resourced classmates. While Sec. 488(a)(3) of the Higher Education Opportunity Act of 2008 (HEOA) requires institutions to disclose graduation rates disaggregated based on Pell status,<sup>iv</sup> research has shown inadequate compliance with this disclosure requirement.<sup>v</sup> Furthermore, as a disclosure requirement, these data are difficult to collect and use in a comprehensive way because gathering them requires contacting thousands of individual colleges.<sup>vi</sup> APLU strongly supports the addition of low-income student outcomes to IPEDS.

APLU supports the majority of recommendations outlined in a separate letter from the Postsecondary Data Collaborative (PostsecData) and is one of the signatories. As stated in that letter, there are several alternative methods for including Pell outcomes data with the IPEDS collection and each are preferred by different members of the higher education community. **APLU strongly recommends incorporating a Pell cohort into the GRS over the other alternatives that involve additions or changes within the OM survey** - as described in the Federal Register or as described within the PostsecData letter. APLU recommends the addition to the GRS for several reasons.

- It is consistent with the current HEOA disclosure requirements and the recommendation of TRP #24.<sup>vii</sup>
- It would be comparable to pre-existing and commonly used graduation rates, including those disaggregating by race and gender. The comparability is very important to provide an anchor and a context for the reporting of graduation rates for a new subgroup, particularly one as high-profile as the Pell cohort.
- It would be a more meaningful and understandable metric for most audiences and help to minimize inaccurate interpretations and comparisons. The proposed OM Pell cohort combining varying

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**B. Make the results more useful by improving how the Pell cohort and outcome data are specified**

Members of the higher education community who have advocated for and plan on using Pell outcome data have serious concerns regarding the proposed implementation of this new measure and expect significant barriers to robust and beneficial analysis of the data as specified. To remedy these challenges, we propose the following:

1. **Do not combine students of varying attendance and enrollment patterns into one Pell cohort.** The proposed approach of using an aggregated cohort raises the most serious concerns. If implemented as proposed, the Pell OM cohort would mix widely varying student populations into one, irrespective of attendance intensity and enrollment status. First-time, transfer, full-time, and part-time students experience different enrollment and completion trajectories,<sup>xxi</sup> and, when combined, create a heterogeneous cohort. It will therefore be impossible to tell whether the varying Pell graduation rates across colleges are a result of true differences in outcomes for Pell students or because of meaningful differences in the types of students institutions enroll and attendance patterns of those enrolled.

This heterogeneity is also problematic when comparing Pell outcomes with non-Pell outcomes because Pell recipients and non-recipients attend part-time and transfer at different rates.<sup>xxii</sup> As a result, the distribution of attendance and enrollment patterns within the Pell cohort will be different from the distribution within the non-Pell cohort, making comparisons between the two cohorts difficult to interpret. Additionally, the aggregated cohort seems to be in conflict with TRP #24's recommendation, which called for a first-time full-time (FTFT) Pell sub-cohort as well as a first-time part-time (FTPT) Pell sub-cohort if a part-time cohort were to be established.<sup>xxv</sup>

Furthermore, the results will not be comparable to other cohorts typically used in higher education. In fact, the aggregated cohort deviates from current field practice. For example:

- a. *Complete College America (CCA)* collects Pell graduation rates for nine separate cohorts – certificate, associate, and bachelor's-seeking crossed with FTFT, FTPT, and transfer (full- and part-time combined).<sup>xx</sup>
  - b. *The Student Achievement Measure (SAM)* calculates student outcomes separately for FTFT and transfer full-time students in their bachelor's model. They also include optional bachelor's cohorts for first-time part-time and transfer part-time students.<sup>xxi</sup> In the associate/certificate model, they collect two cohorts: full-time students (including first-time and transfer) and part-time students (including first-time and transfer).<sup>xxii</sup> While SAM does not currently disaggregate for Pell status, it does set a clear precedent of reporting outcomes separately for cohorts defined by attendance and enrollment status. SAM will also be adding the capability for reporting Pell student outcomes as a sub-cohort to existing models in fall 2016.<sup>xxiii</sup>
  - c. *Statutory requirements* for disclosure pertain to the completion/graduation rate of certificate/degree-seeking full-time undergraduate students, and are required by law to be disaggregated by gender and race/ethnicity as well as Pell receipt, receipt of subsidized Stafford loans but not Pell, and neither the specified loans nor Pell.<sup>xx</sup> Based on this disclosure requirement, The Education Trust's "The Pell Partnership" research calculates Pell graduation rates using a FTFT cohort.<sup>xx</sup>
2. **Define Pell recipients as those who receive Pell at entry, not those who receive Pell ever.** Voluntary data initiatives have led the way in defining and collecting Pell graduation rates, and several define Pell receipt based on status at entry for cohort-based measures, like graduation rates.<sup>xx</sup> We recommend defining Pell at entry for outcome data in IPEDS, as well. While identifying Pell recipients at entry will

omit an estimated 11 percent of students per cohort who become low-income after their first year or apply for aid and are accurately captured as low-income later in their college careers,<sup>xxxii</sup> the benefits of defining Pell at entry outweigh this downside:

- a. *Timeliness*: Defining Pell ever requires waiting for the full measurement time period (8 years) to elapse before reporting outcome information, whereas defining Pell at entry allows for earlier reporting as the cohort progresses. While the OM survey only requires retrospective reporting at the 8-year mark, it could evolve in the future to include more frequent, earlier reporting. Even if not reported to IPEDS more frequently, institutions likely will want to check on the progress of their Pell cohort at earlier intervals, providing them with more real-time data to inform institutional policies, rather than waiting 8 years for retrospective data. These interim checks will be difficult if Pell is not defined at cohort entry.
- b. *Consistency*: Other elements of OM and GRS cohorts (attendance status, enrollment intensity, race/ethnicity, gender) all are defined at entry, so defining Pell at entry would be consistent with other IPEDS cohort-based elements. Furthermore, all dependent students who remain enrolled for 8 years will age out of dependency status while enrolled, making them more likely to become Pell-eligible in later years. While these students are legitimately Pell-eligible, combining them with students who qualified for Pell for the majority of their college enrollment muddies the proxy and builds inconsistencies into the measurement.
- c. *TRP recommendations*: TRP #24 recommends using Pell at entry, saying “those cohort members who received Pell dollars (disbursements) during the official student financial aid year for the year in which the cohort is established” should be counted as Pell recipients.<sup>xxxiii</sup>
- d. *Clarity*: Defining Pell ever raises questions about how to classify students who receive Pell Grants only in year 7 or 8 because their Pell status would be different at the 6-year and 8-year outcome points. Including year 7/8 Pell recipients in the Pell cohort for 6-year outcomes seems imprecise, but excluding them at year 6 and including them at year 8 is inconsistent and creates comparability problems.
- e. *Insubstantial value added*: Defining Pell ever does not produce substantially different graduation rates than defining Pell at entry. Among students who receive Pell at entry, 35 percent attain a credential at their first institution, compared with 34 percent of students who received Pell ever.<sup>xxxiv</sup> This trend of similar results holds across institution types, with the largest difference occurring at private non-profit four-year institutions (49 percent completion for Pell at entry, compared with 51 percent for Pell ever). Students who receive Pell ever are slightly (5.5 percentage points) more likely to transfer than students who only receive Pell at entry, perhaps because they receive Pell at the subsequent institution.<sup>xxxv</sup> Given the relatively small difference in results alongside the substantial benefits outlined above, Pell at entry is a better option.

To account for the estimated one-quarter of Pell recipients per cohort who receive Pell at some point but not in their first year,<sup>xxxvi</sup> the IPEDS Completions survey could disaggregate the number of completers by whether they received Pell ever. Completer counts are more suited to a Pell ever proxy because the counts are retrospective by nature. Furthermore, defining Pell at entry for cohort measures and Pell ever for completer counts would mirror the methodology implemented by CCA and Access to Success (A2S).<sup>xxxvii</sup>

3. **Require all institutions to report Pell outcomes, not only degree-granting institutions.** Only degree-granting institutions are required to complete the OM survey, so by including a Pell cohort in the OM

survey but not the GRS, the field will still miss outcome information for approximately 436,000 Pell recipients attending nearly 2,700 non-degree-granting institutions.<sup>xxxiii</sup>

4. **Report Pell outcomes after 100, 150, and 200 percent of program time instead of after 6 and 8 years.** Reporting outcomes only at 6 and 8 years makes the proposed metric very retrospective, with more lag in reporting, and would only provide data on community college students at 300 and 400 percent of time. While these extended timeframes may be useful for community colleges, they should be additional options, rather than replacements for the shorter timeframes required in HEA. The 6- and 8-year timeframes are built into the OM survey, so if Pell completion outcomes were to remain in the OM rather than the GRS then this recommendation would require changes to the survey itself. For more detailed recommendations on improving the OM survey, please refer to [PostsecData's](#) December 2014 comments.
5. **Disaggregate cohorts by credential sought.** Meaningful examination of student outcomes necessitates an understanding of student intentions. Several voluntary data initiatives (including SAM, CCA, and A2S) disaggregate cohorts accordingly.<sup>xxxiv</sup> Additionally, institutions that offer multiple credentials already are required to report the graduation rates of bachelor's degree-seekers separately from other credential-seekers, and must further report the program length for each federal aid recipient to the National Student Loan Data System (NSLDS).<sup>xxxv</sup> With these reporting measures in place, institutions should already be prepared to report credential sought.

APLU values the Department's efforts to improve postsecondary data systems, supports efforts to collect more comprehensive data on student outcomes, and commends NCES for taking this step in what is certainly the right direction. Ultimately, APLU supports the development of a student-level data collection to streamline collection and reporting, allowing for the most useful metrics to be calculated with less concern about reporting burden. APLU also strongly recommends replacing the GRS metrics with a model similar to the Student Achievement Measure (SAM).

Thank you for the opportunity to comment on the proposed changes as well as for thoughtful consideration of our feedback and recommendations. If you have any questions, please do not hesitate to call or email me, [ckeller@aplu.org](mailto:ckeller@aplu.org) or 202-478-6043.

Sincerely,

Christine M Keller  
Vice President, Research & Policy Analysis  
Executive Director, Student Achievement Measure

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<sup>i</sup> Engle, J., Huijsman, M., Long, A.A., & Voight, M. (March 2014), Mapping the postsecondary data domain: problems and possibilities, *Institute for Higher Education Policy*, retrieved from [http://www.ihep.org/sites/default/files/uploads/docs/pubs/mapping\\_the\\_postsecondary\\_data\\_domain\\_-\\_main\\_report\\_revised.pdf](http://www.ihep.org/sites/default/files/uploads/docs/pubs/mapping_the_postsecondary_data_domain_-_main_report_revised.pdf); *Institute for Higher Education Policy* (November 2013), IHEP comments in response to technical request for information on the Postsecondary Institutional Rating System (PIRS), retrieved from <http://www.ihep.org/press/opinions-and-statements/ihep-comments-response-technical-request-information-postsecondary>; *Institute for Higher Education Policy* (December 2014), PostsecData comments on IPEDS Outcome Measures Technical Review Panel, retrieved from



[http://www.ihep.org/sites/default/files/uploads/docs/press/postsecdata\\_comments\\_on\\_ipeds\\_outcome\\_measures\\_trp\\_dec\\_2014.pdf](http://www.ihep.org/sites/default/files/uploads/docs/press/postsecdata_comments_on_ipeds_outcome_measures_trp_dec_2014.pdf)

<sup>ii</sup> RTI International, Report and suggestions from IPEDS Technical Review Panel #24: Collecting GRS data for part-time students and Pell Grant recipients (accessed 2016 March 11), retrieved from [https://edsurveys.rti.org/IPEDS\\_TRP\\_DOCS/prod/documents/TRP\\_24\\_Summary\\_final.pdf](https://edsurveys.rti.org/IPEDS_TRP_DOCS/prod/documents/TRP_24_Summary_final.pdf)

<sup>iii</sup> U.S. Department of Education (December 2011), Committee on Measures of Student Success: Report to Secretary of Education Arne Duncan, retrieved from <http://www2.ed.gov/about/bdscomm/list/cmss-committee-report-final.pdf>

<sup>iv</sup> Higher Education Opportunity Act, Public Law 110-315, 110th Congress (2008).

<sup>v</sup> Carey, K. & Kelly, A.P. (November 2011), The truth behind higher education disclosure laws, *American Enterprise Institute*, retrieved from [http://www.aei.org/wp-content/uploads/2011/11/truthhighereddisclosurelaws\\_185621335060.pdf](http://www.aei.org/wp-content/uploads/2011/11/truthhighereddisclosurelaws_185621335060.pdf)

<sup>vi</sup> Nichols, A.H. (September 2015), The Pell partnership: Ensuring a shared responsibility for low-income student success, *The Education Trust*, retrieved from [https://edtrust.org/wp-content/uploads/2014/09/ThePellPartnership\\_EdTrust\\_20152.pdf](https://edtrust.org/wp-content/uploads/2014/09/ThePellPartnership_EdTrust_20152.pdf)

<sup>vii</sup> Higher Education Opportunity Act, Public Law 110-315, 110th Congress (2008); RTI International, Report and suggestions from IPEDS Technical Review Panel #24.

<sup>viii</sup> Nichols.

<sup>ix</sup> While Pell receipt is a frequently used proxy for low-income students, it is not perfect. Some students, particularly at low-cost institutions like community colleges, would qualify for Pell, but do not receive it simply because they do not apply for federal financial aid. When using Pell as a proxy for income status, these students will be counted as non-Pell, even though they are low-income. However, Pell remains the best available proxy.

<sup>x</sup> Supporting statement part A 60-day Federal Register notice (February 19, 2016) for Docket ED-2016-ICCD-0020: Agency information collection activities; Comment request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019, 81 Fed. Reg. 8181 (February 18, 2016).

<sup>xi</sup> College costs are defined here as average total in-state tuition, fees, room, and board at public four-year colleges.

Projected college costs for 2016-17 were estimated by using the average annual increase in costs over the most recent five years. Figures for Pell Grant maximum amount are for 2016-17. Calculations by The Institute for College Access & Success using *College Board* (2015), Trends in college pricing 2015 (Table 2), retrieved from <http://bit.ly/1Pyv2sl> and U.S. Department of Education, Pell Grant payment and disbursement schedules, retrieved from <http://ifap.ed.gov/dpclatters/GEN1601.html>

<sup>xii</sup> Chen, J., Chiang, Y., Dundar, A., Park, E, Shapiro, D., Torres, V., & Ziskin, M. (November 2012), Completing college: A national view of student attainment rates (Signature report no. 4), *National Student Clearinghouse Research Center*, retrieved from [https://nscresearchcenter.org/wp-content/uploads/NSC\\_Signature\\_Report\\_4.pdf](https://nscresearchcenter.org/wp-content/uploads/NSC_Signature_Report_4.pdf)

<sup>xiii</sup> On average, 14 percent of Pell Grant recipients in 2003-04 began as part-time students in that same year, while 24.1 percent of non-recipients began part-time. An average 25.9 percent of 2003-04 Pell recipients who started that year would later transfer, compared with 31.6 percent of non-recipients. IHEP analysis of U.S. Department of Education, National Center for Education Statistics, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-up (BPS:04/09), computation by NCES PowerStats Version 1.0 on March 15, 2016, variables used were ATTEND, PROUT6Y, & PELL04, weight variable was WTBO00.

<sup>xiv</sup> RTI International, Report and suggestions from IPEDS Technical Review Panel #24.

<sup>xv</sup> *Complete College America*, Complete College America common college completion metrics technical guide, last updated April 23, 2015, retrieved from <http://completecollege.org/wp-content/uploads/2014/11/2014-Metrics-Technical-Guide-Final-04022014.pdf>

<sup>xvi</sup> *The Student Achievement Measure*, SAM methodology for calculating the bachelor's degree-seeking cohort metric, updated August 20, 2014, retrieved from <https://s3.amazonaws.com/studentachievementmeasure/SAM+Permanent+Links/SAM+Bachelors+Model+Methodology.pdf>

<sup>xvii</sup> *The Student Achievement Measure*, SAM methodology for calculating the associate degree- and certificate-seeking cohort metric, July 1, 2013, retrieved from <https://s3.amazonaws.com/studentachievementmeasure/SAM+Permanent+Links/SAM+Associate+%26+Certificate+Model+Methodology.pdf>

<sup>xviii</sup> Hinds, T. & Keller, C., email communication from Association of Public & Land-grant Universities (APLU), March 29, 2016.

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<sup>xxx</sup> 20 USC 1092(a)(1), accessed 2016 March 16, retrieved from <https://www.gpo.gov/fdsys/pkg/USCODE-2014-title20/pdf/USCODE-2014-title20-chap28-subchapIV-partF-sec1092.pdf>

<sup>xxx</sup> Nichols.

<sup>xxx</sup> Complete College America and Access to Success both count Pell recipients as those who received Pell at entry for their graduation rate measures, while the Voluntary Framework for Accountability identifies Pell recipients as those who have ever received Pell. A2S and CCA also disaggregate the total number of degrees conferred by Pell ever. *Complete College America*, Complete College America common college completion metrics technical guide; *The Education Trust* (May 2012), Replenishing opportunity in America: The 2012 midterm report of public higher education systems in the Access to Success initiative (technical appendix), retrieved from [http://edtrust.org/wp-content/uploads/2013/10/A2S\\_2012\\_Appendix.pdf](http://edtrust.org/wp-content/uploads/2013/10/A2S_2012_Appendix.pdf); *Voluntary Framework of Accountability* (November 2015), Voluntary Framework of Accountability metrics manual version 4.0, retrieved from <http://vfa.aacc.nche.edu/Documents/VFAMetricsManual.pdf>

<sup>xxxx</sup> IHEP analysis indicates 11 percent of the BPS:04/09 cohort did not receive Pell at entry in 2003-04 but did receive Pell at some point, by 2009. Computation by NCES [PowerStats](#) Version 1.0 on March 29, 2016, variables used were PELL04 & PELL04, weight variable was WTB000.

<sup>xxxx</sup> *RTI International*, Report and suggestions from IPEDS Technical Review Panel #24.

<sup>xxxx</sup> IHEP analysis of BPS:04/09, computation by NCES [PowerStats](#) Version 1.0 on March 17, 2016, variables used were PELL04, PELL09, PROUT6Y, & FSECTOR, weight variable was WTB000.

<sup>xxxx</sup> On average, 26.2 percent of students who received Pell at entry in 2003-04 later transferred. Students who were counted as having received Pell at any point through 2009 had transferred from first institution at a rate of 31.7 percent overall. IHEP analysis of BPS:04/09, computation by NCES [PowerStats](#) Version 1.0 on April 5, 2016, variables used were PELL04, PELL09, & PROUT6Y, weight variable was WTB000.

<sup>xxxx</sup> Of those who did not receive Pell at entry in 2003-04, 17.1 percent would later receive Pell while 82.9 percent would not. Of those who received Pell by 2009, 76.5 percent received Pell at entry in 2003-04 and 23.5 percent did not. IHEP analysis of BPS:04/09, computation by NCES [PowerStats](#) Version 1.0 on March 29, 2016, variables used were PELL09 & PELL04, weight variable was WTB000.

<sup>xxxx</sup> *Complete College America*, Complete College America common college completion metrics technical guide; *The Education Trust* (May 2012).

<sup>xxxx</sup> IHEP analysis of IPEDS 2014 undergraduate students receiving Pell Grants (14) at non-degree-granting institutions, [IPEDS Data Center](#) on March 18, 2016.

<sup>xxxx</sup> *The Student Achievement Measure*, SAM methodology for calculating the bachelor's degree-seeking cohort metric; *The Student Achievement Measure*, SAM methodology for calculating the associate degree- and certificate-seeking cohort metric; *Complete College America*, Complete College America common college completion metrics technical guide; *The Education Trust* (May 2012).

<sup>xxxx</sup> *U.S. Department of Education Office of Federal Student Aid* (October 2015), National Student Loan Data System enrollment reporting guide, retrieved from <http://ifap.ed.gov/nsldsmaterials/attachments/NewNSLDSenrollmentReportingGuide.pdf>

**Document:** ED-2016-ICCD-0020-0052

**Name:** Kati Haycock

Attached, please find comments from the Education Trust.



The Education Trust

Closing the gaps in opportunity and achievement, pre-k through college.

April 18, 2016

Director, Information Collection Clearance Division  
U.S. Department of Education  
400 Maryland Avenue SW  
LBJ Room 2E-103  
Washington, DC 20202

Dear Director, Information Collection Clearance Division:

Please accept The Education Trust's comments on the proposed information collection (Docket Number ED-2016-ICCD-0020) posted February 18, 2016.

A college degree is the surest path to social and economic mobility in this country. As the primary federal aid program to help low-income students pay for college, the Pell Grant program is a critical investment in the nation's economy and society.

Pell gives more than 8.5 million students—most from families making \$40,000 or less—access to the postsecondary education they might not have otherwise received. Nearly half of all Latino undergraduate students and more than 60 percent of African American students receive Pell. Moreover, Pell represents a significant investment of federal resources—roughly \$30.6 billion in 2014-15.

But for the scale and importance of this investment, we know alarmingly little about college outcomes for Pell recipients. Institution-level Pell graduation rates are not included in any public, federal data collection. Indeed, in order to equip students, parents, and policymakers with information on how well institutions across the country are serving Pell students compared with other students, The Education Trust had to undertake a year-long [data collection effort](#).

The data we collected shed light on important trends, including that Pell students are much more likely to attend institutions with lower graduation rates for all students and much less likely to attend institutions that graduate most of their students. The data also show that there are hundreds of colleges that successfully serve Pell students, and that these institutions exist across a range of selectivity, sector, and mission. These institutions provide promise and proof that getting more Pell students through college is an attainable goal—if leaders make completion and equity a top priority.

Pell graduation data should be an important factor in any low-income student's decision about which college to attend. These data should also be used to identify and learn from successful institutional practices and policies—and, conversely, to shine a light on institutions that need to improve. To serve these purposes, annual Pell graduation rates for all institutions must be publicly available. That's why The Education Trust wholeheartedly supports including graduation rates for Pell recipients in the Integrated Postsecondary Education Data System (IPEDS) and appreciates the U.S. Department of Education's commitment to increased transparency and better, more actionable data.

However, we're concerned that the current proposal will generate institutional Pell graduation rates that will have limited practical utility. As such, our comments offer broad support for an expanded data collection to include Pell graduation rates and detailed recommendations for improving on the proposal.

## Assessing the current proposal

The proposal to create a Pell sub-cohort from students included in each of the four cohorts in the Outcome Measures (OM) Survey would limit the usefulness of the data and the ability of data users to make useful comparisons for two main reasons:

- This proposal does not disaggregate the Pell cohort by enrollment status (first- versus non-first-time) or attendance status (full- versus part-time). But institutions differ significantly in the types of students they enroll, meaning that comparisons between institutions should take enrollment and attendance patterns into account. Otherwise, differences in Pell graduation rates between institutions may be due to differences in the types of students enrolled rather than institutions' ability to serve low-income students. Faulty comparisons would undermine the efforts of policymakers to hold institutions accountable for the success of all of their students, institutional leaders to benchmark their performance against similar institutions, and students and families to make informed college choices.

Moreover, creating cohorts that don't distinguish between attendance and enrollment patterns would make it difficult to assess real differences in outcomes between Pell recipients and other students. The enrollment patterns of students that receive Pell and those that don't are not always the same. Creating cohorts that don't take these enrollment differences into account could make the comparisons between Pell and non-Pell students look worse than they actually are.

- The OM framework doesn't allow for disaggregation by award type. But there is a marked difference—in both value and average time-to-degree—between bachelor's degrees and other award types. Without disaggregation by award type, graduation rates for the Pell cohort will be misleading at institutions where significant percentages of students pursue multiple award types. Moreover, without disaggregation by award type, the OM Survey would include six- and eight-year outcomes for schools that primarily award certificates and associate degrees, which is too much time to measure success.

In addition to these data quality and utility concerns, it's also important to note that the current proposal does not satisfy the disclosure requirements of the 2008 Higher Education Opportunity Act (HEOA). Under HEOA, institutions are required to disclose the completion/graduation rates of certificate- and degree-seeking full-time students, disaggregated by Pell status. Under this proposal, institutions would still be required to make these disclosures, in addition to reporting the new Pell cohort in the OM Survey. While one of the main justifications for the addition of the Pell sub-cohort to the OM Survey is the minimal added institutional burden, the misalignment with HEOA disclosure clearly contradicts that.

## Recommendations

*We recommend that the U.S. Department of Education incorporate a Pell sub-cohort into the Graduation Rate Survey (GRS) component of IPEDS.* Collecting Pell outcomes through the GRS would have three primary benefits:

- Allowing the Pell cohort to be disaggregated by award type;
- Generating data that are comparable to pre-existing and commonly used graduation rates, such as those disaggregated by race and gender; and
- Minimizing burden by aligning with existing HEOA disclosure requirements. It's important to note here that including a Pell sub-cohort in the GRS does not necessitate that institutions disaggregate the Pell sub-cohort by race/ethnicity and gender.

The GRS Pell sub-cohort should be based on receipt of Pell at entry. This is simpler and would align the Pell data with other reporting categories in the GRS and other data sources.

We acknowledge the downside of this proposal—that like all graduation rates in GRS, a Pell sub-cohort would exclude part-time and transfer students. But in addition to the benefits listed above, we believe that the benefit of not mixing students with different enrollment and attendance patterns makes this the best approach for getting useful data on Pell and non-Pell graduation rates without significantly increasing institutional burden.

Collection through the GRS is our recommended approach. *If the Department instead chooses to pursue the collection through the OM Survey, we recommend that the Pell collection be added as a category within each of the four OM cohorts, rather than constructing a Pell sub-cohort from each of the four cohorts. In addition, we recommend that the OM survey be amended to disaggregate each cohort by degree sought, and report outcomes at 100 percent, 150 percent, and 200 percent of time.* These improvements on the proposal to collect Pell outcomes through the OM Survey would increase burden, but would make the OM collection useful and allow for comprehensive and meaningful analyses.

#### **Conclusion**

We appreciate the Department's efforts to fill what has, for far too long, been a void in the information available to higher education stakeholders—from policymakers to institutional leaders, advocates to students and families. Our recommendations are aimed at making sure that we fill the void the right way—with useful, meaningful data.

We thank you for your time and attention to the important matter and welcome the opportunity to provide any additional information as you move forward with this important effort.

Cordially,



Kati Haycock  
The Education Trust

**Document:** ED-2016-ICCD-0020-0055

**Name:** Mamie Voight

Attached is a letter from the Postsecondary Data Collaborative in response to the proposed addition of a Pell Grant recipient cohort to the Outcomes Measures Survey component of the Integrated Postsecondary Education Data System



April 18, 2016

Mr. Richard Reeves  
IPEDS Program Director  
National Center for Education Statistics  
Potomac Center Plaza  
550 12th Street SW, Room 4134  
Washington, DC 20202

Dear Mr. Reeves:

This letter is submitted on behalf of the Postsecondary Data Collaborative (PostsecData), in response to the proposed addition of a Pell Grant recipient cohort to the Outcome Measures (OM) Survey component of the Integrated Postsecondary Education Data System (IPEDS). PostsecData is comprised of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

It is very encouraging that the Department of Education (ED) is taking steps to include indicators of the postsecondary success of Pell recipients in IPEDS. The higher education community – including PostsecData – has frequently advocated for the addition of Pell graduation rates to IPEDS.<sup>1</sup> For example, a 2008 IPEDS Technical Review Panel (TRP) recommended establishing a Pell Grant sub-cohort in the Graduate Rate Survey.<sup>2</sup> Additionally, the Committee on Measures of Student Success (CMSS) called for ED to direct the National Center for Education Statistics (NCES) to add Pell graduation rates to IPEDS and convene a TRP to determine how to do so.<sup>3</sup>

These data could provide students, policymakers, institutions, and policy researchers with information on how outcomes for low-income students vary across institutions and how they compare with the outcomes of more well-resourced classmates. While Sec. 488(a)(3) of the Higher Education Opportunity Act of 2008 (HEOA) requires institutions to disclose graduation rates disaggregated based on Pell status,<sup>4</sup> research has shown inadequate compliance with this disclosure requirement.<sup>5</sup> Furthermore, as a disclosure requirement, these data are difficult to collect and use in a comprehensive way because gathering them requires contacting thousands of individual colleges.<sup>6</sup> We applaud ED for responding to the clarion call for the addition of low-income student outcomes to IPEDS. To ensure these data are as useful as possible, we make the following recommendations that advise on appropriate ways to use the results, propose a series of technical specifications, and present alternate solutions that would implement those specifications:

*A. Use Pell graduation rates to measure success for low-income students, not the effectiveness of the Pell Grant program*

*B. Make the results more useful by improving how the Pell cohort and outcome data are specified*

1. Do not combine students of varying attendance and enrollment patterns into one Pell cohort
2. Define Pell recipients as those students who receive Pell when they initially enroll in college (Pell at entry), not those who receive Pell at any point while enrolled in college (Pell ever)
3. Require all institutions to report outcomes for Pell students, not only degree-granting institutions
4. Report Pell outcomes after 100, 150, and 200 percent of program time instead of (or in addition to) after 6 and 8 years
5. Disaggregate cohorts by credential sought

*C. Implement an alternate solution for collecting essential data on Pell student outcomes*

1. Incorporate a Pell cohort into the Graduation Rate Survey (GRS)
2. Disaggregate each OM cohort by Pell, using the existing OM survey
3. Disaggregate each OM cohort by Pell, using a revised OM survey

1

Each of these recommendations is discussed in detail below.

**A. Use Pell graduation rates to measure success for low-income students, not the effectiveness of the Pell Grant program**

In light of the widespread support for additional data on how low-income students are served by their respective institutions, NCES' proposal is a positive one. When available, Pell (and non-Pell) graduation rate data can help identify institutions that are serving low-income students well and closing gaps between them and their higher income classmates, while also shining a light on campuses that could serve low-income students better.<sup>7</sup> Pell receipt serves as a useful proxy for income status, illuminating trends in outcomes by economic status.<sup>8</sup>

However, proper use of these data is key, as Pell graduation rates are not an appropriate measure of effectiveness for the Pell Grant program as the Federal Register notice suggests when referring to the new measure as a means "to assess the effectiveness of this large federal investment to undergraduate students."<sup>9</sup> Pell Grants make college possible for nearly eight million Americans who rely on the grants to attend and complete college. Many improvements to the Pell program are necessary to increase its effectiveness, including increasing the grant's purchasing power beyond the less than 30 percent of four-year public college costs that the maximum grant currently covers.<sup>10</sup> If institution-level Pell graduation rates prove to be lower than rates for non-Pell students, those findings should not be interpreted as a failure of the program itself, but rather spur institutional improvement efforts and further investment in the Pell program. We cannot stress enough how important it is to maintain focus on the use of a Pell receipt indicator as a proxy to determine how low-income students are served at the postsecondary level.

**B. Make the results more useful by improving how the Pell cohort and outcome data are specified**

Members of the higher education community who have advocated for and plan on using Pell outcome data have serious concerns regarding the proposed implementation of this new measure and expect significant barriers to robust and beneficial analysis of the data as specified. To remedy these challenges, we propose the following:

1. Do not combine students of varying attendance and enrollment patterns into one Pell cohort. The proposed approach of using an aggregated cohort raises the most serious concerns. If implemented as proposed, the Pell OM cohort would mix widely varying student populations into one, irrespective of attendance intensity and enrollment status. First-time, transfer, full-time, and part-time students experience different enrollment and completion trajectories,<sup>11</sup> and, when combined, create a heterogeneous cohort. It will therefore be impossible to tell whether the varying Pell graduation rates across colleges are a result of true differences in outcomes for Pell students or because of meaningful differences in the types of students institutions enroll and attendance patterns of those enrolled.

This heterogeneity is also problematic when comparing Pell outcomes with non-Pell outcomes because Pell recipients and non-recipients attend part-time and transfer at different rates.<sup>12</sup> As a result, the distribution of attendance and enrollment patterns within the Pell cohort will be different from the distribution within the non-Pell cohort, making comparisons between the two cohorts difficult to interpret. Additionally, the aggregated cohort seems to be in conflict with TRP #24's recommendation, which called for a first-time full-time (FTFT) Pell sub-cohort as well as a first-time part-time (FTPT) Pell sub-cohort if a part-time cohort were to be established.<sup>13</sup>

Furthermore, the results will not be comparable to other cohorts typically used in higher education. In fact, the aggregated cohort deviates from current field practice. For example:

- a. Complete College America (CCA) collects Pell graduation rates for nine separate cohorts – certificate, associate, and bachelor's-seeking crossed with FTFT, FTPT, and transfer (full- and part-time combined).<sup>14</sup>

- b. *The Student Achievement Measure (SAM)* calculates student outcomes separately for FTFT and transfer full-time students in their bachelor’s model. They also include optional bachelor’s cohorts for first-time part-time and transfer part-time students.<sup>15</sup> In the associate/certificate model, they collect two cohorts: full-time students (including first-time and transfer) and part-time students (including first-time and transfer).<sup>16</sup> While SAM does not currently disaggregate for Pell status, it does set a clear precedent of reporting outcomes separately for cohorts defined by attendance and enrollment status. SAM will also be adding the capability for reporting Pell student outcomes as a sub-cohort to existing models in fall 2016.<sup>17</sup>
  - c. *Statutory requirements* for disclosure pertain to the completion/graduation rate of certificate/degree-seeking full-time undergraduate students, and are required by law to be disaggregated by gender and race/ethnicity as well as Pell receipt, receipt of subsidized Stafford loans but not Pell, and neither the specified loans nor Pell.<sup>18</sup> Based on this disclosure requirement, The Education Trust’s “The Pell Partnership” research calculates Pell graduation rates using a FTFT cohort.<sup>19</sup>
2. Define Pell recipients as those who receive Pell at entry, not those who receive Pell ever. Voluntary data initiatives have led the way in defining and collecting Pell graduation rates, and several define Pell receipt based on status at entry for cohort-based measures, like graduation rates.<sup>20</sup> We recommend defining Pell at entry for outcome data in IPEDS, as well. While identifying Pell recipients at entry will omit an estimated 11 percent of students per cohort who become low-income after their first year or apply for aid and are accurately captured as low-income later in their college careers,<sup>21</sup> the benefits of defining Pell at entry outweigh this downside:
- a. *Timeliness:* Defining Pell ever requires waiting for the full measurement time period (8 years) to elapse before reporting outcome information, whereas defining Pell at entry allows for earlier reporting as the cohort progresses. While the OM survey only requires retrospective reporting at the 8-year mark, it could evolve in the future to include more frequent, earlier reporting. Even if not reported to IPEDS more frequently, institutions likely will want to check on the progress of their Pell cohort at earlier intervals, providing them with more real-time data to inform institutional policies, rather than waiting 8 years for retrospective data. These interim checks will be difficult if Pell is not defined at cohort entry.
  - b. *Consistency:* Other elements of OM and GRS cohorts (attendance status, enrollment intensity, race/ethnicity, gender) all are defined at entry, so defining Pell at entry would be consistent with other IPEDS cohort-based elements. Furthermore, all dependent students who remain enrolled for 8 years will age out of dependency status while enrolled, making them more likely to become Pell-eligible in later years. While these students are legitimately Pell-eligible, combining them with students who qualified for Pell for the majority of their college enrollment muddies the proxy and builds inconsistencies into the measurement.
  - c. *TRP recommendations:* TRP #24 recommends using Pell at entry, saying “those cohort members who received Pell dollars (disbursements) during the official student financial aid year for the year in which the cohort is established” should be counted as Pell recipients.<sup>22</sup>
  - d. *Clarity:* Defining Pell ever raises questions about how to classify students who receive Pell Grants only in year 7 or 8 because their Pell status would be different at the 6-year and 8-year outcome points. Including year 7/8 Pell recipients in the Pell cohort for 6-year outcomes seems imprecise, but excluding them at year 6 and including them at year 8 is inconsistent and creates comparability problems.
  - e. *Insubstantial value added:* Defining Pell ever does not produce substantially different graduation rates than defining Pell at entry. Among students who receive Pell at entry, 35 percent attain a credential at their first institution, compared with 34 percent of students who received Pell ever.<sup>23</sup> This trend of similar results holds across institution types, with the largest difference occurring at private non-profit four-year



institutions (49 percent completion for Pell at entry, compared with 51 percent for Pell ever). Students who receive Pell ever are slightly (5.5 percentage points) more likely to transfer than students who only receive Pell at entry, perhaps because they receive Pell at the subsequent institution.<sup>24</sup> Given the relatively small difference in results alongside the substantial benefits outlined above, Pell at entry is a better option.

To account for the estimated one-quarter of Pell recipients per cohort who receive Pell at some point but not in their first year,<sup>25</sup> the IPEDS Completions survey could disaggregate the number of completers by whether they received Pell ever. Completer counts are more suited to a Pell ever proxy because the counts are retrospective by nature. Furthermore, defining Pell at entry for cohort measures and Pell ever for completer counts would mirror the methodology implemented by CCA and Access to Success (A2S).<sup>26</sup>

3. **Require all institutions to report Pell outcomes, not only degree-granting institutions.** Only degree-granting institutions are required to complete the OM survey, so by including a Pell cohort in the OM survey but not the GRS, the field will still miss outcome information for approximately 436,000 Pell recipients attending nearly 2,700 non-degree-granting institutions.<sup>27</sup>
4. **Report Pell outcomes after 100, 150, and 200 percent of program time instead of (or in addition to) after 6 and 8 years.** Reporting outcomes only at 6 and 8 years makes the proposed metric very retrospective, with more lag in reporting, and would only provide data on community college students at 300 and 400 percent of time. While these extended timeframes may be useful for community colleges, they should be additional options, rather than replacements for the shorter timeframes required in HEA. The 6- and 8-year timeframes are built into the OM survey, so if Pell completion outcomes were to remain in the OM rather than the GRS then this recommendation would require changes to the survey itself. For more detailed recommendations on improving the OM survey, please refer to PostsecData's December 2014 comments.
5. **Disaggregate cohorts by credential sought.** Meaningful examination of student outcomes necessitates an understanding of student intentions. Several voluntary data initiatives (including SAM, CCA, and A2S) disaggregate cohorts accordingly.<sup>28</sup> Additionally, institutions that offer multiple credentials already are required to report the graduation rates of bachelor's degree-seekers separately from other credential-seekers, and must further report the program length for each federal aid recipient to the National Student Loan Data System (NSLDS).<sup>29</sup> With these reporting measures in place, institutions should already be prepared to report credential sought.

**C. Implement an alternate solution for collecting essential data on Pell student outcomes**

Incorporating the above recommendations, we put forward a series of alternatives to the method of including Pell outcome data proposed in the Federal Register. We recognize that each approach has benefits and drawbacks that must be considered. Several partner organizations are submitting separate comments that make the case for one or more of these options.

1. **Incorporate a Pell cohort into the GRS: Add Pell (at entry) as a disaggregate to the GRS component of IPEDS, in-line with extant HEOA disclosure requirements and the recommendation of TRP #24.**<sup>30</sup> The primary limitation of this approach is that the resulting Pell graduation rates would be limited to FTFT students, which are not representative of the entire student body at many institutions. However, it would be consistent with as well as comparable to pre-existing and commonly used graduation rates, such as those disaggregated by race and gender. Incorporating Pell as a disaggregate in the GRS would address all the recommendations listed above, including disaggregating bachelor's from associate/certificate-seekers and reporting on the 100 percent, 150 percent, and

200 percent timeframe. Furthermore, it would minimize burden by aligning with the HEOA disclosure requirement that institutions are already required to calculate.

The notice in the Federal Register states burden and confidentiality issues are associated with incorporating Pell graduation rates into the GRS instead of the OM survey.<sup>31</sup> However, these issues can be overcome. Simply including a Pell sub-cohort in the GRS should not necessitate disaggregating the Pell sub-cohort by race/ethnicity and gender. Rather, the GRS could maintain the race/ethnicity and gender disaggregates as-is and add a separate Pell sub-cohort that does not disaggregate further. The Federal Register notice also cites the potential to calculate non-Pell outcomes as a justification for using OM, but non-Pell outcomes could be calculated using the GRS as well.

2. Disaggregate each OM cohort by Pell, using the existing OM survey: Add Pell recipients to the OM survey as a variable for disaggregation for each of the four established cohorts, rather than a separate cohort that aggregates important and distinct elements of the others. This approach would not address the long 6- and 8-year reporting timeframes or the disaggregation by credential level, but it would have the benefit of capturing more than FTFT students. Most importantly, it would produce separate results for cohorts of differing attendance and enrollment statuses. It would require more institutional effort to report these four Pell cohorts than Option #1 would require.
3. Disaggregate each OM cohort by Pell, using a revised OM survey: Add Pell recipients to the OM survey as a variable for disaggregation for each of the four established cohorts rather than a separate cohort, refine the OM survey to disaggregate each cohort by level of degree sought, and adjust the reporting timeframe. The PostsecData Collaborative published a letter in response to RTI's *Report and Suggestions from IPEDS Technical Review Panel 45: Outcome Measures* in December 2014 that made detailed recommendations as to how this disaggregation for more robust analysis could be accomplished.<sup>32</sup> This solution would produce the most comprehensive results, but would require the greatest institutional reporting effort.

	Option 1	Option 2	Option 3
Includes more than FTFT		X	X
Aligns with HEOA disclosure	X		X
Allows for comparisons with graduation rates by race/ethnicity and gender	X		X
Disaggregates by credential level	X		X
Reports at timely intervals	X		X

Most importantly, in designing a Pell completion rate metric, we urge the Department to avoid combining students of differing attendance and enrollment statuses into one Pell recipient cohort, and we emphasize the importance of framing the data's purpose as advancing educational equity and institutional improvement rather than program evaluation.

This letter is supported by 15 organizations committed to high-quality postsecondary data. We truly value the Department's efforts to improve postsecondary data systems, we support efforts to collect more comprehensive data on student outcomes, and we commend NCES for taking this step in what is certainly the right direction. Our hope is that, by providing multiple alternatives to the proposed measures, NCES will have not only the additional information and substantive feedback it seeks from the higher education community, but the freedom to adopt a measure that truly helps us best understand how to support millions of low-income students and the institutions that serve them. Moreover, student-level data collection would streamline collection and reporting, allowing for the most useful metrics to be



calculated with less concern about reporting burden, so we support the development of such a system. Thank you for the opportunity to comment on the proposed changes as well as for thoughtful consideration of our feedback and recommendations. If you have any questions, please do not hesitate to call or email Mamie Voight at [mvoight@ihep.org](mailto:mvoight@ihep.org) or (202) 587-4967.

Sincerely,

Association of Public & Land-grant Universities  
Campaign for College Opportunity  
Center for Law and Social Policy  
Complete College America  
Data Quality Campaign  
Georgetown Center on Education and the Workforce  
Institute for Higher Education Policy  
National Association for College Admission Counseling  
National College Access Network  
National Skills Coalition  
New America  
Pell Institute for the Study of Opportunity in Higher Education  
Southern Education Foundation  
The Education Trust  
Western Interstate Commission for Higher Education  
Young Invincibles

<sup>1</sup> Engle, J., Huelsman, M., Long, A.A., & Voight, M. (March 2014), *Mapping the postsecondary data domain: problems and possibilities*, retrieved from [http://www.ihep.org/sites/default/files/uploads/docs/pubs/mapping\\_the\\_postsecondary\\_data\\_domain\\_-\\_main\\_report\\_revised.pdf](http://www.ihep.org/sites/default/files/uploads/docs/pubs/mapping_the_postsecondary_data_domain_-_main_report_revised.pdf); Institute for Higher Education Policy (November 2013), IHEP comments in response to technical request for information on the Postsecondary Institutional Rating System (PIRS), retrieved from <http://www.ihep.org/press/opinions-and-statements/ihep-comments-response-technical-request-information-postsecondary>; Institute for Higher Education Policy (December 2014), PostsecData comments on IPEDS Outcome Measures Technical Review Panel, retrieved from [http://www.ihep.org/sites/default/files/uploads/docs/press/postsecdata\\_comments\\_on\\_ipeds\\_outcome\\_measures\\_trp\\_dec\\_2014.pdf](http://www.ihep.org/sites/default/files/uploads/docs/press/postsecdata_comments_on_ipeds_outcome_measures_trp_dec_2014.pdf)

<sup>2</sup> RTI International, *Report and suggestions from IPEDS Technical Review Panel #24: Collecting GRS data for part-time students and Pell Grant recipients*, retrieved March 11, 2016 from [https://edsurveys.rti.org/IPEDS\\_TRP\\_DOCS/prod/documents/TRP\\_24\\_Summary\\_final.pdf](https://edsurveys.rti.org/IPEDS_TRP_DOCS/prod/documents/TRP_24_Summary_final.pdf)

<sup>3</sup> U.S. Department of Education (December 2011), *Committee on Measures of Student Success: Report to Secretary of Education Arne Duncan*, retrieved from <http://www2.ed.gov/about/bdscomm/list/cmss-committee-report-final.pdf>

<sup>4</sup> Higher Education Opportunity Act, Public Law 110-315, 110th Congress (2008).

<sup>5</sup> Carey, K. & Kelly, A.P. (November 2011), *The truth behind higher education disclosure laws*, retrieved from [http://www.aei.org/wp-content/uploads/2011/11/truthhigherdisclosurelaws\\_185621335060.pdf](http://www.aei.org/wp-content/uploads/2011/11/truthhigherdisclosurelaws_185621335060.pdf)

<sup>6</sup> Nichols, A.H. (September 2015), *The Pell partnership: Ensuring a shared responsibility for low-income student success*, The Education Trust, retrieved from [https://edtrust.org/wp-content/uploads/2014/09/ThePellPartnership\\_EdTrust\\_20152.pdf](https://edtrust.org/wp-content/uploads/2014/09/ThePellPartnership_EdTrust_20152.pdf)

<sup>7</sup> Nichols.

<sup>8</sup> While Pell receipt is a frequently used proxy for low-income students, it is not perfect. Some students, particularly at low-cost institutions like community colleges, would qualify for Pell, but do not receive it simply because they do not apply for federal financial aid. When using Pell as a proxy for income status, these students will be counted as non-Pell, even though they are low-income. However, Pell remains the best available proxy.

<sup>9</sup> Supporting statement A: 60-day Federal Register notice (February 19, 2016) for Docket ED-2016-ICCD-0020: Agency information collection activities; Comment request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019, 81 Fed. Reg. 8181 (February 18, 2016).

<sup>10</sup> Note: College costs are defined here as average total in-state tuition, fees, room, and board at public four-year colleges. Projected college costs for 2016-17 were estimated by using the average annual increase in costs over the most recent five years. Figures for Pell Grant maximum amount are for 2016-17. Source: Analysis by The Institute for College Access & Success using College Board (2015), *Trends in college pricing 2015* (Table 2), retrieved from <http://bit.ly/1Pv2sJ> and U.S. Department of Education, Office of Federal Student Aid (2016, January 29), *Pell Grant payment and disbursement schedules*, retrieved from <http://ifap.ed.gov/dpclatters/GEN1601.html>

<sup>11</sup> Chen, J., Chiang, Y., Dundar, A., Park, E., Shapiro, D., Torres, V., & Ziskin, M. (November 2012), *Completing college: A national view of student attainment rates*, retrieved from [https://nscresearchcenter.org/wp-content/uploads/NSC\\_Signature\\_Report\\_4.pdf](https://nscresearchcenter.org/wp-content/uploads/NSC_Signature_Report_4.pdf)

<sup>12</sup> Note: On average, 14 percent of Pell Grant recipients in 2003-04 began as part-time students in that same year, while 24.1 percent of non-recipients began part-time. An average 25.9 percent of 2003-04 Pell recipients who started that year would later transfer, compared with 31.6 percent of non-recipients. Source: IHEP analysis of U.S. Department of Education, National Center for Education Statistics, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-up (BPS:04/09), computation by NCES PowerStats Version 1.0 on March 15, 2016, variables used were ATTEND, PROUT6Y, & PELL04, weight variable was WT8000.

<sup>13</sup> RTI International, *Report and suggestions from IPEDS Technical Review Panel #24*.

<sup>14</sup> Complete College America (2015, April 23), *Complete College America common college completion metrics technical guide*, retrieved from <http://completecollege.org/wp-content/uploads/2014/11/2014-Metrics-Technical-Guide-Final-04022014.pdf>

<sup>15</sup> The Student Achievement Measure (2014, August 20), *SAM methodology for calculating the bachelor's degree-seeking cohort metric*, retrieved from <https://s3.amazonaws.com/studentachievementmeasure/SAM+Permanent+Links/SAM+Bachelors+Model+Methodology.pdf>

<sup>16</sup> The Student Achievement Measure (2013, July 1), *SAM methodology for calculating the associate degree- and certificate-seeking cohort metric*, retrieved from <https://s3.amazonaws.com/studentachievementmeasure/SAM+Permanent+Links/SAM+Associate+%26+Certificate+Model+Methodology.pdf>

<sup>17</sup> Hinds, T. & Keller, C., email communication from Association of Public & Land-grant Universities, March 29, 2016.

<sup>18</sup> 20 USC 1092(a)(1), accessed 2016 March 16, retrieved from <https://www.gpo.gov/fdsys/pkg/USCODE-2014-title20/pdf/USCODE-2014-title20-chap28-subchapIV-partF-sec1092.pdf>

<sup>19</sup> Nichols.

<sup>20</sup> Note: Complete College America and Access to Success both count Pell recipients as those who received Pell at entry for their graduation rate measures, while the Voluntary Framework for Accountability identifies Pell recipients as those who have ever received Pell. A2S and CCA also disaggregate the total number of degrees conferred by Pell ever. Source: Complete College America (2015, April 23); The Education Trust (May 2012), *Replenishing opportunity in America: The 2012 midterm report of public higher education systems in the Access to Success initiative (technical appendix)*, retrieved from [http://edtrust.org/wp-content/uploads/2013/10/A2S\\_2012\\_Appendix.pdf](http://edtrust.org/wp-content/uploads/2013/10/A2S_2012_Appendix.pdf); Voluntary Framework of Accountability (November 2015), *Voluntary Framework of Accountability metrics manual version 4.0*, retrieved from <http://vfa.aacc.nche.edu/Documents/VFAMetricsManual.pdf>

<sup>21</sup> IHEP analysis indicates 11 percent of the BPS:04/09 cohort did not receive Pell at entry in 2003-04 but did receive Pell at some point, by 2009. Computation by NCES PowerStats Version 1.0 on March 29, 2016, variables used were PELL04, PELL09, weight variable was WTB000.

<sup>22</sup> RTI International, *Report and suggestions from IPEDS Technical Review Panel #24*.

<sup>23</sup> IHEP analysis of BPS:04/09, computation by NCES PowerStats Version 1.0 on March 17, 2016, variables used were PELL04, PELL09, PROUT6Y, & FSECTOR, weight variable was WTB000.

<sup>24</sup> Note: On average, 26.2 percent of students who received Pell at entry in 2003-04 later transferred. Students who were counted as having received Pell at any point through 2009 had transferred from first institution at a rate of 31.7 percent overall. Source: IHEP analysis of BPS:04/09, computation by NCES PowerStats Version 1.0 on April 5, 2016, variables used were PELL04, PELL09, & PROUT6Y, weight variable was WTB000.

<sup>25</sup> Note: Of those who did not receive Pell at entry in 2003-04, 17.1 percent would later receive Pell while 82.9 percent would not. Of those who received Pell by 2009, 76.5 percent received Pell at entry in 2003-04 and 23.5 percent did not. Source: IHEP analysis of BPS:04/09, computation by NCES PowerStats Version 1.0 on March 29, 2016, variables used were PELL04, PELL09, weight variable was WTB000.

<sup>26</sup> Complete College America (2015, April 23); The Education Trust (May 2012).

<sup>27</sup> IHEP analysis of IPEDS 2014, undergraduate students receiving Pell Grants (14) at non-degree-granting institutions, IPEDS DataCenter on March 18, 2016.

<sup>28</sup> The Student Achievement Measure (2014, August 20); The Student Achievement Measure (2013, July 1); Complete College America (2015, April 23); The Education Trust (May 2012).

<sup>29</sup> U.S. Department of Education Office of Federal Student Aid (October 2015), *National Student Loan Data System enrollment reporting guide*, retrieved from <http://ifap.ed.gov/nsldsmaterials/attachments/NewNSLDSenrollmentReportingGuide.pdf>

<sup>30</sup> Higher Education Opportunity Act, Public Law 110-315, 110th Congress (2008); RTI International, *Report and suggestions from IPEDS Technical Review Panel #24*.

<sup>31</sup> Supporting statement A: 60-day Federal Register notice (February 19, 2016).

<sup>32</sup> Institute for Higher Education Policy (December 2014), PostsecData comments on IPEDS Outcome Measures Technical Review Panel, retrieved from [http://www.ihep.org/sites/default/files/uploads/docs/press/postsecdata\\_comments\\_on\\_ipeds\\_outcome\\_measures\\_trp\\_dec\\_2014.pdf](http://www.ihep.org/sites/default/files/uploads/docs/press/postsecdata_comments_on_ipeds_outcome_measures_trp_dec_2014.pdf)

**Document:** ED-2016-ICCD-0020-0059  
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Mr. Richard Reeves  
IPEDS Program Director  
National Center for Education Statistics  
Potomac Center Plaza  
550 12th Street SW, Room 4134  
Washington, DC 20202

Re: Agency Information Collection Activities; Comment Request; Integrated  
Postsecondary Education Data System (IPEDS) 2016-2019  
Docket ID# ED-2015-ICCD-0020

April 18, 2016

Dear Mr. Reeves,

Thank you for the opportunity to submit comments in response to the addition of a Pell Grant recipient cohort to the Outcome Measures (OM) Survey of the Integrated Postsecondary Education Data System (IPEDS). This comment is submitted on behalf of the Center for American Progress' postsecondary education policy team.

The Center for American Progress (CAP) is an independent, nonpartisan think tank dedicated to improving the lives of all Americans through progressive ideas and action. CAP's postsecondary education policy program is built on the belief that robust and complete data is a crucial element of improving equity, access to high-quality programs, and completion outcomes in higher education.

As such, we believe measures to gauge the postsecondary success of Pell recipients are an important addition to IPEDS and applaud the Department of Education for addressing the outcomes of all students. These data will allow students, institutions of higher education, and policymakers to see how student outcomes vary by institution and how well institutions are doing in serving the needs of low-income students.

While the addition of a Pell recipient cohort is a welcome one, the proposed manner in which the data will be collected and reported raises concerns about its usefulness. As proposed, a standalone Pell recipient cohort measured in a limited manner creates barriers to beneficial analysis. This comment addresses these concerns and provides the following recommendations for how the Department can ensure that these data are useful and comparable to other measures available through IPEDS:

- Do not combine Pell recipients of varying enrollment and attendance patterns
- Require non-degree granting institutions to report Pell outcomes

Progressive Ideas for a Strong, Just and Free America

- Report Pell outcomes for 100, 150, and 200 percent of program time
- Add Pell outcomes to the Graduation Rate Survey

### **1. Do not combine Pell recipients of varying enrollment and attendance patterns**

As proposed, Pell recipients would be grouped into one cohort that combines first-time, full-time, part-time, and transfer students. Combining students of varying enrollment and attendance patterns into one group is problematic because students in these groups have different persistence and completion outcomes.<sup>1</sup> For example, full-time students at public four-year institutions have a 70 percent six year completion rate whereas part-time students have a 15.7 percent completion rate.<sup>2</sup> The combined completion rate of both full- and part-time students would make it difficult to discern whether a school's Pell completion rate is truly a measure of low-income student outcomes or simply reflective of student enrollment and intensity patterns.

Furthermore, as our colleagues from the Postsecondary Data Collaborative note, Pell recipients attend part-time and transfer at different rates than their non-Pell peers. For example, 14 percent Pell recipients began as part-time students and 25.9 percent of Pell recipients transferred.<sup>3</sup> On the other hand, 24.1 percent of non-Pell recipients began part-time and 31.6 percent of non-recipients transferred at some point during their postsecondary education.<sup>4</sup> These differences would make it difficult to compare outcomes between recipients and non-recipients.

Instead of a combined standalone cohort, Pell recipients should be reported as sub-groups of each of the four OM survey cohorts. This means that full-time first-time, part-time first-time, full-time non-first-time, and part-time, non-first-time entering student cohorts should all be disaggregated by Pell receipt. Doing so would ensure that the data are both meaningful enough to make comparisons across institutions and comparable to non-Pell recipient outcomes.

### **2. Require non-degree granting institutions to report Pell outcomes**

Students and policymakers need to be able to understand Pell-recipient outcomes at all institutions. However, non-degree granting institutions are currently not required to

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<sup>1</sup> National Student Clearinghouse Research Center, "Completing College: A National View of Student Attainment Rates – Fall 2009 Cohort," available at <https://nscresearchcenter.org/signaturereport10/>.

<sup>2</sup> Ibid.

<sup>3</sup> See comment by Postsecondary Data Collaborative.

<sup>4</sup> Ibid.

complete the OM survey, and would not have to submit data on Pell completion rates. Given that non-degree granting institutions serve over 400,000 Pell-recipients, and receive over \$1.6 billion in federal Pell grant funding each year, it is important that students, policymakers, and the public are aware of student outcomes and how well these particular institutions serve their low-income students.<sup>5</sup> Therefore, Pell-grant completion reporting should be required of all institutions, not just degree granting.

### **3. Report Pell outcomes for 100, 150, and 200 percent of program time**

The OM survey only requires institutions to report completion rates after six and eight years after entry.<sup>6</sup> Although these data can be valuable, outcomes need to be known on much earlier timeframes. This is particularly true for two-year community colleges which aim for students to complete much sooner than six or eight years, but also valuable for four-year students. At both two- and four-year schools, some are likely to perform better than others at getting low-income students to complete on time. Knowing earlier completion rates could provide valuable decision making information for prospective low-income students. The Department should create reporting requirements for 100, 150, and 200 percent of program time in the OM Survey or alternatively include a Pell cohort in the Graduation Rate Survey.

### **4. Add Pell outcomes data to the Graduation Rate Survey**

While the Graduation Rate Survey (GRS) is limited in that it only measures first-time, full-time students, it offers the ability to disaggregate outcomes by race, gender, and associate/certificate-seeker status. It also includes completion at 100, 150, and 200 percent of time. Pell should be added as a disaggregate of the GRS so that first-time full-time Pell-recipient outcomes are consistent and comparable to other commonly used graduation rate information from IPEDS.

These proposed recommendations could improve the collective understanding of low-income student outcomes and provide valuable information on how best to support these students over the current proposed measure. We thank you for taking up this important improvement in student-level data and the opportunity to comment on the proposed changes. For further information, please contact Antoinette Flores at [aflores@americanprogress.org](mailto:aflores@americanprogress.org).

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<sup>5</sup> CAP analysis of IPEDS 2014.

<sup>6</sup> National Center for Education Statistics, "Outcome Measures Survey frequently Asked Questions," available at [https://nces.ed.gov/ipeds/pdf/2015\\_OutcomeMeasures\\_FAQs.pdf](https://nces.ed.gov/ipeds/pdf/2015_OutcomeMeasures_FAQs.pdf)



# COMPLETE COLLEGE AMERICA

April 18, 2016

Mr. Richard Reeves  
IPEDS Program Director, National Center for Education Statistics  
Potomac Center Plaza, 550 12th Street SW, Room 4134  
Washington, DC 20202

Re: Complete College America response to proposed inclusion of Pell Grant recipient cohort to OMS

Dear Mr. Reeves:

Complete College America is pleased the U.S. Department of Education (ED) plans to measure the success of Pell recipients via IPEDS, however, the proposed ED approach lacks key components necessary to effectively measure Pell Grant student success.

ED's proposal adds burden without providing needed data, in that:

1. It does not align with existing disclosure requirements that require collecting graduation within 100%, 150%, and 200% time for all first-time, full-time students receiving Pell.
2. It mixes full-time and part-time students and first-time and transfer students, as well as credential types.

As such, the resulting data would yield results highly related to the type of student being enrolled, rather than the type of outcome they accomplish.

As holder of the largest national data set of Pell student graduation outcomes, Complete College America urges ED to make the following changes to your proposal:<sup>1</sup>

1. **Utilize existing disclosure requirements to add Pell cohort to the Graduation Rate Survey.**<sup>2</sup> Use the same format for including race/ethnicity breakouts. This approach is aligned with the industry standard for graduation rates and will ensure the data available in IPEDS meets the disclosure requirement, which eases institutional burden. The Graduation Rate Survey also separates credential types.
2. **Collect outcome data for part-time and transfer students.** Do this by either:
  - a. **Adding a part-time and transfer cohort to the Graduation Rate Survey**, broken out by all students and Pell students, or
  - b. **Disaggregating each Outcome Metric cohort by Pell**, using the existing Outcome Metrics survey and collecting data disaggregated by all four cohorts.
3. **Define Pell recipients as students who receive Pell at first enrollment ("Pell at entry"), not those who receive Pell at any point ("Pell ever").** This expedites data collection and provides consistency.

<sup>1</sup> Since 2011, Complete College America has annually collected Pell graduation rates for full-time, part-time and transfer students from more than 28 states and over 500 public institutions.

<sup>2</sup> The Higher Education Opportunity Act of 2008 requires disclosure of graduation rates for Pell students.

# COMPLETE COLLEGE AMERICA

To implement these recommendations, we also encourage IPEDS to consider the more comprehensive fix proposed by the Postsecondary Data Collaborative in December 2014.<sup>3</sup>

Collecting Pell student graduation data in IPEDS will provide invaluable information about low-income student performance and ease burden for institutions. While Complete College America has been pleased to demonstrate the feasibility of an annual collection of Pell grant graduation rates, the prospects for college completion reforms are more likely if the federal government accepts this responsibility. These data provide students, policymakers, institutions, and policy researchers with information on outcomes of low-income students and a way to identify where Pell investments are most effective.

Thank you for your consideration of these recommendations. Again, we applaud your leadership in proposing long overdue additions to IPEDS for the purpose of measuring the success of America's Pell grant recipients. The Pell grant is an extraordinarily important investment to ensure access to higher education. Let's make the most of this rare opportunity to encourage innovations necessary for more Pell student success.

If you have any questions, please do not hesitate to call or email Katie Zaback at [kzaback@completecollege.org](mailto:kzaback@completecollege.org) or (303) 349-4084.

Sincerely,

Stan Jones  
President  
Complete College America

CC: Kate Mullan

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<sup>3</sup> *Institute for Higher Education Policy* (December 2014), [http://www.ihep.org/sites/default/files/uploads/docs/press/postsecdata\\_comments\\_on\\_ipeds\\_outcome\\_measures\\_trp\\_dec\\_2014.pdf](http://www.ihep.org/sites/default/files/uploads/docs/press/postsecdata_comments_on_ipeds_outcome_measures_trp_dec_2014.pdf)

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## Appendix I: Direct Response to Department Supporting Statement

The U.S. Department of Education suggests in the register that:

“creating a cohort of Pell Grant recipients in the OM survey component is a better vehicle for data collection than creating a sub-Pell Grant cohort in Graduation Rates. Graduation Rates disaggregates reporting by race/ethnicity and gender and OM does not. The institutional burden, particularly at smaller institutions, would be greater if Pell Grant recipients had to be disaggregated by race/ethnicity and gender. Also, as several TRP (e.g., #s 24, 37, 40, and 45) have repeatedly argued, while such information would be desirable, small cell sizes become an issue due to potential disclosure of identifying information. Last, by collecting data on Pell Grant recipients through the OM survey component, non-Pell Grant recipient outcome data can also be calculated. The higher education community has frequently advocated for measures that allow for the comparison between Pell Grant recipients and non-Pell Grant recipients. Institutions would report the Pell Grant recipients across all of the OMs, and non-Pell Grant recipients could be calculated by subtraction.”

We disagree with the Department for the following reasons:

- Pell students would not have to be disaggregated in the Graduation Rate Survey. Rather, they could be added as a breakout if small n's and burden are a confirmed concern.
- The Outcomes Metrics Survey does not help institutions meet disclosure requirements. A key benefit of reporting Pell graduating rates to IPEDS is the ability to reduce burden required from disclosure.
- We see no reason non-Pell students can also be subtracted in the Graduation Rate Survey the same way they could be in the Outcomes Metrics Survey.

In addition, there is no justification for failing to disaggregate by attendance status (full-time or part-time) or postsecondary experience (first-time or non-first-time). All other data in the Outcomes Metric Survey is reported by the four enrollment categories: (full-time, first-time; part-time, first-time; full-time, non-first-time, part-time, non-first-time). Reporting data this way will seriously mask distinctions between groups of students and the effectiveness of institutions in meeting the needs of those students. See a comparison of data outcomes on the next page, which is based on the data already collected by Complete College America.

Furthermore, while the Higher Education Opportunity Act requires disclosure of graduation rates for Pell students, there is inadequate compliance.<sup>4</sup> What's more, as a disclosure requirement, these data cannot be efficiently accessed and compared. We need to know which institutions are best meeting the needs of Pell students—analysis best facilitated by efficient data collection in IPEDS.

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<sup>4</sup> Carey, K. & Kelly, A.P. (November 2011), *The truth behind higher education disclosure laws*, *American Enterprise Institute*, retrieved from [http://www.aei.org/wp-content/uploads/2011/11/truthhighereddisclosurelaws\\_185621335060.pdf](http://www.aei.org/wp-content/uploads/2011/11/truthhighereddisclosurelaws_185621335060.pdf)

# COMPLETE COLLEGE AMERICA

## How Institutional Ability to Serve Different Types of Students would be Hidden in the Current Methodology

	Current proposal would yield these results for 4-Year Institutions:	Breaking these out would yield the follow results for 4-Year institutions:			
	All Students	On Time Graduation Rates			
		Full Time	Part Time	Transfer	
Institution 1	20%	13%	0%	40%	
Institution 2	7%	<4%	0%	27%	
Institution 3	8%	<5%	0%	29%	
Institution 4	7%	4%	0%	17%	
Institution 5	8%	4%	0%	17%	
Institution 6	5%	<2%	0%	17%	
Institution 7	11%	3%	0%	27%	
Institution 8	8%	5%	0%	14%	
Institution 9	4%	<3%	0%	16%	
Institution 10	14%	10%	0%	30%	
Institution 11	28%	26%		37%	
Institution 12	14%	8%	14%	23%	
Institution 13	38%	36%		53%	
Institution 14	34%	31%		49%	

	% of Total Entering Students		
	Full-Time	Part-Time	Transfer
Institution 1	73%	1%	27%
Institution 2	59%	15%	26%
Institution 3	60%	12%	28%
Institution 4	56%	12%	32%
Institution 5	62%	5%	33%
Institution 6	58%	12%	30%
Institution 7	58%	6%	36%
Institution 8	57%	5%	38%
Institution 9	69%	8%	23%
Institution 10	72%	4%	24%
Institution 11	81%	0%	19%
Institution 12	58%	5%	37%
Institution 13	86%	0%	14%
Institution 14	82%	0%	18%

### Example Findings:

- Institution 1 & 11 have different outcomes overall in the current proposal but breakout data shows they have similar outcomes for transfer students, their differences are due to full-time students.
- Even though institution 12 has lower graduation rates overall, they are getting the best results with part-time students.

Comment related to removing Pell OM Cohort (Comment number 54)

Document: ED-2016-ICCD-0020-0054

Name: Kent Phillippe



April 18, 2016

Richard Reeves  
IPEDS Program Director  
National Center for Education Statistics  
Potomac Center Plaza  
550 12th Street SW, Room 4134  
Washington, DC 20202

Re: Docket No.: ED-2016-ICCD-0020

Dear Mr. Reeves:

This letter is submitted on behalf of the American Association of Community Colleges (AACC) in response to the Request for Comments posted in the Federal Register regarding the authorization to continue the Integrated Postsecondary Education Data System (IPEDS) data collection for 2016–2019. We commend the National Center for Education Statistics (NCES) for routinely soliciting input from the higher education community on many proposed policies.

AACC represents the nation's more than 1,100 community colleges and recognizes the value of annual IPEDS data collections. AACC is acutely sensitive to the institutional burden the surveys represent, a burden that could be lessened.

We are grateful for the addition of the Outcomes Measures, which follow on the work of the Department's Committee on the Measures of Student Success. However, AACC does not support the proposed addition of new Pell Grant recipient completion rates to the Outcomes Measure Survey. Our reservations do not reflect a lack of interest in institutional data concerning Pell Grant recipients, but concerns the specific form of the proposed collection. More than 3 million community college students receive Pell Grants each year, and Beginning Postsecondary Students Longitudinal Study (BPS) data show that, on average, they graduate at higher rates than students who do not receive the grants. This is not true for most other sectors of higher education. Our reasons for opposing the Pell Grant collection as proposed are:

1. The Higher Education Act (HEA) is currently in the process of being reauthorized. While it is likely that this process will not be completed for a number of months, the evident Congressional interest in federal data collection and institutional transparency makes it prudent to wait until Congress has acted in this area. AACC has articulated a comprehensive set of recommendations designed to streamline data collections in the completion area while more accurately presenting the outcomes of community colleges. Congress and other parties are understandably interested in identifying the success of Pell Grant

recipients, but these data should be integrated into what we hope are improved data collections taking place under a revised HEA. This includes a six-year community college graduation rate, with transfers out included in the rate. These proposals are grounded in AACC's Voluntary Framework of Accountability, which has broad acceptance throughout the community college universe, and which is also integrated into the Student Achievement Measure (SAM) framework.

2. Under the HEA, colleges are currently required to disclose graduation rates by Pell Grant status for their students. The new proposed measure does not align with these required disclosures, which are restricted to first-time, full-time students, and only for students who receive a Pell Grant in their first term. Collecting outcomes of Pell Grant recipients using a different methodology will produce different results that will cause confusion rather than present helpful additional information on the outcomes of Pell Grant recipients. Again, Congress should act to set definitive policies that more efficiently and effectively integrate the required disclosures into the institutional reporting requirements done via IPEDS.
3. The data will not be disaggregated by attendance status (full-time or part-time) or postsecondary experience (first-time or non-first-time). All students who begin at a college are included in the cohort. Not differentiating outcomes along these important dimensions, and instead combining all four into a single Pell Grant recipient cohort, drastically limits the value of the data collected for students who received a Pell Grant at any time during their enrollment period. In fact, it obscures as much as it reveals.

For these reasons, AACC strongly encourages NCES to remove the Pell Grant cohort from the Outcomes Measures in the 2016-2019 or future data collections of IPEDS. We are hopeful that numerous completion-related reporting requirements will be simplified in the coming months.

Thank you for your attention to these views. If you have any questions, please contact Kent Phillippe, [kphillippe@aacc.nche.edu](mailto:kphillippe@aacc.nche.edu), or David Baime, [dbaime@aacc.nche.edu](mailto:dbaime@aacc.nche.edu).

Sincerely,

Walter G. Bumphus  
President and CEO

**Comment related to disaggregating OM cohort by Pell (Comment number 61)**

**Document:** ED-2016-ICCD-0020-0061

**Name:** Anonymous

April 18, 2016

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

Re: Docket ID ED-2016-ICCD-0020

On behalf of the Association of Community College Trustees (ACCT), I am writing to offer comments on the Department of Education's Notice of Proposed Rulemaking published on February 18, 2016 concerning new data elements in the Integrated Postsecondary Education Data System (IPEDS) data collection.

ACCT is a non-profit educational organization of governing boards, representing more than 6,500 elected and appointed trustees who govern over 1,100 community, technical, and junior colleges in the United States and beyond. Forty five percent of all undergraduate students are enrolled in community colleges, more than in any other sector.<sup>1</sup> In 2011, 64 percent of our students enrolled part-time, 32 percent worked full-time while enrolled in school, and 18 percent were single with dependents.<sup>2</sup> These factors, among others, are obstacles that our students face to completion. While our colleges attempt to provide the best services and programs possible to support these students, the reality is that many community college students will struggle to complete a credential on time, if at all.

We believe that accurate data are a key to better understanding how community colleges can better serve their students. While we applaud the Department's addition of a Pell grant-receiving cohort to the annual IPEDS data collection, we are concerned that the aggregation of the Outcomes Measures cohorts (first-time full-time, first-time part-time, non-first-time full-time and non-first-time part-time) will mask the graduation rates of this important cohort. By nature of their enrollment, full-time students complete at faster rates than do part-time students, which lead to higher graduation rates for that group, especially in the short-term (e.g. 150 percent of normal time). This presents a problem when full-time and part-time students are combined into one reporting cohort. Because most community college students enroll part-

<sup>1</sup> American Association of Community Colleges (2016). Community college fast facts. Retrieved from <http://www.aacc.nche.edu/AboutCC/Pages/fastfactsfactsheet.aspx>.

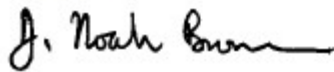
<sup>2</sup> National Center for Education Statistics, U.S. Department of Education (2015). Demographic and enrollment characteristics of nontraditional undergraduates: 2011-12. Retrieved from <http://nces.ed.gov/pubs2015/2015025.pdf>.

time, overall Pell grant recipient graduation rates will be skewed lower for community colleges, due only to students' need to balance their education with the rest of their life obligations.

We recommend that the Pell Grant recipient Outcome Measures be reported for each of the Outcome Measures cohort groupings so as to provide comparability among institution types and between community colleges. These data will be more useful for institutions interested in improving outcomes of specific student groups and help students who are using these data to determine which institution will provide them with the best opportunity to succeed.

We look forward to working closely with the Department and NCES in this important matter. If you have any questions, please feel free to contact to contact me at [nbrown@acct.org](mailto:nbrown@acct.org) or (202) 775-4668.

Sincerely,



J. Noah Brown  
ACCT President and CEO

**Comment related to disaggregating OM cohort by Pell (Comment number 63)**

**Document:** ED-2016-ICCD-0020-0063

**Name:** Lindsay Ahlman



April 18, 2016

Kate Mullan  
Acting Director  
Information Collection Clearance Division  
U.S. Department of Education  
400 Maryland Ave, SW  
LBJ, Room 2E103, Washington, DC 20202  
(submitted electronically via regulations.gov)

Re: Docket ID ED-2016-ICCD-0020

Dear Ms. Mullan:

These comments are in response to the February 18, 2016 Federal Register notice soliciting input on proposed changes to the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS) data collection.<sup>1</sup> The Institute for College Access & Success (TICAS) works to make higher education more available and affordable for people of all backgrounds. Through nonpartisan research, analysis, and advocacy, we aim to improve the processes and public policies that can pave the way to successful educational outcomes for students and for society.

We applaud the Department of Education (the Department) for proposing to collect data on Pell Grant recipients' college outcomes in IPEDS, as TICAS and many other groups have recommended for years. Collecting and disseminating these data via IPEDS would provide students, policymakers, institutions, and policy researchers with critical information on how outcomes for low-income students vary across institutions, and how they compare with the outcomes of more well-resourced classmates. Having accessible and reliable completion data for Pell Grant recipients will also help students and families make informed choices about enrolling in institutions that serve all students well.

However, the proposal put forward by the Department is highly problematic, because it unnecessarily blurs distinctions between student groups and restricts the ability to make comparisons across colleges. To address this problem, the Postsecondary Data Collaborative offers several options that would provide more meaningful data than the current proposal. We support one of these options, to disaggregate each Outcome Measures (OM) cohort by Pell status using the existing OM survey, because we believe it offers the best balance between institutional burden resulting from increased reporting requirements and robust and useful measures of Pell student outcomes.

#### Concerns with the Proposed Approach to Collecting Pell Graduation Rates

Students entering schools as first-time full-time, first-time part-time, non-first-time full-time, and non-first-time part-time experience different enrollment and completion trajectories,<sup>2</sup> and providing a separate metric for each group is critical to producing fair and meaningful measures. Yet the Department's proposal would ask colleges to report on all of these students grouped together, counter to virtually every other student outcome measure. Grouping those students together severely limits one's

<sup>1</sup> U.S. Department of Education. February 18, 2016. *Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019*. Federal Register Notice, Docket ID: ED-2016-ICCD-0020. <https://www.gpo.gov/fdsys/pkg/FR-2016-02-18/pdf/2016-03338.pdf>.

<sup>2</sup> Chen, J., Chiang, Y., Dundar, A., Park, E., Shapiro, D., Torres, V., & Ziskin, M. November 2012. "Completing college: A national view of student attainment rates" (Signature report no. 4). *National Student Clearinghouse Research Center*. [https://nscresearchcenter.org/wp-content/uploads/NSC\\_Signature\\_Report\\_4.pdf](https://nscresearchcenter.org/wp-content/uploads/NSC_Signature_Report_4.pdf).

ability to draw conclusions about differences in graduation rates between different institutions and between Pell Grant recipients and non-Pell-Grant recipients. Furthermore, measures for an aggregated group will not be comparable to other cohorts typically used in higher education.

With a combined cohort, it will be impossible to tell whether differences in graduation rates reflect actual variations in outcomes, or whether the rates simply reflect differences in attendance patterns or enrollment intensity. The below table provides an example of how combining full- and part-time students can lead to a misleading representation of an institution's graduation rate. Compared to School B, School A has higher graduation rates for both full-time students (60% versus 58%) and part-time students (40% versus 36%). However, School B has a higher *overall* graduation rate for the full- and part-time students combined (53% versus 50%) due to having a larger share of full-time students.

	School A (50% full-time)			School B (80% full-time)		
	Completers within six years	Entering cohort	Graduation rate	Completers within six years	Entering cohort	Graduation rate
Full-time	60	100	60%	115	200	58%
Part-time	40	100	40%	18	50	36%
Combined	100	200	50%	133	250	53%

While these issues will limit the comparability of all schools' rates, they will result in particularly misleading rates for schools, like community colleges, which enroll large shares of part-time students who take longer to complete.

These same issues also make comparisons between Pell and non-Pell students difficult to interpret, because Pell recipients and non-recipients attend part-time and transfer at different rates.<sup>3</sup>

Furthermore, the combined cohort deviates from current practices in the field, and the measures for an aggregated group will not be comparable to other cohorts typically used in higher education. For example:

- a. *Complete College America (CCA)* collects Pell graduation rates for nine separate cohorts – certificate, associate, and bachelor's-seeking crossed with first-time full-time (FTFT), first-time part-time (FTPT), and transfers-in (full- and part-time combined).<sup>4</sup>
- b. *The Student Achievement Measure (SAM)* calculates student outcomes separately for FTFT and transfer full-time students in their bachelor's model. They also include optional

<sup>3</sup> First-time students who receive Pell Grants are more likely to enroll full-time and transfer than first-time students who don't receive Pell Grants. Seventy-five percent of first-time students in 2003-04 who received Pell Grants at some point before 2009 began as exclusively full-time, compared to 62% of students who never received Pell Grants. Additionally, 35% of first-time students in 2003-04 who received Pell Grants at some point before 2009 had transferred to a different institution during that six-year period, compared to 29% of students who never received Pell Grants. Calculations by TICAS on data from the U.S. Department of Education, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-Up (BPS:04-09).

<sup>4</sup> Complete College America. 2015. *Complete College America common college completion metrics technical guide* last updated April 23, 2015. <http://completecollege.org/wp-content/uploads/2014/11/2014-Metrics-Technical-Guide-Final-04022014.pdf>.

BA-seeking cohorts for FTPT and transfer-in part-time students.<sup>5</sup> While SAM does not currently disaggregate by Pell status, it does set a clear precedent of reporting outcomes separately for cohorts defined by attendance intensity and previous college experience. SAM will also be adding the capability for reporting Pell student outcomes as a sub-cohort to existing models in Fall 2016.<sup>6</sup>

- c. *Statutory requirements* for disclosures by colleges pertain to the graduation rate of certificate/degree-seeking full-time undergraduate students, and are required by law to be disaggregated by gender and race/ethnicity as well as by Pell receipt, receipt of subsidized Stafford loans but not Pell, and neither subsidized loans nor Pell.<sup>7</sup> Based on this disclosure requirement, The Education Trust's "The Pell Partnership" research calculates Pell graduation rates using a FTFT cohort.<sup>8</sup>

### Three Recommendations for Collecting Data on Pell Grant Recipient Outcomes

1. *Require colleges to report Pell recipient outcome measures with student cohorts disaggregated. We strongly recommend disaggregating the Pell graduation outcomes by the four established OM subgroups, rather than as a new aggregate cohort that combines all four subgroups.* This will correct the major shortcoming of the current proposal, and ensure measures of graduation outcomes for Pell students that can accurately inform students and their families, as well as researchers, advocates, and policymakers, about how well institutions serve low-income students.

We also recommend that BA-granting institutions be required to disaggregate the reported outcomes by BA-seeking and non-BA-seeking students. The OM section currently does not require colleges to report on outcomes disaggregated by award. As described in our prior comments,<sup>9</sup> combining all award levels makes it difficult to derive meaningful comparisons between colleges with different mixes of awards by level (e.g., two colleges with a 75% completion rate where one awards primarily bachelor's degrees and one awards primarily short-term certificates) because completion rates for shorter-term programs tend to be higher simply due to the smaller number of credits required. Furthermore, four-year colleges already break out BA-seekers and non-BA-seekers in the GRS component of IPEDS, so these institutions already have experience created these cohorts, minimizing the additional burden of reporting this level of detail.

2. *Consistent with the current proposal, include all students who ever received Pell over the course of the measurement period.* Pell Grant recipients can be identified using more or less inclusive definitions. A Pell cohort can be defined most narrowly as students who receive the grant during their first year enrolled ("Pell-at entry"), or most broadly as students who ever receive the grant during the entire measurement period ("Pell-ever"). We support the Department's proposal to use a "Pell-ever" cohort, which ensures that outcome measures reported are inclusive of all Pell

<sup>5</sup> Student Achievement Measure. 2014. *Methodology for calculating the bachelor's degree-seeking cohort metric*, updated August 20, 2014. <http://bit.ly/1TXPx5r>.

<sup>6</sup> Hinds, T. & Keller, C., email communication to IHEP from Association of Public & Land-grant Universities (APLU), March 29, 2016.

<sup>7</sup> 20 USC 1092(a)(1). <http://1.usa.gov/1QdTGLx>.

<sup>8</sup> Nichols, A. 2015. *The Pell Partnership: Ensuring a Shared Responsibility for Low-Income Student Success*. <https://edtrust.org/resource/pellgradrates/>.

<sup>9</sup> TICAS. 2014. *Comments on TRP45 Outcomes Measures*. [http://ticas.org/sites/default/files/pub\\_files/TICAS\\_comments\\_on\\_TRP45\\_Outcomes\\_Measures.pdf](http://ticas.org/sites/default/files/pub_files/TICAS_comments_on_TRP45_Outcomes_Measures.pdf).

students. Due to issues such as failure to file the FAFSA each year or being deemed temporarily ineligible under Satisfactory Academic Progress rules, some students may receive Pell in some years but not others, despite being low income during the entire eight-year period covered by OM. Other students may be low income for part of the measurement period but not all of it. Using a Pell-ever cohort ensures that all such students are included, making it a more robust proxy of low-income status than a Pell-at-entry cohort. Other groups engaged in voluntary reporting initiatives also recognize the inclusivity of a Pell-ever cohort.<sup>10</sup>

Based on our analysis, if the Department were to define Pell students as only those who received the grant in their first year, about a quarter of Pell recipients would be excluded from the Pell cohort. Exclusions of Pell students would be concentrated at two-year institutions and among students attending less than full-time, who are less likely to receive Pell in their first year.<sup>11</sup> The Postsecondary Data Collaborative also identified a very similar share of Pell Grant recipients who would be excluded using a Pell-at-entry cohort.

In addition to its inclusiveness, a Pell-ever cohort is more consistent with other measures; for example, the Voluntary Framework for Accountability defines Pell recipients using a Pell-ever cohort.<sup>12</sup>

3. *Consistent with the current proposal, collect outcomes on more than just first-time full-time students.* The Department's proposal to collect these data as part of the Outcome Measures (OM) survey, as opposed to the Graduation Rate Survey (GRS) is appropriate. Including non-first-time and non-full-time students in the Pell cohort, as the OM survey allows but GRS does not, will ensure that these nationally collected data cover all undergraduates, and is in line with shifts in the higher education community generally towards data collection that better encompasses the diversity of students' paths and experiences. Using an FTFT cohort would exclude 42% of entering students who receive Pell Grants. At community colleges, almost half (48%) of entering Pell Grant recipients would be excluded from a FTFT cohort.<sup>13</sup>

Finally, we wish to note our concern that the Federal Register notice suggests requiring these new data as a means "to assess the effectiveness of this large federal investment to undergraduate students."<sup>14</sup> The Pell Grant program is our nation's most valuable investment in higher education, making college

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<sup>10</sup> The Education Trust. May 2012. *Replenishing Opportunity in America: The 2012 midterm report of public higher education systems in the Access to Success initiative (technical appendix)*. <http://bit.ly/1TXQ7QG>.

<sup>11</sup> Overall, almost a quarter (23%) of Pell Grant recipients do not receive a Pell Grant during their first year of college. Among Pell Grant recipients attending two-year institutions, 29% do not receive their first Pell Grant until after their first year. Additionally, Pell Grant recipients who start off attending college exclusively part-time are less likely to receive a Pell Grant during their first year than those starting college exclusively full-time (57% and 81%, respectively). Calculations by TICAS on data from the U.S. Department of Education, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-up (BPS:04/09). Figures reflect undergraduate students enrolling in college for the first time in 2003-04 who received Pell Grants at some point during the six years after enrolling. Attendance intensity and institution type reflect students' attendance during their first year.

<sup>12</sup> American Association of Community Colleges. November 2015. *Voluntary Framework of Accountability metrics manual version 4.0*. <http://vfa.aacc.nche.edu/Documents/VFAMetricsManual.pdf>.

<sup>13</sup> Calculations by TICAS on fall enrollment and student financial aid data for 2013-14 from the U.S. Department of Education, Integrated Postsecondary Education Data System (IPEDS). Note that students at community colleges have the largest number of students who would be excluded from a FTFT cohort, compared to other institution types.

<sup>14</sup> Supporting statement part A, 60-day Federal Register notice (February 19, 2016) for Docket ED-2016-ICCD-0020: Agency information collection activities; Comment request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019, 81 Fed. Reg. 8181 (February 18, 2016).

possible for nearly eight million Americans each year,<sup>15</sup> and many rigorous studies on the effectiveness of Pell Grants and other need-based grant aid have found them to facilitate students' enrollment, persistence, and completion.<sup>16</sup> It would be a mistake to interpret Pell Grant recipient graduation rates as evidence to the contrary, particularly given the substantial decline in the grant's purchasing power over the last 40 years.<sup>17</sup>

Thank you for your thoughtful consideration of our feedback and recommendations. If you have any questions, please feel free to contact me at [lahlman@ticas.org](mailto:lahlman@ticas.org) or 202-854-0232.

Sincerely,



Lindsay Ahlman  
Senior Policy Analyst  
The Institute for College Access & Success (TICAS)

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<sup>15</sup> U.S. Department of Education. 2016. *Fiscal Year 2017 Budget Request: Student Financial Assistance*. <http://1.usa.gov/1LxtZ7Y>. Page O-24.

<sup>16</sup> For more information, see TICAS. 2016. "Pell Grants Help Keep College Affordable for Millions of Americans." [http://ticas.org/sites/default/files/pub\\_files/overall\\_pell\\_one-pager.pdf](http://ticas.org/sites/default/files/pub_files/overall_pell_one-pager.pdf).

<sup>17</sup> The \$5,815 maximum Pell Grant in 2016-17 is expected to cover less than 30 percent of the cost of public four-year college. College costs are defined here as average total in-state tuition, fees, room, and board. Projected college costs for 2016-17 were estimated by using the average annual increase in costs over the most recent five years. Calculations by TICAS using College Board, 2015, *Trends in College Pricing 2015*, Table 2, <http://bit.ly/1Pyy2sj>, and U.S. Department of Education, Pell Grant payment and disbursement schedules <http://ifap.ed.gov/dpclatters/GEN1601.html>.

## Response

Dear Ms. Keller (APLU), Ms. Haycock (Education Trust), Ms. Voight (Postsec Data Collaborative), Ms. Flores (Center for American Progress), Mr. Jones and Ms. Zaback (Complete College America), Mr. Bumphus (American Association of Community Colleges), Mr. Brown (Association of Community College Trustees), and Ms. Ahlman (The Institute for College Access and Success),

Thank you for your feedback responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. The National Center for Education Statistics (NCES) appreciates your interest in IPEDS and the very detailed and compelling set of recommendations sent by you on behalf of your organizations. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comments.

NCES recognizes these commenters are among the expert IPEDS data users, many of whom have been invited to participate and comment in the IPEDS Technical Review Panels (TRP) that serve as the source for making changes to the IPEDS data collection. Each organization submitted similar recommendations related to the OM survey. As such, NCES has organized one response grouping together the recommendations.

Based on the comments from this Federal Register Notice, NCES plans to hold a TRP in August of 2016 to allow a representative group of higher education institutions and data users to review a new OM survey component with Pell Grant cohorts for each of the four cohorts and possibly to be completed by all institutions. At this time NCES believes that the expansion of the OM survey component to include these cohorts would benefit from broader industry input to consider survey form layout, instructions, and consistency with other parts of IPEDS. NCES has been in contact with OMB and are in agreement that a subsequent IPEDS package will be submitted in the fall of 2016 to address the input that will be made during the August 2016 TRP and in response to its report.

Many commenters proposed that the Pell Grant cohort should be added to the Graduation Rates (GR) survey. NCES appreciates your support to begin collecting GR data on Pell Grant recipients and will propose the collection of the 150% graduation rate in the GR survey. As cited in several of your comments there is already legislative language that institutions should be preparing these data for the public and thus, collection within IPEDS should not pose a significant burden but will allow for a singular access to the GR 150% graduation rate for a Pell Grant cohort. Updates to the GR survey will be present in the 30-day materials, to be published in June 2016, and NCES plans to interact with the postsecondary community to create instructions for this collection during the summer of 2016 in order to allow for the collection to begin in the 2016-17 collection cycle.

We also recognize your comment to change the directions when identifying the Pell Grant recipients at point of cohort entry instead of throughout the measurement period of 8 years. However, collecting at point of entry means the data metric would be undercounting the number of Pell recipients during the 8 year measurement. In other words, NCES would not account for the students who did not receive a Pell Grant their first year, but were recipients in their successive years. Some commenters have cited that this would result in an undercount of somewhere between 11% (APLU) and 25% (TICAS). As an important federal program that supports the postsecondary access of low-income Americans, we cannot undercount any of these students. To ensure there is no confusion between the full-time Pell Grant disclosure graduation rates that must be disclosed by institutions, NCES will post in the Outcome Measures instructions that the collected data are not the Pell Grant disclosure rates, and further make clarification between the proposed GR 150% Pell Grant disclosure and OM Pell Grant completion rates at 6 years and 8 years. This will be further discussed in the August 2016 TRP, but will remain as defined in the OM survey for now.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

## Comments related to CoA and net price (Comment number 56)

**Document:** ED-2016-ICCD-0020-0056

**Name:** Michael Runiewicz



April 18, 2016

Ms. Kate Mullan  
Acting Director, Information Collection Clearance Division  
U.S. Department of Education  
400 Maryland Avenue SW., LBJ, Room 2E103  
Washington, DC 20202-4537

Dear Ms. Mullan:

Thank you for the opportunity to comment on the proposed revision of the Integrated Postsecondary Education Data System (IPEDS), published in the Federal Register on February 16, 2016, docket number ED-2016-ICCD-0020.

Washington University in St. Louis is a medium-sized, independent research university that values the function of IPEDS data collection as a tool to provide pertinent financial aid information to prospective students, higher education researchers, and the press. Due to the wide-ranging availability and use of IPEDS data, the data collection effort should be conducted in such a way that seeks to uniformly collect and disseminate information in a format most useful to all stakeholders. At this time of reconsideration of IPEDS data collection, there is an opportunity to improve the process to address the growing gap between financial aid practices, data collection, and the public consumption of this data.

### **Income Used in Net Price Data**

When a student initially considers a list of schools to consider, it is a value judgment the student makes with the input of their family, friends, media, and data from sources such as IPEDS. Therefore, it is of the utmost importance that the student has accurate information to make an informed decision. The net price data collected in IPEDS is widely used in this regard. These measures provide an average net price as well as an average for families in certain income ranges for students in groups 3 and 4. Due to differences in interpretations of the requirements and the statistics used to report this data, there are more accurate and effective ways to represent net price costs to students.

At this time, the methods used to determine the income range for a student vary greatly across institutions. The current description of how to determine income for a student instructs users to "use the income that was used by your financial aid office to determine the students' Expected Family Contribution (EFC)." At many institutions, there are multiple expected family contributions that are calculated. While the federal EFC, derived from federal methodology (FM), is used to award federal need-based components, a unique institutional methodology may also be used to calculate a separate EFC that determines the amount of institutional need-based assistance the student receives. For example, a school may allow business losses to reduce income and/or consider the income from a noncustodial household in their own calculations.

The at-a-glance view of net price that IPEDS provides is a valuable tool for quick comparisons. The trade-off between accuracy and speed can be seen in the different results of the NPC and an average obtained from IPEDS. Ideally, the results of one federally required measure of a student's net price should closely align with other federally reported measures on the same topic. Today, the difference between a student's estimated net price from their IPEDS family income range and the results of a can be drastically different. This is due, in part, to NPC guidelines that explicitly allow the use of either federal methodology or an institutional methodology to arrive at the student's net price. Additionally, the federally provide NPC template uses the median amount of scholarships and grants as opposed to average values used by IPEDS. As a measure of central tendency, the average is the most heavily influenced by the presence of statistical outliers and/or small sample sizes.

#### **Cost of Attendance (COA)**

Another item that would increase transparency would be to highlight the most pertinent COA elements that appear in the net price data. When comparing schools, the most important elements of COA are institutional charges (tuition, fees, room, and board). The non-institutional elements (miscellaneous, transportation, books, and supplies) are at the discretion of the school and can vary greatly. For example, when examining the 2016 U.S. News and World Report top 20 schools, the difference between the highest (UC Berkeley- \$5,554) and lowest (Johns Hopkins- \$2,223) reported non-institutional costs for the 2014-2015 academic year is \$3,331. This is a significant cost difference and ultimately is not one that would be incurred by the typical student. To a large extent any differences in non-institutional costs are determined by the choices of the student and have little to nothing to do with the school.

#### **Proposals**

In order to address the issues listed above, please consider the following proposals:

- Provide a clearer definition of income that prohibits or explicitly allows the use of methodologies other than FM to calculate income.
- Allow institutions to provide a median value for scholarships and grants to replace or be listed in addition to the average that is calculated in net price data.
- Include an "institutional net price" that includes tuition, fees, room, and board as costs. This measure would allow for easier comparisons of actual charges a student would have at a particular school. This would be meant to supplement the existing net price information. It would also remove some incentive for schools to minimize the amount of non-institutional costs reported in COA.

Thank you for this opportunity to make suggestions regarding IPEDS data collection. I hope they are useful to this current exercise or a future Technical Review Panel.

Best Regards,



Michael J. Runiewicz  
Director, Student Financial Services



## Response

Dear Mr. Runiewicz,

Thank you for your feedback posted April 19, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comments proposing to: (1) provide a clearer definition of income that prohibits or explicitly allows the use of methodologies other than FM to calculate income; (2) allow institutions to provide a median values for scholarships and grants to replace or be listed in addition to the average that is calculated in net price data; and (3) include an "institutional net price" that included only tuition, fees, room, and board as costs.

In response to your recommendation that NCES should clearly define the method of how institutions determines Expected Family Contribution (EFC), NCES does ask that a minimal set of input elements (income, number in family, and dependency status or factors that estimate dependency status) be included in an institution's EFC. However, NCES plans to continue to allow institutions to use either Federal Methodology or Institutional Methodology to approximate the student's EFC because we believe that this provides flexibility in allowing institutions to ask users to provide whatever information is necessary for the institution to be able to approximate an accurate EFC for their institution. This guidance was provided to NCES through Technical Review Panels on cost of attendance and net price calculations for institutions.

In response to your suggestion to collect median values for scholarships and grants to replace or in addition to the average that is calculated in net price, NCES only collects net price based on average because it is mandated by law in Higher Education Act (HEA). HEA states, "The term 'net price' means the average yearly price actually charged to first-time, full-time undergraduate students receiving student aid at an institution of higher education after deducting such aid, which shall be determined by calculating the difference between – (A) the institution's cost of attendance for the year for which the determination is made; and (B) the quotient of – (i) the total amount of need-based grant aid and merit-based grant aid, from Federal, State, and institutional sources, provided to such students enrolled in the institution for such year; and (ii) the total number of such students receiving such need-based grant aid or merit-based grant aid for such year. In order not to provide additional reporting burden on the institutions, we do not require the collection of median values as well.

In response to your recommendation to include an "institutional net price" that includes only tuition, fees, room, and board as cost, NCES does not only include these categories in the calculation of cost of attendance due to guidance provided in HEA and recommendations given in Technical Review Panels (TRPs) for IPEDS. HEA states, The term 'cost of attendance' means the average annual cost of tuition and fees, room and board, books, supplies, and transportation for an institution of higher education for a first-time, full-time undergraduate student enrolled in the institution. The calculation of COA expanded to also include other expenses (personal expenses, transportation, etc.) in TRP #26 "Requirements of Higher Education Opportunity Act: Multi-Year Tuition Calculator and Net Price Calculator Template," which allows institutions to accurately calculate their COA based on additional factors that might influence costs. We believe that the current instructions for reporting cost of attendance and net price reflect what is required by law in HEA and the guidance given in TRPs and should provide for accurate and quality data being reported. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

Comments related to changes to Finance (Comment numbers 57, 64)

Document: ED-2016-ICCD-0020-0057

Name: Susan Menditto



National Association of College and University Business Officers  
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April 18, 2016

Department of Education Notice  
Integrated Postsecondary Education Data System 2016-2019  
Docket ID No.: ED-2016-ICCD-0020

To Whom It May Concern:

I am writing on behalf of the National Association of College and University Business Officers (NACUBO). Thank you for the opportunity to comment on the "Integrated Postsecondary Education Data System (IPEDS) 2015-2016, A Revision of Existing Information Collection." NACUBO is specifically commenting on revising suggested changes to the IPEDS Finance Survey.

Natural and Functional Expense Reporting

NACUBO applauds the proposal to streamline expense reporting. The current requirement to cross tabulate natural with functional expenses and allocate the operation and maintenance of plant, depreciation, and interest expense categories within the cross tabulation is burdensome and confusing.

NACUBO supports the proposed method of separately collecting functional and natural expenses. We approve of collecting only key natural expenses (salaries, benefits, depreciation and interest). Along those lines, we would prefer that the survey only collect significant functional expense categories as follows:

- Education and General expenses (E&G)
- Sponsored research
- Auxiliaries
- Hospital (medical) services
- Independent operations

We recognize that users of longitudinal data would miss the E&G expense details of instruction, academic support, student services, public service, institutional support, scholarships, etc. However, in practice, there is enough judgment applied when allocating costs within the detailed categories to render them insufficient for comparison.

Alternatively, if the details must be collected (as proposed), we ask that IPEDS emphasize:

1. The importance of E&G totals for each institution because the complexity of educational costs is best represented by aggregating multifaceted expense details that support the full educational mission.
2. A disclaimer about comparability of detailed functional categories among institutions.

Further, since NACUBO maintains the functional chart of account definitions within its Financial Accounting and Reporting Manual, we ask that a complete set of updated definitions be provided annually with Finance Survey instructions. NACUBO can annually provide an updated link to the functional definitions.

#### Scholarships and Discounts

NACUBO supports increasing comparability for sources of student financial aid across all institutions, especially given different accounting and recognition criteria for Pell Grants between the Governmental Accounting Standards Board (GASB) and the Financial Accounting Standards Board (FASB). When gathering the source components of an institution's tuition discount, NACUBO recommends that survey instructions clearly explain the following fundamental difference between recognition of Pell Grants under GASB and FASB:

For Pell Grants, only public institutions should report an amount as a discount source (because, according to GASB, Pell Grants are recognized as revenue and also a discount—or scholarship expense—when the grant is applied as payment on the student's account or disbursed to the student). Alternatively, independent not-for-profit (NFP) institutions should *not* have Pell Grants as a discount or scholarship-funding source. NFP institutions follow FASB standards, and because Pell Grants are a payment on a student's account, FASB would not consider the student's grant as a source of institutional revenue. Rather, Pell Grants are considered "agency" transactions and pass directly to the student (typically as a form of payment for tuition or fees on the student's account).

In conclusion, I'd like to thank you for your consideration and time in reviewing our comments.

Sincerely,

Susan M. Menditto  
Director, Accounting Policy  
National Association of College and University Business Officers

**Document:** ED-2016-ICCD-0020-0064

**Name:** Susan Menditto

This letter is an addendum that augments NACUBO's comments submitted during business hours on April 18, 2016 and specifically addresses proposed "scholarship and discount" information changes.



### Addendum to Originally Submitted Comments

April 18, 2016

Department of Education Notice  
Integrated Postsecondary Education Data System 2016-2019  
Docket ID No.: ED-2016-ICCD-0020

To Whom It May Concern:

I am writing on behalf of the National Association of College and University Business Officers (NACUBO). This letter is an addendum that augments NACUBO's comments submitted during business hours on April 18, 2016 and specifically addresses proposed "scholarship and discount" information changes.

As previously noted, given different accounting and recognition criteria for Pell Grants between the Governmental Accounting Standards Board (GASB) and the Financial Accounting Standards Board (FASB), NACUBO supports increasing comparability for sources of student financial aid across all institutions. However, it has subsequently come to NACUBO's attention that specifically mapping sources of institutional aid (known as the discount) will be problematic for some institutions because software systems used in higher education do not provide a method—through operational process or reporting—for specifically identifying the source of the discount. NACUBO does not know how pervasive this issue is, but would be willing to work with the Department of Education to shed some light on its significance.

Based on NACUBO's discovery, we hope that ED might consider a transition period—to allow software providers to make necessary updates—and institutions to train staff on new processes. In the interim, perhaps an additional question(s) can be added to the current Part E (GASB) / Part C (FASB), "Scholarships and Fellowships," which allows institutions to indicate if Pell Grants are treated as:

- Pass-through aid
- or
- Institutional revenue (and therefore contained in the discount total)

In conclusion, I'd like to thank you for your consideration and time in reviewing these additional comments.

Sincerely,

Susan M. Menditto  
Director, Accounting Policy  
National Association of College and University Business Officers

### Response

Dear Ms. Menditto,

Thank you for your feedback dated April 18, 2016, on behalf of the National Association of College and University Business Officers (NACUBO), 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. We are grateful for this process and your comment.

NCES appreciates NACUBO's recommendations and support for the requested changes to the Finance survey. However, we will decline to collect functional expense for just the categories listed in the comment. IPEDS Finance data is accessed by a variety of data users; including the U.S. Census Bureau, the Bureau of Economic Analysis, other departments within the U.S. Department of Education, the Delta Cost Project, and various accrediting bodies for analysis. Several publications, including the annually published *Digest of Education Statistics*, also use the Finance data for long term trends in postsecondary expenditures. As such, we cannot discontinue the collection of the functional expense by the current categories and begin collection by a new set of categories.

We recognize that the allocation of expense is subjective and will follow the recommendation to emphasize this point to data users wishing to compare functional expenses across institutions. Similarly, NCES already has a tip sheet that explains in detail the fundamental difference between the recognition of Pell Grants under FASB and GASB standards ([http://nces.ed.gov/ipeds/Section/fct\\_ipeds\\_finance\\_03072007\\_3](http://nces.ed.gov/ipeds/Section/fct_ipeds_finance_03072007_3)), but we will make an effort to emphasize this point in the instructions and FAQs. In response to the recommendation to update functional expense category definitions annually using the NACUBO Financial and Accounting Manual, this is not feasible because changes to the survey require approval from the Office of Management and Budget (OMB). Neither NCES nor OMB will have the resources sufficient to complete an approval process annually.

NCES has worked with NACUBO in the past to ensure that collected fields will not place too much additional burden on institutions and the industry and will continue to work with NACUBO to determine whether addition of the new fields collecting sources of discounts will be problematic for data reporters. If current software systems for a substantial number of institutions do not support reporting of the discount sources, NCES will consider removing the additional requested fields. Again, we thank you for the feedback and look forward to working with your organization.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

#### **Comments related to emphasizing E12 over EF (Comment numbers 58, 65)**

**Document:** ED-2016-ICCD-0020-0058

**Name:** Dennis Devery

The Division could enhance the quality, utility and clarity of the information to be collected if it eliminated or adjusted the Fall Enrollment data collection.

Currently fall enrollment data is a snap shot of enrollments, usually on a specific date 15 October, that is then reported in multiple government and non-governmental arenas.

The problem is that these enrollment figures are a fraction of the actual total enrollments for many colleges and universities across the nation. Non-Traditional students now make up a majority of college and university enrollments and these students and their enrollment timelines do not conform to the traditional Fall and Spring enrollment timelines of the past. Because this data comes early in the year and is highlighted in numerous government and non-governmental reports it distorts the actual college and university enrollment situation. If the intent is to provide enrollment data that is reflective of college and university enrollments today then we should eliminate Fall enrollment date collection and just use total enrollment data or highlight total (12 month enrollment data) as the primary enrollment data and use Fall enrollment data as secondary data.

**Document:** ED-2016-ICCD-0020-0065

**Name:** Ann Marie Senior

1) Is there still a need for this component since there is also a 12 Month Enrollment component of IPEDS?

The Fall Enrollment file collects data at a single point in time and does not accurately capture the full year enrollment counts – this is especially true for colleges and universities serving nontraditional students. Although the Fall Enrollment counts are not for the complete academic year, they are nonetheless used in high profile reports that are used to disseminate college enrollment counts to the public (e.g. College Navigator Website, IPEDS Data Center, IPEDS Data Feedback Reports, College Affordability and Transparency Center Website). This gives the impression that they reflect the full year counts when in fact they are just representing the partial year counts.

(4) How might the Department enhance the quality, utility, and clarity of the information to be collected?

Suggestion: The 12 month file provides a truer picture of the enrollment counts of each institution and is the better way to make comparisons between institutions. Since the difference between the Fall enrollment counts and the 12 month enrollment counts varies greatly between institutions, would it be possible to only have one enrollment component that reflects the full year enrollment counts instead of the partial year? Or would it be possible that the Fall Enrollment counts not be used for public reports since they only represent a partial count of the final year end counts? The variables collected on the Fall Enrollment report are appropriate, however, the narrow time frame for snapshotting the counts does not seem to be as necessary or useful as it was when we did not have the 12 month enrollment file.

### Response

Dear Mr. Devery and Ms. Senior,

Thank you for your feedback dated April 18 and 19, 2016, 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. We are grateful for this process and your comment.

NCES recognizes that the student count reported in the Fall Enrollment survey may not capture the “nontraditional” students that enroll during periods of times not allotted to the fall census window. This is why we created the 12-month Enrollment survey – to capture students that enroll during other time periods of the year. However, the 12-month enrollment count is not without its weaknesses. Students who transfer during the 12-month time frame to different institutions will be counted multiple times. The Fall Enrollment count does not experience this same issue because it is a snapshot of enrollment at one particular time. As such, NCES relies on both enrollment surveys to give an accurate picture of student enrollment at postsecondary institutions. The Fall Enrollment count would better reflect enrollment at the more traditional institutions where the majority of students enroll by the fall census date. For institutions that enroll more nontraditional students, the 12-month enrollment count would better reflect their population.

While many IPEDS publications use the Fall Enrollment count, NCES has always tried to educate the higher education community and the public on the differences between the two enrollment surveys. Fall Enrollment counts are used in College Navigator because the Higher Education Act, as amended, mandated that the number of degree- or certificate-seeking undergraduates enrolled who have transferred to another institution is displayed, and this information is collected in the Fall Enrollment survey. IPEDS Data Feedback Reports are customizable while both enrollment surveys’ data are displayed in the Data Center. However, we recognize that more can be done to inform the public, so NCES is working on a brochure that will explain both the surveys and their differences. This brochure is expected to be published by the end of 2016.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

## Comment related to veteran's benefits and definitions and instruction clarifications on SFA (Comment number 62)

**Document:** ED-2016-ICCD-0020-0062

**Name:** Georgia Whiddon

Regarding (5) how might the Department minimize the burden of this collection on the respondents:

Secure cooperation with Department of Defense and Veteran's Affairs to assist with the collection of veterans educational benefit information for Section 2: Military Servicemembers and Veteran's Benefits.

Regarding (4) how might the Department enhance the quality, utility, and clarity of the information to be collected:

Consider moving Yellow Ribbon matching fund data into Section 2: Military Servicemembers and Veteran's Benefits. At least clarify the instructions regarding the reporting of the amount of Yellow Ribbon funds matched by the institution. It is baffling that Yellow Ribbon funding (amounts funded either directly from the VA and/or matched by the institution) are prohibited from being recognized and reported as Expected Financial Assistance (EFA), and yet IPEDS is asking for this level of data assistance in what essentially are EFA sections.

Divide Group 1 into full-time and part-time. There may be significant differences in costs between full-time and part-time populations, and the current lack of identifying this distinction may lead to flawed conclusions. Additionally, allow undergraduate populations to be sub-divided into sub-groups based on significant differences in cost within an institution, which will provide researchers with the opportunities to evaluate meaningful data and reach relevant conclusions.

Clarify definitions used throughout IPEDS instructions to assure equitable and comparable reporting and also to be sure that researchers are likewise fully informed of the definitions and that they are able to understand the differences in definitions. For example, what does it mean for a student to be "awarded" a loan? Does this mean that the student was offered the loan? Does it mean that they accepted the loan? Does it mean that they received a loan disbursement? Students may be offered a loan and accept a loan, and yet if the student fails to complete the required steps, may never receive a disbursement of a loan. If it is important to recognize these distinctions, then clarification is needed.

Finally, it seems additional data which could prove useful in research and for policy decisions may be just too difficult to obtain, at least via IPEDS. For example, when collecting student debt data, it would be useful to identify the portion of debt being used towards non-tuition/fee costs (such as living expenses) versus tuition/fee costs so that researchers may understand why students borrow. It seems this would help not only researchers, but also the public in understanding the reasons and use of federal loan funds borrowed. In the current IPEDS methodology it is impossible to address such queries. Reporting this distinction of loan use may prove daunting for institutions, but if this is viewed as pertinent information that would be of value, then efforts for such data collection should be explored. Similarly, it may be useful to explore methods of collecting student debt data for students enrolled in programs where education delivery is for the most part via on-line.

### Response

Dear Ms. Whiddon,

Thank you for your feedback posted April 19, 2016 responding to a request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2016-19. 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. We are grateful for this process and your comment.

Thank you for submitting your comments proposing to: (1) secure cooperation with the Department of Defense and Veteran's Affairs to assist in the collection of data for SFA Section II; (2) move Yellow Ribbon matching fund data to SFA Section II; (3) divide Group 1 in SFA to full-time and part-time; (4) clarify definitions used in IPEDS (e.g. awarded); and (5) collect student debt data.

In response to your first recommendation to secure cooperation with the Department of Defense and Veteran's Affairs to assist in the collection of data for SFA Section II, NCES discussed this type of cooperation at Technical Review Panel (TRP) #36 "Collecting Data on Veterans." However, TRP #36 identified the following technical issues with the VA providing data to institutions for reporting to IEPDS:

- Inability of VA data to distinguish between undergraduate and graduate student beneficiaries;
- Reconciling institution facility codes used by VA and UnitID used by IPEDS;
- Lack of alignment in IPEDS and VA reporting periods, fluctuating variables like overpayments and underpayments that change over time, due to the transactional nature of the data system;
- Duplication of data for students who attend and receive benefits at more than one facility code; and
- Inability to validate data at the institution level other than Post-9/11GI Bill benefits.

Given the technical issues that were identified in the TRP discussion, the panel agreed that mapping VA data to IPEDS data for reporting to IPEDS is not feasible at this time.

In response to your second recommendation to move Yellow Ribbon matching fund data to SFA Section II, NCES does not plan to make this changes because Section II reporting is only for benefits provided directly through Post-9/11 GI Bill Benefits and Department of Defense Tuition Assistance Programs. The Yellow Ribbon program through the Post-9/11 GI Bill is an institutional aid matching program only for tuition and fees for students attending participating institutions. The institutional aid provided through the Post-9/11 GI Bill Yellow Ribbon matching program should not be reported in the Post-9/11 GI Bill's total dollar amount of benefits/assurances because the funding comes from the institution not directly from the benefit/assistance programs. The institution's matching funds from the Yellow Ribbon program should be reported under institutional aid in SFA section I as it aligns with the institutional data reported in this section. The reporting instructions for Yellow Ribbon matching fund data came from guidance provided during TRP #36.

In response to your third recommendation to divide Group 1 in SFA to full-time and part-time, NCES does not plan to make this change because the Higher Education Act (HEA), as amended, requires institutions to report financial aid data for multiple groups of students (including Group 1 – all new and continuing undergraduate students). Also, dividing Group 1 into only full-time and part-time students is not feasible because this categorization would exclude degree/certificate-seeking students, non-degree/certificate seeking students, and all other students, which is a reporting requirement.

In response to your fourth recommendation to clarify definitions used in IPEDS for SFA (e.g. awarded), NCES defines terminology through the SFA instructions, glossary, and FAQs of the SFA survey package. For example, SFA provides the following FAQ, "Question: What does 'aid awarded' mean? Answer: Institutions should report on grant or scholarship aid that has been awarded to students. This may be different from aid that was actually disbursed to students. For example, a student may be awarded grant or scholarship aid at the beginning of the academic year but then leave the institution before the entire amount is disbursed. In this case, you would report the original amount of grant or scholarship aid that was awarded, even though the entire amount was not actually disbursed to the student. For reporting loans to students, institutions should continue to report on loans that were awarded to and accepted by the student." However, NCES will review SFA instructions, glossary, and FAQ to ensure all terminology is clearly defined.

Finally, in response to your recommendation to collect student debt data, NCES does not collect this information because these data are collected through the Office of Federal Student Financial Aid. We believe that the current SFA data being collected and instructions for reporting should provide for accurate and quality SFA data from institutions. Thank you again for your feedback.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division



