

**Comments Received During the 60-day Public Comment Period  
and NCES Responses  
January 2017**

**Integrated Postsecondary Education Data System (IPEDS) 2017-20**

ED-2016-ICCD-0127

Comments on FR Doc # 2016-27426

**Comments related to OM (Comment number 1)**

**Document:** ED-2016-ICCD-0127-0005

**Name:** Anonymous Anonymous

**Date posted:** November 22, 2016

The proposed change to have academic reporters report on a full-year entering cohort similar to program reporters for the Outcomes Measure survey will create a substantial reporting burden, as noted in the supporting documentation on regulations.gov. This will be made even more burdensome by the addition of the need to create four Pell Grant sub-cohorts for the full-year period. These requirements are in stark contrast to current HEOA requirements. Institutions that have been following the current law will be unduly burdened. IPEDS should look to HEOA and align reporting requirements with current law.

On page 55944 of the Federal Register, Volume 74, No. 208, it clearly specifies that to comply with the requirements of HEOA for disaggregated completion or graduation rate information for students by the receipt or nonreceipt of Federal student aid, "students shall be considered to have received the aid in question only if they received such aid for the period specified in paragraph (a)(3) of this section." Paragraph (a)(3)(i) states the following: "An institution that offers a predominant number of its programs based on semesters, trimesters, or quarters must base its completion or graduation rate, retention rate, and, if applicable, transfer-out rate calculations, on the cohort of certificate or degree-seeking, first-time, full-time undergraduate students who enter the institution during the fall term of each year." Therefore, switching to a full-year reporting basis for IPEDS academic reporters goes against current related guidance in HEOA.

**Response**

Dear Anonymous,

Thank you for your feedback posted on November 17, 2016 responding to a 60-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2017-20. 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 purpose of the Outcome Measures (OM) survey component is to address the limitations of the Graduation Rates survey component. The collection of graduation rates is defined by statute (*Student Right to Know and Campus Security Act*) and restricted to data collection on first-time, full-time undergraduate students. The OM survey is not defined similarly and thus provides the opportunity to follow the original recommendations of the 2012 Committee on Measures of Student Success, which were to broaden the coverage of student graduation data to reflect a more diverse student population at two-year institutions and improve the collection of the overall student progression and completion data. With this purpose in mind, OM allows for a more complete collection on graduation rates by instructing academic reporters to report on a full year student cohort instead of a Fall census based cohort. This decision was greatly supported by the data users (i.e., Center for American Progress, Complete College America, EdTrust, IHEP, and TICAS) and prior this comment period, Association of Public and Land-Grant Universities. The proposed changes would allow for the inclusion of more students in Outcome Measures, in particular students that enroll in the Spring that have not been included in prior cohorts. NCES strongly considered the increased institutional burden and determined that the need to be accountable and transparent to the public outweighs the change in burden, particularly for Pell Grant recipients. In 2014-15 the federal government disbursed \$30.3 billion in Pell Grants to 8.4 million full- and part-time undergraduate students ([Federal Student Aid Data Center](#)). The Pell Grant program is a

large commitment of public dollars. It is imperative for the federal government to have comparable and comprehensive institutional data that reflects the outcomes of undergraduate and Pell-recipient populations.

We thank you for taking the time to provide comment.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief  
Administrative Data Division

### Comments related to OM (Comment number 2)

**Document:** ED-2016-ICCD-0127-0006

**Name:** Mary Heather Smith

**Date posted:** November 30, 2016

I have several concerns about the proposal to track spring admits in the Outcome Measures survey:

1. There are very few spring entrants at my institution and at similar institutions. Adding the spring cohort will add a disproportionate time burden in order to track only a handful of students.
2. Spring admits are generally different from the typical fall admit. Combining spring and fall admits will be misleading in many schools and not lead to any actionable information.
3. My institution, like some others, awards degrees only once per year, in the spring. A spring admit may have completed all requirements by the end of the sixth year, which would be a fall term, but won't actually graduate until spring, which would be after the 6-year window. Thus, the 6-year graduation rate for the spring admits would be misleading.

### Response

Dear Ms. Smith,

Thank you for your feedback posted on November 17, 2016 responding to a 60-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2017-20. 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 and I hope to address each concern.

We understand that for many institutions, the number of spring admits may be small and that this group of students may differ in many ways from students admitted in the fall. However, a primary purpose of the Outcome Measures (OM) survey is to address the limitations of the Graduation Rates survey component, which collects data on first-time, full-time (FTFT) undergraduate students, across degree-granting institutions. Academic reporting institutions are currently required to report a Fall census based cohort, leaving out students that were admitted outside of the Fall census. The limitations of defining a cohort as FTFT and fall census have been a great critique by the current and past Administrations, Congress, and data users. The OM survey component allows for a more complete collection and inclusive depiction of the overall student progression on an increasingly diverse undergraduate student population. To your last point about some spring admits that may not graduate within the 6-year completion rate, these students would be counted in the 8-year completion rate.

These proposed changes include students who do not take a traditional path to higher education, especially those who receive a Pell Grant award.

We thank you for taking the time to provide comment.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief

## Comments related to OM (Comment number 3)

**Document:** ED-2016-ICCD-0127-0007

**Submitter's Name:** Christine Keller

**Date posted:** January 17, 2017



January 17, 2017

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

Dear Ms. Mullan:

This letter is submitted on behalf of the Association of Public and Land-grant Universities (APLU) and the American Association of State Colleges and Universities (AASCU) in response to the November 9, 2016 announcement regarding the addition of Pell disaggregates to the Outcome Measures (OM) survey component of the Integrated Postsecondary Education Data System. Collectively, APLU and AASCU represent over 500 public, four-year colleges and universities enrolling nearly two-thirds of the nation's undergraduates.

We appreciate the Department's detailed consideration of technical recommendations submitted by the data policy community, including those from the [PostsecData Collaborative](#) and [APLU](#) on April 18, 2016, and the decision to convene Technical Review Panel #50 in August 2016 to discuss the proposed changes to IPEDS. In agreement with many of our colleagues within the PostsecData Collaborative, we are further encouraged by the revised proposal to include Pell recipient data in the IPEDS Graduation Rates (GR) survey component in 2016-17 to match the pre-existing disclosure requirement in the Higher Education Act and produce a measure that is comparable to other completion rates.

APLU and AASCU support the intent to capture information about the postsecondary students who are not accounted for within the traditional first-time, full-time student cohorts by the inclusion of Pell cohorts in OM. However, after consultation with data professionals on our member campuses, we do not support collecting Pell outcomes through a full-year cohort for academic reporters in OM without addressing the concerns outlined in the [Technical Review Panel #50 Report and Suggestions](#) (see pages 3-4). Those concerns include the heterogeneity of cohorts, enrollment status changes, lack of integration with other IPEDS surveys, institutional burden, and the introduction of multiple completion rates.

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

Thank you for the opportunity to comment and offer technical feedback. If you have any questions, please do not hesitate to contact Christine Keller at [ckeller@aplu.org](mailto:ckeller@aplu.org) or Tom Harnisch at [harnischt@aaascu.org](mailto:harnischt@aaascu.org).

Sincerely,

Christine M Keller, PhD  
Vice President, Research & Policy Analysis  
Association of Public and Land-grant Universities

Thomas L. Harnisch, EdD  
Director of State Relations and Policy Analysis  
American Association of State Colleges and Universities

## Response

Dear Ms. Keller and Mr. Harnisch,

Thank you for your combined feedback posted on January 17, 2017 responding to a 60-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2017-20. 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.

We appreciate both of your organizations continued participation through the 2016 public comment periods and August 2016 Technical Review Panel (TRP). When NCES started discussing adding a fifth cohort of Pell Grant recipients to the Outcome Measures (OM) survey, APLU commented that this aggregated measure would not be helpful or useful because it would mask too many students. The message conveyed was that every student should be counted. In the same light, the TRP thoughtfully discussed that while there might be heterogeneity between fall, spring and summer admits, institutions could report on a full-year cohort. The inclusiveness of the OM survey and resulting heterogeneity are in contrast to the homogenous Graduation Rate Survey that through its well established first-time, full-time, degree seeking definition possesses the homogeneity described in your comment.

The purpose of the Outcome Measures (OM) survey component is to address the limitations of the Graduation Rates survey component. The collection of graduation rates is defined by statute (*Student Right to Know and Campus Security Act*) and restricted to data collection on first-time, full-time undergraduate students. The OM survey is not defined similarly and thus provides the opportunity to follow the original recommendations of the 2012 Committee on Measures of Student Success, which were to broaden the coverage of student graduation data to reflect a more diverse student population at two-year institutions and improve the collection of the overall student progression and completion data. With this purpose in mind, OM allows for a more complete collection on graduation rates by instructing academic reporters to report on a full year student cohort instead of a Fall census based cohort. This decision was greatly supported by the data users (i.e., Center for American Progress, Complete College America, EdTrust, IHEP, and TICAS) and initially by the Association of Public and Land-Grant Universities. While your organizations and the institutions that you represent may believe there is a lack of integration between OM and the other surveys as well as offering multiple completion rates, NCES does not share these concerns. Rather, the OM data will be enhanced by allowing for the inclusion of more students, in particular students that enroll in the Spring that have not been included in prior cohorts. Before the introduction of OM, there were already multiple graduation rates collected as well, 100%, 150%, and 200% of normal time. The critique was that this collection of graduation rates was limited because it only included Full-time, First-time degree/certificate undergraduates. The IPEDS collection should be seen as a collection that provides a suite of completion data that can accurately measure postsecondary education and enhance discussions on policy and programs that improves the completion rates of all students at the campus, state, and federal levels.

Finally, NCES strongly considered the increased institutional burden and determined that the need to be accountable and transparent to the public outweighs the change in burden, particularly for Pell Grant recipients. NCES conferred with many state data coordinators to investigate the impact of full-year cohort reporting, and many state data coordinators shared that they already use a full-year or annual cohort in their state-level reports to the public, legislature, and policy groups. This circumstance leads NCES to understand that annual cohorts have resulted in burden reductions for many state data coordinators that work with your member institutions to provide data to IPEDS. In 2014-15 the federal government disbursed \$30.3 billion in Pell Grants to 8.4 million full- and part-time undergraduate students ([Federal Student Aid Data Center](#)). The Pell Grant program is a large commitment of public dollars. It is imperative for the federal government to have comparable and comprehensive institutional data that reflects the outcomes of undergraduate and Pell-recipient populations.

We thank you both for taking the time to provide comment.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief

Comments related to OM (Comment number 4)

Document: ED-2016-ICCD-0127-0008

Submitter's Name: Jamey Rorison

Date posted: January 17, 2017



January 17, 2017

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

Dear Ms. Mullan:

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

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

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

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

Sincerely,

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

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

Dear Ms. Voight,

Thank you for commenting on behalf of the 14 postsecondary organizations posted on January 17, 2017 responding to a 60-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2017-20. 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 appreciative of Postsec

Data's support of all the proposed changes to the Outcome Measures survey component. We hope inclusion of more students will enhance and expand our understandings of the postsecondary completions of all students.

We thank you and the 14 organizations for collaborating to provide comment.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief

### Comments related to OM (Comment number 5)

**Document:** ED-2016-ICCD-0127-0009

**Submitter's Name:** Kati Haycock

**Date posted:** January 17, 2017



January 17, 2017

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

Dear Ms. Mullan:

On behalf of The Education Trust — an organization dedicated to closing long-standing gaps in opportunity and achievement separating low-income students and students of color from their peers — thank you for the opportunity to provide comments on the proposed changes for the Integrated Postsecondary Education Data System (IPEDS) 2016–2019 collection (Docket Number ED-2016-ICCD-0127), specifically the changes to the Outcomes Metric (OM).

The proposed changes in this information collection request are based on the recommendations of the Technical Review Panel 50 (TRP), *Outcome Measures 2017-18: New Data Collection Considerations*, held in August 2016. Our higher education research director, Dr. Andrew H. Nichols, who attended the TRP meetings, believes the ensuing report and suggestions accurately and comprehensively capture the conversations. The Education Trust submitted a letter in response to the TRP report and recommendations, and the following comments reflect our continuing views on the proposed OM changes.

Overall, we support the proposed changes outlined in the TRP report and this information collection request. In particular, we believe the decision to create Pell sub-cohorts within each of the original four OM cohorts will greatly improve the quality of the data. As described in the TRP report, this change will prevent Pell graduation rates from being influenced by institutional differences in enrollment patterns among students. Moreover, the decision to create cohorts based upon the receipt of a Pell Grant at entry aligns this new collection with others in the field and ensures the data collected isn't affected by survivor bias.

We do, however, urge the Department to reconsider proposed change #4. The decision to disaggregate the outcome by award type is critical, but we also believe the Pell sub-cohorts

should be disaggregated by credential-seeking status (i.e., degree sought or intent). The award a student receives is critical, but that information is less meaningful without understanding the student's initial goal. Is it a success if the student intended to receive an associate or bachelor's degree but left their institution with a certificate? To us, this is not a successful outcome.

Certainly, requiring institutions to disaggregate the Pell sub-cohorts by credential-seeking status would increase institutional burden, but we believe this additional effort would substantially increase the quality of the OM data collected. We know this can be successfully done, since other voluntary collections (e.g., Access to Success, Complete College America, Student Achievement Measure) — and even the IPEDS Graduation Rate Survey — all have or do collect completion rates by credential-seeking status in some capacity.

Beyond increasing institutional burden, the primary issue with requiring this level of disaggregation was concern with the reliability or accuracy of any student "intent" variable. The concern that institutions may have difficulty capturing this at all or accurately is alarming and certainly an inadequate reason to shy away from asking colleges and universities to collect and report these data. If institutions have difficulty accurately capturing the intent of students as they enroll, it is no wonder that completion rates at many institutions remain low.

As the Department proceeds with changing the OM, this is a unique opportunity to encourage better institutional practice by requiring institutions to disaggregate the Pell sub-cohorts by credential-seeking status. At minimum, institutions should be required to disaggregate the Pell sub-cohorts as institutions do in the IPEDS Graduation Rate Survey by 1) bachelor's degree-seeking and 2) certificate/associate degree-seeking.

Again, we are largely supportive of the proposed changes, and we appreciate your attention to this one area for improvement. We look forward to continuing to work with you and with NCES to improve the quality of higher education data collection in our country.

Sincerely,



Kati Haycock  
CEO  
The Education Trust

THE EDUCATION TRUST

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## Response

Dear Ms. Haycock,

Thank you for your feedback posted on January 17, 2017 responding to a 60-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2017-20. 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 overall supportive comment.

We thank you for sending your delegate to participate in the August 2016 Technical Review Panel (TRP), which discussed a variety of measures to collect better and useful information on all undergraduate students through the Outcome Measures (OM) survey component, which supplements the Graduation Rates (GR) survey component. As accurately summarized in your comment, the TRP discussed thoroughly the advantages and disadvantages of

collecting data on students by degree sought. The TRP recommended that the most beneficial and least burdensome collection would be on degree awarded to student instead of degree sought. Furthermore, OM is not intended to replicate the collection from GR, but to supplement IPEDS existing student success measures. We hope that the suite of IPEDS student completion data will enhance discussions at the campus, state, and federal levels in supporting the postsecondary education progress of all students.

We thank you for taking the time to provide comment.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief

### Comments related to OM and General IPEDS Data Collection (Comment number 6)

**Document:** ED-2016-ICCD-0127-0009

**Name:** Lindsay Ahlman

**Date posted:** January 17, 2017

January 17, 2017

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-0127**

Dear Ms. Mullan:

These comments are in response to the November 15, 2016 Federal Register notice requesting new clearance for the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2017-2020 data collection, and soliciting comments on changes to two survey components.<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 have long recommended that IPEDS collect Pell Grant recipient outcome measures to ensure that students and families have access to comprehensive and reliable completion data that can inform their choices about enrolling in institutions that serve students well. We thank the Department of Education (the Department) for committing to collecting these vital data, and for being responsive to concerns that we and other postsecondary data advocates outlined regarding the collection method initially proposed.<sup>2</sup> We strongly support the currently proposed changes to the Outcome Measure (OM) survey, including the addition of four Pell Grant sub-cohorts for each of the four OM cohorts, which will provide fair and meaningful measures of Pell and non-Pell recipient outcomes. We also support the current proposal to report outcomes disaggregated by the highest award earned, which will enable meaningful comparisons between colleges with different mixes of awards conferred.

In these comments, we reiterate our support of these changes to the OM survey, and offer additional recommendations for improving IPEDS data collection in order to provide students, families, researchers, and policymakers with essential postsecondary data. These recommendations include:

1. Include ED-calculated columns for "percent of adjusted cohort who received an award from your institution" in the 4- and 6-year award status tables.
2. Allow schools to report room and board expenses for students living with family.

<sup>1</sup> U.S. Department of Education. November 15, 2016. Comment Request: Integrated Postsecondary Education Data System (IPEDS) 2016-2019. Federal Register Notice, Docket ID: ED-2016-ICCD-0127. <https://bit.ly/2i1h88c>.

<sup>2</sup> See TICAS. 2016. Comments on IPEDS Pell Graduation Rate Proposal. <https://bit.ly/2h8VTA>, and Postsecondary Data Collaborative. 2016. Comment on Revised Proposal for IPEDS 2016-2019 Data Collection. <https://bit.ly/2d5TJ8Q>.



3. *Collect cumulative debt at graduation for completers of undergraduate certificates, associates degrees, and bachelor's degrees.*
4. *Collect annual non-federal loan data for all undergraduates.*
5. *Collect the number of loan-eligible students to facilitate calculation of institutional participation rate index (PRI)*
6. *Annually update and publish a common school identifier crosswalk*

#### **Comments on Outcome Measure (OM) Survey**

We greatly appreciated the opportunity to participate in the August 2016 Technical Review Panel (TRP) and continue to highlight the importance of collecting outcome data for Pell Grant recipients in the OM survey in order to capture more than just first-time full-time (FTFT) students. 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 both across and within institutions. Having accessible and reliable completion data for Pell Grant recipients will also help students and families make more informed choices about enrolling in institutions that serve all students well. NCES' decision to begin collecting graduation rates for Pell Grant recipients in the 2016-17 IPEDS Graduation Rates (GR) survey is a positive step, but because many Pell Grant recipients are not FTFT, it is essential to also collect Pell Grant recipient outcomes more comprehensively in the OM survey. We strongly support the Department's proposal to do so.

In particular, we thank the Department for revising its initial proposal. As detailed in our prior comments,<sup>3</sup> having institutions report on Pell Grant subcohorts for each of the four OM cohorts (first-time full-time, first-time part-time, non-first-time full-time, and non-first-time part-time), as the revised proposal does, will facilitate meaningful comparisons of outcomes for Pell Grant recipients across institutions, as well as comparisons of outcomes between Pell and non-Pell Grant recipients.

We also applaud the Department for proposing to disaggregate outcomes by highest award. As we outlined in December 2014 comments responding to the "Report and Suggestions from IPEDS Technical Review Panel #45: Outcome Measures," combining all award levels hinders accurate comparisons of outcomes at colleges with different mixes of awards by level because completion rates vary by program length.<sup>4</sup> We support the Department's proposal to collect outcomes by highest award, and suggest that BA-granting institutions report BA attainment among students pursuing a BA either in addition to or as an alternative if the current proposal is determined to be infeasible. This would help ensure that nationally collected data can speak to the rate at which these students achieve their specific educational goals. The reporting requirement would furthermore represent minimal burden because four-year colleges already break out BA-seekers and non-BA-seekers in the GR survey.

1. *Include ED-calculated columns for "percent of adjusted cohort who received an award from your institution" in the four- and six-year award status tables.*

<sup>3</sup> TICAS. 2016. *Comments on IPEDS Pell Graduation Rate Proposal*. [http://ticas.org/sites/default/files/pub\\_files/ticas\\_comments\\_on\\_ipeds\\_pell\\_grad\\_rate\\_proposal.pdf](http://ticas.org/sites/default/files/pub_files/ticas_comments_on_ipeds_pell_grad_rate_proposal.pdf);

<sup>4</sup> TICAS. 2014. *Comments on "Report and Suggestions from IPEDS Technical Review Panel #45: Outcome 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)

The current OM survey includes a calculated column for the percent of the adjusted cohort who received an award from the institution in the six-year award status table. The proposed OM survey includes this column in only the eight-year status table. We recommend including this column in all three award status tables (4-year, 6-year, and 8-year) to provide consistent data for all time periods. Because this column is calculated by the Department, its inclusion in all three award status tables would not represent any additional institutional burden.

#### **Recommended Changes to Other IPEDS Data Elements**

2. *Allow schools to report room and board expenses for students living with family.*

College affordability and attainment continues to be an issue of paramount importance for students, families, and policymakers, so it is critical that national data is able to provide comprehensive information on cost of attendance and student debt. Institutions report in IPEDS their estimated full cost of attendance (COA), which includes personal and living expenses in addition to tuition and fees. These data are used in consumer-facing tools such as the College Scorecard and in the Financial Aid Shopping Sheet, and the estimates help students and families make informed choices about where to attend college and how to pay for it.

Unfortunately, current limitations in IPEDS' cost of attendance data collection can result in an understatement of the true cost some students are likely to face at a given college. The Student Financial Aid (SFA) survey allows schools to report estimated room and board expenses separately for students living on campus and off campus without family, but does not provide an option for reporting these expenses if a student lives off campus with family. Our research identified many colleges that recognize that students living with family incur room and board expenses, and factor these costs into their own COA estimates. Schools are, however, unable to report these estimated expenses for such students in the SFA survey. As a result, federal data on college costs can understate what colleges estimate students' costs to be – in some cases by many thousands of dollars.<sup>5</sup> In order to ensure that federal data contain accurate estimates of the full cost of attending a college, the SFA survey should allow schools to report estimated room and board expenses for students living with families. This change in IPEDS, along with corresponding changes to the federal Net Price Calculator (NPC) template<sup>6</sup> could also allow colleges to include those room and board expenses in their online net price calculator tools as well.

3. *Collect cumulative debt at graduation for completers of undergraduate certificates, associates degrees, and bachelor's degrees.*

Improvement to existing data on cumulative debt at graduation is urgently needed for consumers, colleges, and policymakers. Although it is helpful that the College Scorecard and Financial Aid Shopping Sheet include median cumulative federal debt at graduation, those data are not disaggregated by award

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<sup>5</sup> For an analysis of the differences in estimated costs, see TICAS. 2016. *Federal Cost Data for Student Living at Home Are Significantly Understated*. <http://www.ticas.org/blog/federal-cost-data-students-living-home-are-significantly-understated>.

<sup>6</sup> Information about the Department's NPC template can be found at [https://nces.ed.gov/ipeds/section/net\\_price\\_calculator#Template](https://nces.ed.gov/ipeds/section/net_price_calculator#Template).

level and do not include private loans. Many colleges voluntarily report cumulative federal and non-federal debt data using the annual Common Data Set (CDS). However, these schools represent a fraction of colleges in the country – slightly over half of public and nonprofit four-year colleges, very few for-profit colleges, and no two-year colleges.<sup>7</sup> Additionally, the cumulative debt data from the CDS are limited to bachelor’s degree recipients.

In the absence of private loan data being tracked through NSLDS, we strongly recommend that IPEDS immediately start collecting data on cumulative debt at graduation that includes both federal and non-federal loans for completers of undergraduate certificates, associate's degrees, and bachelor's degrees. To minimize reporting burden and ensure fair comparisons, we suggest applying the CDS definitions already established for questions on this topic to certificates and associate’s degrees as well as bachelor’s degrees.<sup>8</sup> As such, the cohort for reporting cumulative debt at graduation would include all students who started as first-time undergraduates at the reporting institution and earned a certificate or degree (excluding transfer-in students). Colleges would only report loans borrowed at their institution, not debt accumulated at other institutions.

For each award level (certificate, associate’s degree, bachelor’s degree), IPEDS should collect and report the following data points:

- Number of students in graduating class (the cohort as defined above)
- Number of graduating students with any debt, federal debt, and non-federal debt
- Total debt of the graduating class, broken out by all debt, federal debt only, and non-federal debt only

These data would allow the National Center for Education Statistics (NCES) or other stakeholders to calculate the percent of graduates with debt and the average debt per borrower. Minimally, these data should be collected for all student loans, federal student loans, and non-federal student loans separately. Ideally, non-federal loans should be further divided by source (states, colleges, and banks/lenders), as is done in the CDS.

#### 4. *Collect annual non-federal loan data for all undergraduates.*

As student debt levels continue to rise, it is increasingly important that nationally collected data reflect not just borrowing amounts, but also the *type* of loans students borrow. Private (non-federal) loans are one of the riskiest ways to pay for college, generally lacking the flexible repayment plans and other consumer protections built into federal student loans. IPEDS collects data on annual federal and private loan borrowing for first-time, full-time undergraduates’, but only collects data on annual federal loan borrowing for all undergraduates.

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<sup>7</sup> For more information about CDS data, see TICAS. 2016. *Student Debt and the Class of 2015*. [http://ticas.org/sites/default/files/pub\\_files/classof2015.pdf](http://ticas.org/sites/default/files/pub_files/classof2015.pdf).

<sup>8</sup> The 2016-17 Common Data Set includes cumulative debt questions in H4 and H5: [http://www.commondataset.org/docs/2016-2017/CDS\\_2016-2017.pdf](http://www.commondataset.org/docs/2016-2017/CDS_2016-2017.pdf).

Recognizing that a significant proportion of undergraduates are not captured in a first-time full-time cohort, and that private loan originations and outstanding balances continue to grow,<sup>9</sup> consumers and policymakers have an urgent need for timely data about private student loan borrowing among all undergraduate students. Furthermore, almost all private loans are certified by institutions, so schools already have these data.<sup>10</sup> In the absence of the Department including private loans in NSLDS, it is imperative that IPEDS collect these data.

5. *Collect the number of loan-eligible students to facilitate calculation of institutional Participation Rate Index (PRI)*

Colleges facing Title IV eligibility loss due to high cohort default rates (CDRs) can appeal to the Department using the Participation Rate Index (PRI) in order to avoid sanctions based on a CDR that represents a very small share of students who borrow federal loans. This PRI appeal allowance reflects the understanding that CDRs may not be representative indicators of institutional quality at colleges where these rates – which only describe the share of borrowers who default – reflect outcomes for only a small share of students. As such, it serves an integral function in maintaining the integrity of the current Title IV eligibility system and protecting schools from undeserved sanctions. Unfortunately, the opacity of the PRI appeals process leads to confusion, and many schools that would be eligible for an appeal are unaware of the option and unnecessarily withdraw from the federal student loan program to avoid sanction, cutting off students from the safest way to borrow.

As part of the PRI appeals process, the college needs to calculate the total number of students eligible for federal student loans, the total number receiving such loans, the participation rate (number receiving divided by number eligible) and the PRI (participation rate times CDR). Importantly, the data required to calculate the participation rate and the PRI are not available publicly. Although IPEDS collects the number of undergraduates receiving federal student loans, it does not include the total number of *students* receiving federal student loans. In addition, for most colleges, the SFA cohort for these data is fall enrollees only, not all enrollees during a full 12-month award year.

We recommend that IPEDS collect and report the following data points to facilitate the calculation of PRIs:

- Number of students receiving federal Direct Loans (undergraduates and graduate students, full 12-month award year)
- Number of regular students who were enrolled at the institution on at least a half-time basis during any part of the award year

Collecting these two additional data points in IPEDS would give the Department, policymakers, and other stakeholders important context for distinguishing between schools where CDRs are more and less meaningful indicators of institutional quality. It would also help colleges better understand their risk of sanctions, and colleges would still be able to appeal CDR sanctions by following the required process.

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<sup>9</sup> Feshback et al. 2016. *The MeasureOne Private Student Loan Report Q3 2016*. Accessed via <https://www.measureone.com/psl.php> on December 19, 2016.

<sup>10</sup> Ibid.

6. *Annually update and publish a common school identifier crosswalk*

The OPEID/UNITID crosswalks released with the College Scorecard<sup>11</sup> provide an invaluable resource that helps users link data from federal datasets that use different school identifiers. These crosswalks should be statistically reviewed for accuracy, regularly updated, and published on the IPEDS Data Center to ensure this resource is both reliable and made available each year.

Thank you for the opportunity to share our support and recommendations for the collection of these important data. 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

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<sup>11</sup> Crosswalk files are included in the full data download option on <https://collegescorecard.ed.gov/data/>.

## Response

Dear Ms. Ahlman,

Thank you for your feedback posted on January 17, 2017 responding to a 60-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2017-20. 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.

We are appreciative for your support of the proposed changes for the Outcome Measures (OM) survey component starting with the 2017-18 collection year. While we will not require institutions to report outcomes on BA-seeking and non-BA-seeking, as you correctly stated in your comment, we will require institutions to report on the highest degree, which will serve as a more meaningful measure for policy and data research as well as less burdensome for reporting institutions. The recommendation to calculate the percent adjusted cohort at all three time points (i.e., 4-, 6-, and 8-year) on the survey screens is a good one without imposing burden while enhancing the data collection.

For your second recommendation, ‘Allow schools to report room and board expenses for students living with family’, institutions would need to collect additional data for students living with families, as they do not have any way to estimate these types of costs, whereas they can more easily estimate these costs for students living on campus or renting apartments in the local economy. In addition, the variability of these costs would likely make any average number of limited utility for students. For these reasons, we do not see a value in including this new recommendation to the collection.

For the third recommendation, ‘Collect cumulative debt at graduation for completers of undergraduate certificates, associates degrees, and bachelor’s degrees’, this type of collection is more appropriate for the Office of Federal Student Aid, where they have access to student unit record data on students loans. Asking institutions to collect and report this to IPEDS would be duplicative and burdensome for an administrative data collection.

For the fourth recommendation, ‘Collect annual non-federal loan data for all undergraduates’, at this time IPEDS does not have a directive to collect this information, nor has there been enough research into what would be collected in this category. Non-federal loans is a very large category encompassing such things as mortgage refinances, credit cards, more traditional loans, and etc. To truly make this useful information for the federal government, researchers, and students, more research needs to be done to clarify this category for IPEDS. In the meantime, we encourage utilizing the National Postsecondary Student Aid Study (NPSAS) data, another NCES collection which provides information non-federal loan data. Until then, NCES will need to investigate the feasibility of such a recommendation for IPEDS and may consider such a collection in the future, especially if the Department receives a directive.

For the fifth recommendation, ‘Collect the number of loan-eligible students to facilitate calculation of institutional participation rate index (PRI)’, at this time we do not have the directive to collect this level of information. This type of information is more appropriate for the Office of Federal Student Aid, and could be duplicative and burdensome for an administrative data collection.

Finally, for the sixth recommendation, ‘Annually update and publish a common school identifier crosswalk’, IPEDS has begun working on the creation of a common school identifier crosswalk, however, at this time there is not a crosswalk ready for public release by NCES. This project heavily relies on already limited resources and will not be released unless NCES can deliver to the public crosswalk that meets NCES high-quality of standards. As a workaround, IPEDS provides multiple identifiers in the IPEDS Use the Data Tools, which can be used by research organizations to create their own crosswalks.

We thank you for taking the time to provide comment.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief

#### **Comments related to OM (Comment number 7)**

**Document:** ED-2016-ICCD-0127-0013

**Name:** Mark Pioli

**Date posted:** January 17, 2017



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January 17, 2017

## Comments to Proposed 2017-18 Changes in Outcome Measures Survey

### University of Wisconsin System, Office of Policy Analysis and Research

Although we strongly support the Department of Education's efforts to include outcomes data on Pell Grant recipients in the IPEDS Outcome Measures, we have several concerns regarding the changes that have been proposed for the Outcome Measures component (2017-18) as posted for the current federally mandated comment period. Because we felt that our point of view was captured well by other institutions' public comments provided during the previous comment period in Spring 2016 (ID: ED-2106-ICCD-0020-0070), we did not comment at that time. Additionally, the views expressed in the Technical Review Panel #50's report and suggestions align with our position. In particular, the TRP #50 recommended that both the implementation of a full-year entering cohort (rather than the current Fall cohort) and reporting by highest award be delayed.

Of the current four proposed changes, we are particularly concerned with numbers 1 and 4, which we will address separately:

1. *Academic reporters will report on a full-year, entering cohort: Institutions will report using a full-year cohort. Institutions will report during the period between July 1, 2009 and June 30, 2010.*

Concerning the move from a fall cohort to a full-year cohort, we understand that using a full-year cohort will encompass a more complete student population. However, the benefits of having a more complete student population will be outweighed by the following issues:

1. **Inconsistent sets of completion ratios.** The completion ratio in OMS using a full-year cohort will be different from the completion ratio in GRS which uses a Fall cohort. The existence of inconsistent sets of completion ratios will cause confusion when the public tries to use IPEDS data.
2. **Truncated time periods for non-Fall entrants.** Methodologically, using the same cut date to calculate completion ratio for both fall and spring entering students is problematic. For example, when August 31, 2017 is used to calculate the completion ratio for 2011-12 new students, this is a 6-year completion rate for Fall students but represents less than 6 years for Spring students. The 4-year, 6-year, and 8-year completion rates for Spring students are approximately 3.5-year, 5.5-year, and 7.5 year completion rates. Consequently, completion rates for these students will be underreported relative to Fall entrants.
3. **Non-Fall entrants are different.** Students entering in spring may have very different characteristics than students entering in fall. Combining these groups together will make the data less useful and potentially misleading.
4. **Issues in determining unduplicated annual headcount and enrollment status.** Institutions will need to set up rules to determine how to count a student if the student changes enrollment status in different terms, for example, from part-time in fall to full-time in spring. In the Reporting Instructions, it says "Cohort data will be preloaded from the 12-Month Enrollment survey component." However, in the

Universities: Madison, Milwaukee, Eau Claire, Green Bay, La Crosse, Oshkosh, Parkside, Platteville, River Falls, Stevens Point, Stout, Superior, Whitewater.  
Colleges: Beaver/Sauk County, Berne County, Fond du Lac, Fox Valley, Manitowish, Marathon County, Marinette, Menasha/Wood County, Rhinelander, Rock County, Sheboygan, Waikarika, Waupun, Wisconsin Statewide



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current 12-Month Enrollment survey, there is no component for annual unduplicated count by full-time/part-time enrollment status. Also, the 12-Month Enrollment survey includes all students enrolled in *credit activity* while OMS includes *degree/certificate-seeking* students. No entering first-time, degree-seeking cohort is currently defined.

5. **Reporting burden.** Moving to a full-year cohort will add a substantial reporting burden, as would any change in methodology, without a correspondingly significant benefit.
6. **Reduced Timeliness.** Moving to an annual cohort will delay the initial submission of data by institutions as well as the subsequent release of data by IPEDS. The longer the delay, the less relevant the information will be.

4. *At the 4-, 6-, and 8-year award statuses, institutions will report the highest award earned (i.e., certificates/equivalent, associate's or bachelor's).*

The difficulty for us with reporting highest award earned is that there has not been a use case that required us to disaggregate degree data in this manner and doing so could lead to miscounting of completions. For example, first-time students at our comprehensive institutions are assumed to be seeking Bachelor's degrees. If they acquire an Associate's degree or certificate along the way, this could lead to an undercounting of Bachelor's recipients. Changing our practices also would be a considerable burden and result in inconsistent data.

Expanding on the idea of reporting burden, we feel reporting the number of students awarded degrees/certificates from other institutions is a better use of time and energy and will add more value to the OMS than either moving to a full-year cohort or disaggregating outcomes by degree earned. The reporting of former students who graduated from other institutions is currently a hole in the Outcome Measures. We are already required to report on retention data at other institutions. Reporting graduation figures is little additional effort (for us, this information is in the same data file we request from the National Student Clearinghouse), yet it would truly complete the picture of possible outcomes from the standpoint of individual institutions.

To be clear, we concur with and can accommodate the other proposed changes (#2 and #3). We appreciate your taking our concerns into consideration.

Sincerely,

Mark Pioli  
IPEDS Coordinator  
University of Wisconsin System

Universities: Madison, Milwaukee, Eau Claire, Green Bay, La Crosse, Oshkosh, Parkside, Platteville, River Falls, Stevens Point, Stout, Superior, Whitewater.  
Colleges: Baraboo/Sauk County, Barron County, Fond du Lac, Fox Valley, Manitowoc, Marathon County, Marinette, Marshfield/Wood County, Richland, Rock County, Sheboygan, Washington County, Waukesha. Extension: Statewide.

## Response

Dear Mr. Pioli,

Thank you for your feedback posted on January 17, 2017 responding to a 60-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2017-20. 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.

Requiring institutions to report Outcome Measures data on a full-year cohort is imperative to the federal government. The proposed changes would allow for the inclusion of more students, in particular those students that enroll in the



Spring that have not been included in prior cohorts. NCES strongly considered the increased institutional burden to which you provided specific examples by setting up specific coding rules, changing reporting methodology, and reporting at the highest degree awarded. Prior to proposing the changes, we spoke to other state-wide system coordinated institutions, who informed us reporting on a full-year cohort was feasible because they provide annual statistics in their reporting for state level reports. As such, NCES determined that the need to be accountable and transparent to the public outweighs the change in burden, particularly for Pell Grant recipients. In 2014-15 the federal government disbursed \$30.3 billion in Pell Grants to 8.4 million full- and part-time undergraduate students ([Federal Student Aid Data Center](#)). The Pell Grant program is a large commitment of public dollars. It is imperative for the federal government to have comparable and comprehensive institutional data that reflects the outcomes of undergraduate and Pell-recipient populations.

While students who might start in the spring or summer of the entering cohort year may have a truncated time period to fall entrants, they will be captured in the eight year status point. Please remember that the 4-, 6- and 8-year in OM are time points that provide an update of a student's progress toward completion. OM data should not be confused with Graduation Rates data that measures 100%, 150%, and 200% of normal time from the time of entry. Therefore, NCES does not believe there would be reduced timeliness in the data reported to OM as the data are about three status points over an eight year period from point of entry.

We understand that for many institutions, non-fall entrant students may differ in many ways from students admitted in the fall. However, a primary purpose of the Outcome Measures (OM) survey is to address the limitations of the Graduation Rates survey component, which collects data on first-time, full-time (FTFT) undergraduate students, across degree-granting postsecondary institutions. Academic reporting institutions are currently required to report a Fall census based cohort, excluding students that were admitted outside of the Fall census. The limitations of defining a cohort as FTFT and fall census have been a great critique by the current and past Administrations, Congress, and data users. The OM survey component allows for a more complete collection and inclusive depiction of the overall student progression on an increasingly diverse undergraduate student population.

Furthermore, the purpose of the Outcome Measures (OM) survey component is to address the limitations of the Graduation Rates survey component. The collection of graduation rates is defined by statute (*Student Right to Know and Campus Security Act*) and restricted to data collection on first-time, full-time undergraduate students. The OM survey is not defined similarly and thus provides the opportunity to follow the original recommendations of the 2012 Committee on Measures of Student Success, which were to broaden the coverage of student graduation data to reflect a more diverse student population at two-year institutions and improve the collection of the overall student progression and completion data. With this purpose in mind, OM is not intended to replicate the collection from GR, but to supplement IPEDS existing student success measures. We hope that the suite of IPEDS student completion data will enhance discussions at the campus, state, and federal levels in supporting the postsecondary education progress of all students. We also hope that institutions and state coordinators will work with the Department of Education and NCES to help explain the more inclusive suite of student success measures.

Finally, we agree that institutions should also be focused on reporting their transfer out data, but the overall aim of NCES is to support your timely and accurate reporting. We cannot avoid the need to report on all students that attend your institutions as well as those who transfer out. To that end, we will continue to encourage discussions and knowledge-share at our upcoming April 2017 State Coordinator meeting where reporting requirements (i.e., reporting on transfer outs and how to set up reporting on highest degree award) could be made possible. We also hope that the State Coordinator listserv serves as a helpful forum for productive and informative discussions.

We thank you for taking the time to provide comment.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief

**Comments related to OM (Comment number 8)**

**Document:** ED-2016-ICCD-0127-0010

**Name:** Margaret Cohen

**Date posted:** January 17, 2017

I have concerns about the proposal to change the cohort definition for academic year-based institutions. Currently, the cohort is defined as students entering as of a given date in the fall semester. The students could have been new in fall or the preceding summer. Changing the definition to include all students entering the institution from July 1 through June 30th does not fit the calendars of these institutions.

If it was absolutely necessary to have the cohort represent a complete year what would fit the calendar better would be to just add those who enter in spring semester or the winter and spring quarters to the existing cohort. This would maintain some consistency to what institutions have been doing and would make reprogramming to report on the newly defined cohort much less burdensome.

Some issues with the July 1 to June 30th cohort definition are:

1. Students who start June 1 and students who start July 1 all start the same summer but would be assigned to different cohorts. This does not seem logical.
2. The time period to be included as "completed" would be less for those starting June 1 than for those starting July 1. For example, the 6-year period ending August 31 for baccalaureate degree seekers starting June 1 would be 5 years and 3 months while for those starting July 1 it would have 6 years and 2 months.
3. This will create burden for institutions by increasing the number of programs they will need for cohort reporting. The programs necessary for OM won't even be able to build on existing ones.

If this change is implemented, there will be inconsistencies in the definitions of entering cohorts within IPEDS (between GR and OM) and between OM and the disclosures mandated by HEOA. Many consumers will not understand the difference with the potential of making the institution's data suspect.

Finally, how will NCES inform consumers of the data about using two different cohorts?

### Response

Dear Ms. Cohen,

Thank you for your feedback posted on January 17, 2017 responding to a 60-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2017-20. 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.

Requiring institutions to report their Outcome Measures data on a full-year cohort is imperative to the federal government. The proposed changes would allow for the inclusion of more students in particular those students that enroll in the Spring that have not been included in prior cohorts. NCES strongly considered the increased institutional burden and determined that the need to be accountable and transparent to the public outweighs the change in burden, particularly for Pell Grant recipients. In 2014-15 the federal government disbursed \$30.3 billion in Pell Grants to 8.4 million full- and part-time undergraduate students ([Federal Student Aid Data Center](#)). The Pell Grant program is a large commitment of public dollars. It is imperative for the federal government to have comparable and comprehensive institutional data that reflects the outcomes of undergraduate and Pell-recipient populations.

To that end, we appreciate the specific concerns that you brought forth in your comment. Because we have established a July 1-June 30 timeframe for program reporters, it is logical to require academic reporters to follow the same timeframe. In addition, the timeframe aligns with the federal financial aid award year of July 1-June 30. This also aligns with the IPEDS Completion and 12-Month Enrollment surveys.

While students who might start in the spring or summer of the entering cohort year may not have a full six years, they will be captured in the eight year status point. Please remember that the 4-, 6- and 8-year in OM are time points that provide an update of a student's progress toward completion. OM data should not be confused with Graduation Rates data that measures 100%, 150%, and 200% of normal time from the time of entry. NCES strongly considered the increased institutional burden when proposing the changes to the Outcome Measures (OM) survey component.

NCES takes institutional burden seriously and we have contracted with a reputable, independent research office to investigate the time used to completing IPEDS surveys. While we understand there is a marked increase in institutional burden with new changes to OM, we determined that the need to be accountable and transparent now to the public outweighs the change in burden, particularly for Pell Grant recipients.

As a reminder, the purpose of the Outcome Measures (OM) survey component is to address the limitations of the Graduation Rates survey component. The collection of graduation rates is defined by statute (*Student Right to Know and Campus Security Act*) and restricted to data collection on first-time, full-time undergraduate students. The OM survey is not defined similarly and thus provides the opportunity to follow the original recommendations of the 2012 Committee on Measures of Student Success, which were to broaden the coverage of student graduation data to reflect a more diverse student population at two-year institutions and improve the collection of the overall student progression and completion data. With this purpose in mind, OM is not intended to replicate the collection from GR, but to supplement IPEDS existing student success measures. We hope that the suite of IPEDS student completion data will enhance discussions at the campus, state, and federal levels in supporting the postsecondary education progress of all students. We also hope that institutions and state coordinators will work with the Department of Education and NCES to help explain the more inclusive suite of student success measures.

We thank you for taking the time to provide comment.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief

#### Comments related to OM (Comment number 9)

**Document:** ED-2016-ICCD-0127-0011

**Name:** Anonymous Anonymous

**Date posted:** January 17, 2017

Dear Ms. Mullan:

Thank you for the opportunity to comment. There is considerable concern with reporting burden related to the following two proposed OM survey revisions:

Similar to program reporters, all reporting institutions to the OM survey will be given the same instructions when creating their OM cohort:

Institutions will report using a full-year cohort. Institutions will report on students that enrolled during the period between July 1, 2009 and June 30, 2010.

Four Pell Grant sub-cohorts will be reported for each of the four OM cohorts (FTFT, PTFT, FTNFT, and PTNFT).

There will be extreme burden on state IPEDS coordinating agencies that collect higher education institution microdata via annual, standardized submissions and then generate and upload IPEDS OM survey data on their behalf. Pell recipient and full-year enrollment status markers may not have been part of state agency data collection efforts in 2009-10 and, thus, not in a state data system until recently or at all.

Please note data elements captured at the state level are often aligned with state and federal reporting needs. Additional data elements not in state or federal statute are excluded as part of collection efforts to lessen burden at the institution-level. Mandating Pell Grant sub-cohorts and full-year reporting as part of the OM survey now means retroactively establishing cohorts from eight years ago because it was not captured as of part data collection efforts at that time. To do this, supplementary data collection efforts will likely be needed by state agencies. The supplementary submission microdata then have to be woven in to the state longitudinal data system. Once again, this will be extremely burdensome.

Optional reporting or delayed implementation for the Pell Grant sub-cohorts and full-year reporting as part of the OM survey is strongly encouraged to allow for state standardized annual collection and validation to occur for Pell and Enrolment Status markers moving forward.

Realistically, IPEDS should have notified state agencies and higher education institutions nine years ago if they wanted Pell Grant sub-cohorts and full-year reporting.

Thank you.

### Response

Dear Anonymous,

Thank you for your feedback posted on January 17, 2017 responding to a 60-day request for comments on proposed changes to the Department of Education's Integrated Postsecondary Education Data System (IPEDS) 2017-20. 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 strongly considered the increased institutional burden when proposing the changes to the Outcome Measures (OM) survey component. NCES takes institutional burden seriously and we have contracted with a reputable, independent research office to investigate the time used to completing IPEDS surveys. The researchers are currently in the field and will report the results later this year.

While we understand there is a marked increase in institutional burden with new changes to OM, we determined that the need to be accountable and transparent now to the public outweighs the change in burden, particularly for Pell Grant recipients. Delaying or making OM 2017-18 an optional year of reporting was considered prior to posting of the 2017-18 OM changes. However, the federal government disbursed \$30.3 billion in Pell Grants to 8.4 million full- and part-time undergraduate students in 2014-15 ([Federal Student Aid Data Center](#)), making it vital that we begin to collect these data sooner rather than later. The Pell Grant program is a large commitment of public dollars. It is imperative for the federal government to have comparable and comprehensive institutional data that reflects the outcomes of undergraduate and Pell-recipient populations.

We thank you for taking the time to provide comment.

Sincerely Yours,

Richard J. Reeves  
Postsecondary Branch Chief