

May 13, 2013

Ms. Kate Mullan
Acting Director, Information Collection Clearance Division
U.S. Department of Education
400 Maryland Avenue SW, LBJ Room 2E117
Washington, DC 20202-4537
ICDocketMgr@ed.gov
(submitted electronically via: www.regulations.gov)

Dear Ms. Mullan:

We are writing in response to the request for comments on the proposed revision of the Integrated Postsecondary Education Data System (IPEDS), published in the Federal Register on March 14, 2013, docket number ED-2013-ICCD-0029. The Institute for College Access & Success (TICAS) is an independent, nonprofit organization that works to make higher education more available and affordable for people of all backgrounds. By conducting and supporting nonpartisan research and analysis, TICAS aims to improve the processes and public policies that can pave the way to successful educational outcomes for students and for society.

As TICAS has long recommended, incremental changes to IPEDS could result in substantial improvements in the availability of meaningful data about student borrowing and outcomes. In these comments, we recommend specific changes that will greatly improve the information available to consumers, researchers, and policymakers while minimizing reporting burden for colleges.

The recent efforts of the U.S. Department of Education (ED) to make better data available to students and consumers underscore the urgent need for better information on these fronts. Both the College Scorecard and the Financial Aid Shopping Sheet were designed to help students and families make informed decisions about whether and where to attend college and how to pay for it. However, the absence of available good data has led ED to make compromises that may mislead rather than enlighten consumers. For example, without cumulative debt for all colleges, the College Scorecard compares median debt figures that are apples-to-oranges, not distinguishing between colleges where few or all students borrow, or where few or all students graduate.¹

We applaud ED's efforts to expand the collection and reporting of debt and outcome data, and provide detailed comments below.

Cumulative debt at graduation

As noted above, there is an urgent need for better data on cumulative student loan debt for use in the College Scorecard and Financial Aid Shopping Sheet. The best data currently available, from

¹ TICAS. 2013. *New College Scorecard: Two Steps Forward, One Step Back*. <http://views.ticas.org/?p=982>.

the Common Data Set (CDS), is grossly insufficient: they are reported voluntarily by only some four-year colleges, and for bachelor degree recipients only. We commend ED for working toward obtaining better data through the National Student Loan Data System (NSLDS), but such data will not be available until late 2014 at the earliest and will only cover federal student loans. Consumers need better data right now.

We recommend that IPEDS immediately start collecting data on cumulative debt at graduation for completers of undergraduate certificates, associate's degrees, and bachelor's degrees. To minimize reporting burden and ensure apples-to-apples comparisons, we suggest applying the Common Data Set (CDS) definitions already established for questions on this topic to certificates and associate's degrees as well as bachelor's degrees.² That is, collect data for students who started as first-time undergraduates at the reporting institution and count only student debt accumulated at the reporting institution (excludes transfer-in students and debt accumulated at other institutions).

Specifically, for each award level noted above, IPEDS should collect and report the following data points:

- Number of students in graduating class (as defined above)
- Number of graduating students with debt
- Total debt of the graduating class

Collecting those data would allow the National Center for Education Statistics (NCES) or 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).

We recommend collecting these data in IPEDS starting in 2013-14. If and when such data are validated through NSLDS calculations, they may be dropped from required IPEDS reporting.

Graduation rates for Pell recipients

In 2008, the Higher Education Opportunity Act added a requirement that colleges disclose graduation rates for Pell Grant recipients, Subsidized Stafford Loan recipients without Pell Grants, and all other students.³ However, many colleges do not make these data available.⁴ This hampers the ability of researchers, policymakers, and consumers to understand which colleges not only enroll substantial numbers of low-income Pell Grant recipients, but also graduate them.

We commend ED for working toward the collection and reporting of comprehensive data on this topic using NSLDS. However, such data will not be available for several years. Therefore, IPEDS should immediately begin collecting these data, particularly graduation rates for Pell Grant recipients. Minimally, these data should be collected for graduation rates tracking first-

² See: Common Data Set Initiative. <http://www.commondataset.org/>.

³ See 20 U.S.C. 1092(a)(7)(A).

⁴ Education Sector and American Enterprise Institute. 2011. *The Truth Behind Higher Education Disclosure Laws*. http://www.educationsector.org/sites/default/files/publications/HigherEdDisclosure_RELEASE.pdf.

time, full-time students completing within 150% of normal time. As colleges are already required to calculate and disclose these numbers, reporting them to IPEDS would not constitute an additional burden on colleges.

Ideally, a sub-cohort of Pell recipients should be tracked in all of the required cohorts for 2014-15 reporting and beyond, currently proposed as follows:

- Within 150% of normal time for first-time, full-time students
- Four, five, and six years after entry for bachelor's degree-seeking first-time, full-time students.
- Eight years after entry for first-time full-time, first-time part-time, non-first-time full-time, and non-first-time part-time cohorts.

Annual private (non-federal) loan data for all undergraduates

As student debt levels continue to rise, it is important to note that the type of borrowing as well as the amount of borrowing matters. Private (non-federal) student loans are one of the riskiest ways to pay for college, generally lacking the capped, fixed interest rates, flexible repayment plans, and other borrower protections built into federal loans.

Currently, 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. With so many undergraduates following non-traditional pathways through higher education and private student loan volume starting to rise once again, it is crucial that consumers and policymakers have timely data about private student loans for *all* undergraduates at each school, not just those entering as first-time, full-time students. Ideally, these data should be disaggregated by source (state, colleges, or banks/lenders).

We have also long called for ED to track private as well as federal student loans in its student loan database, which is ultimately the best way to provide accurate and comprehensive data on these loans. But as there are no immediate plans to do so, it is imperative that IPEDS collect these data.

Number of loan-eligible students (for CDR PRIs)

Colleges facing the loss of eligibility for federal student aid on the basis of persistently high cohort default rates (CDRs) have a number of ways to appeal to ED to avoid sanctions. Colleges with high CDRs but a low share of students borrowing federal loans may appeal using the Participation Rate Index (PRI). As part of this process, the college calculates the number of students eligible for federal student loans, the number receiving such loans, the participation rate (number receiving divided by number eligible) and the PRI (participation rate times CDR). The PRI recognizes that CDRs may not be representative indicators of institutional quality at colleges where CDRs – which only describe the share of *borrowers* who default – reflect outcomes for only a small share of *students*. However, the data required to calculate the participation rate and the PRI are not available publicly. This is because IPEDS collects the number of undergraduates receiving federal student loans, but not the total number of students receiving federal student loans. In addition, for most colleges, the 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)⁵
- Number of regular students who were enrolled at the institution on at least a half-time basis during any part of the award year⁶

With these data points, NCES, ED, or other stakeholders could calculate colleges' participation rates and PRIs. These data would provide important context for the public and policymakers by distinguishing between schools where CDRs are more and less meaningful indicators of quality. Collecting these figures would also help colleges better understand their risk of sanctions and prevent schools from unnecessarily withdrawing from the student loan program, which cuts students off from the safest way to borrow if they cannot otherwise afford to stay in school.⁷ Colleges would still be able to appeal CDR sanctions using a different 12-month period from the academic year by submitting the relevant data to ED.

Reporting better graduation-rate data

ED has taken a number of promising steps to implement the recommendations of the Committee on Measures of Student Success (CMSS). In particular, ED's proposed changes to IPEDS include a substantial expansion of the graduation rate data collected and reported. For the first time, data would be collected not only for first-time full-time undergraduates, but also for first-time part-time, non-first-time full-time, and non-first-time part-time undergraduates.

We make three recommendations related to how these data should be reported:

- As noted in our earlier comments on this topic,⁸ we strongly recommend that only "vertical transfer" (e.g., 2-yr to 4-yr institution) be included in success measures. The currently proposed way of capturing transfer is to count students who "subsequently enrolled at another institution," which presumes that subsequent enrollment at any other institution of higher education be considered a successful outcome. However, enrolling at one college after another is not necessarily a sign of student success. Consider a student who moves quickly from one college to another because they were not satisfied with the first one, or a student who realizes after a year of coursework that their credits will not transfer and subsequently opts to start over elsewhere. Including these types of subsequent enrollments as successes would make the progression and completion measures *less* meaningful, not more so.
- We also recommend that these graduation rates apply to all institutions, not just degree-granting institutions. Many students choose between certificate programs in a particular field at degree-granting and non-degree-granting institutions. Some colleges are classified

⁵ As defined in 34 CFR 668.195(b)(i) and 34 CFR 668.214(b)(i).

⁶ As defined in 34 CFR 668.195(b)(ii) and 34 CFR 668.214(b)(ii).

⁷ TICAS, 2011. *Still Denied: How Community Colleges Shortchange Students by Not Offering Federal Student Loans*. http://projectonstudentdebt.org/files/pub/still_denied.pdf

⁸ TICAS, 2012. *Comments in response to the "Report and Suggestions from IPEDS Technical Review Panel #37, Selected Outcomes of Advisory Committee on Measures of Student Success."* http://www.ticas.org/files/pub/TICAS_comments_on_TRP37_CMSS_final_05-29-12.pdf.

as degree-granting on the basis of a small number of degrees, but are in fact predominantly certificate-granting institutions.

- Finally, because the time it takes to complete a degree or certificate matters, IPEDS should collect the outcomes status of each cohort twice: four years and eight years after entry for four-year colleges and three years and six years after entry for two-year colleges. This was one of the options originally put forward for consideration by the technical review panel (TRP) on this topic. As currently proposed, all degree-granting institutions would report outcomes data for these cohorts only once, eight years after students' entry.

Better data about and for veterans and service members

As noted in the IPEDS TRP report on this topic,⁹ since the Post-9/11 GI Bill went into effect in August 2009, there has been substantial growth in the number of students receiving education benefits for veterans or service members and the total dollars received under these programs, reaching a total of \$8 billion in fiscal year 2010. It is critical that veterans and service members, policymakers, and the public have sufficient information about participating colleges to ensure that this investment is not only supporting increased access for this student population, but also that it is helping them to complete meaningful post-secondary credentials without incurring burdensome levels of debt.

Specifically, these stakeholders are interested in where these students enroll, what services are offered for them, how successful they are at different institutions, and what the costs are for students and taxpayers. The current proposal includes appropriate changes to IPEDS to collect information on veteran and service member enrollment and access to services. However, these changes do not go far enough, as they neglect crucial questions about outcomes and provide very limited information about costs for these student populations. Specifically:

- ***It is crucial to track not only where these students enroll but also where they are successfully completing degrees and certificates.*** Just showing how many veterans and service members have enrolled at a particular school, what services that school provides, and limited information on tuition benefits received at that school will do little to help these students determine how much it will cost them to attend or their odds of success. Indeed, it could mislead veterans and service members to see the enrollment of a lot of students like them and the availability of certain services as direct indicators of institutional quality and value.

To correct for this, we recommend that IPEDS collect data on the number of veterans and service members completing degrees or certificates by award level and field of study (CIP Code). Veterans and service members should be disaggregated in the current retention rates. For graduation rates, minimally these student populations should be disaggregated when tracking first-time, full-time students graduating within 150% of normal time. Ideally, they should be disaggregated in the new graduation rate data

⁹ RTI International. 2012. *Report and Suggestions from IPEDS Technical Review Panel #36 Collecting Data on Veterans.*

https://edsurveys.rti.org/IPEDS_TRP/documents/Report%20and%20Suggestions%20from%20TRP36_final.pdf

collected under ED's proposed changes. Given that colleges are already required to identify veterans and service members in some ways (e.g., the process of benefit certification or self-identification on the FAFSA), tracking their outcomes should not be burdensome.

- ***Information about affordability is also crucial both for veterans and service members and for policymakers.*** We commend ED for including in the proposed changes data on the number of undergraduates receiving assistance from Post-9/11 GI Bill and Department of Defense (DoD) Tuition Assistance and the total tuition and fee amounts received by these students. This information is already available to institutions, and the collection and dissemination of it will shed important light on where substantial federal investments are being made.

We urge ED to continue to work with the Department of Veterans Affairs (VA) to make more comprehensive data available on the number of students receiving benefits under all VA and DoD programs and the total dollar amounts received under these programs.

Our previous comments on this topic include additional recommendations, including incorporating military/veterans benefits into net price calculators.¹⁰

Data integration

The lack of a common identifier for colleges across different federal datasets continues to pose substantial challenges to users of ED's data, including consumers, researchers, and policymakers.¹¹ Until common identifiers among NCES, Federal Student Aid (FSA), the Office of Postsecondary Education (OPE), and federal agencies outside the department, such as VA and DoD are established, ED should minimally provide a definitive crosswalk and mapping tools to help users integrate FSA data with IPEDS data using OPEID numbers. Within IPEDS, ED can take the simple step of asking all colleges for all eight-digit OPEID numbers that correspond to each UNITID every year. Including this information in the institutional characteristics data released on the IPEDS Data Center would be a first step toward providing a comprehensive crosswalk.

Marketing/recruiting expenses at for-profit colleges

ED's proposed changes to IPEDS include increasing the level of detail in for-profit colleges' reporting of revenues, expenses, assets, and liabilities. While this represents a good first step, IPEDS should also collect data on expenditures for recruiting, advertising, and marketing. In this, we concur with the comments submitted by Senator Tom Harkin, Representatives Elijah

¹⁰ TICAS. 2012. *Comments in response to the "Report and Suggestions from IPEDS Technical Review Panel #36, Collecting Data on Veterans."*

http://www.ticas.org/files/pub/TICAS_comments_on_TRP36_veterans.pdf.

¹¹ See: TICAS. 2012. *Report from Education Department Advisory Group Calls for Improvements to Financial Aid Data.* <http://views.ticas.org/?p=842>.

Cummings and Raúl Grijalva, and the National Association for College Admission Counseling (NACAC) in response the TRP on this topic.¹²

Thank you for the opportunity to share our suggestions and concerns on this important topic. Please feel free to contact me or my colleague Matthew Reed via email at ljasher@ticas.org or mreed@ticas.org, or by phone at (510) 318-7900, with any questions.

Sincerely,



Lauren Asher
President

¹² For example see: Reps. Cummings and Grijalva. 2012. *Comments in response to the “Report and Suggestions from IPEDS Technical Review Panel #39, Improving Finance Survey Forms for For-Profit Institutions.”* <http://democrats.oversight.house.gov/images/stories/2012-12-07.%20EEC%20to%20IPEDS%20Project%20Director%20RE%20Comments%20to%20TRP.pdf>.