

September 9, 2013

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  
[ICDocketMgr@ed.gov](mailto:ICDocketMgr@ed.gov)  
(submitted electronically via: [www.regulations.gov](http://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 August 8, 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, as interest in these data from all quarters continues to grow. The recent efforts of the U.S. Department of Education (ED) to make better data available to students and consumers through the College Scorecard and the Financial Aid Shopping Sheet underscore the urgent need for better information on these fronts. For example, without cumulative debt at graduation 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.<sup>1</sup>

We appreciate the detailed response to our May 2013 comments on this proposal, included in the supporting documents of the current request for comments.<sup>2</sup> In particular, we acknowledge the need to minimize reporting burden, but point out below where our recommendations would not constitute an additional burden or where the benefits to students, families, and policymakers justify limited additional reporting. In several cases, IPEDS is the best vehicle for collecting the data and making them widely available in a timely fashion. In this submission, we respond to ED's concerns about selected recommendations and provide additional comments on changes to ED's proposals.

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<sup>1</sup> TICAS. February 13, 2013. Blog post. "New College Scorecard: Two Steps Forward, One Step Back." <http://views.ticas.org/?p=982>.

<sup>2</sup> U.S. Department of Education, National Center for Education Statistics. 2013. "Public Comments Received During a 60-day Comment Period and NCES Responses." <http://1.usa.gov/17RgV89>.

## **Cumulative debt at graduation**

There is an urgent need for better data on cumulative student loan debt at graduation, and collecting these data in IPEDS is the only way to make comprehensive institution-level debt data widely available in the near future. While we commend ED for working toward obtaining cumulative debt data through the National Student Loan Data System (NSLDS), such data will not be available until late 2014 at the earliest. They will also be incomplete, since private (non-federal) student loans are not included in that database. ED's response also mentions the availability of cumulative debt data in the National Postsecondary Student Aid Study (NPSAS) and the postsecondary longitudinal sample surveys. Although those data are helpful for analyzing national student-level patterns, the data cannot be broken out by institution or state and are not available every year.

With a new version of the College Scorecard due to be released this fall and the second annual release of the Financial Aid Shopping Sheet due to be released this winter, comprehensive data on cumulative debt at graduation are needed as soon as possible. Therefore, we continue to recommend that IPEDS immediately start collecting data on cumulative debt at graduation for completers of undergraduate certificates, associate's degrees, and bachelor's degrees.

## **Graduation rates for Pell Grant recipients**

Similarly, collecting graduation rates for Pell Grant recipients in IPEDS is the best way to make that information widely available in the near future. While we commend ED for working toward the collection and reporting of comprehensive data on this topic using NSLDS, such data may not be available for several years, and the utility of these data cannot be evaluated until they are available.<sup>3</sup> Also, as mentioned above, NPSAS does not have data at the institution level.

Additionally, collecting these data in IPEDS would not constitute an additional reporting burden because colleges are already required to calculate and disclose graduation rates for Pell Grant recipients, Subsidized Stafford Loan recipients without Pell Grants, and all other students.<sup>4</sup> Unfortunately, an investigation found that many colleges do not make these data available.<sup>5</sup> This uneven compliance and the decentralized nature of the data that are disclosed hamper 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. The only colleges for which this reporting requirement would constitute additional burden are those that are not already calculating and disclosing the data, and as such are not complying with federal law. The additional burden on noncompliant colleges should not be of concern to the Department, and in fact, bringing them into compliance should be a goal. Therefore, IPEDS should immediately begin collecting graduation rates for Pell Grant recipients.

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<sup>3</sup> NSLDS recently revised reporting rules to help facilitate calculation of graduation rates for financial aid recipients. The first full year after these revisions went into effect is 2013-14, which means six-year graduation rates for students entering four-year colleges this year will not be available until at least 2019.

<sup>4</sup> 20 U.S.C. 1092(a)(7)(A).

<sup>5</sup> Education Sector and the American Enterprise Institute. 2011. *The Truth Behind Higher Education Disclosure Laws*. [http://www.educationsector.org/sites/default/files/publications/HigherEdDisclosure\\_RELEASE.pdf](http://www.educationsector.org/sites/default/files/publications/HigherEdDisclosure_RELEASE.pdf).

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

We strongly urge ED to discuss options for collecting data on private borrowing for *all* undergraduates, not just first-time, full-time students, at a meeting of the IPEDS Technical Review Panel (TRP), as suggested in NCES' response to our May 2013 comments.<sup>6</sup> With more students following non-traditional pathways through higher education and private student loan volume beginning to rise again, it is crucial that consumers and policymakers have timely data about private student loans for *all* undergraduates at each school. The value of these new data would justify the additional reporting, particularly because IPEDS is uniquely positioned to collect data that are available to colleges but not otherwise available to ED. At this time, colleges are still the best source of data on private student loan usage at the institution level. Lenders currently require school certification for the vast majority of private loans, so schools do have information on most such loans. A TRP would provide a valuable opportunity to discuss the best ways colleges can overcome any challenges to reporting based on the information available to them and provide the most helpful data on their students' private loan borrowing.

## **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), but we are disappointed to learn that the Department has decided to postpone collection of the expanded outcomes measures from 2014-15 to 2015-16. Consumers, policymakers, and colleges all need these new data to inform ongoing decisions and cannot afford to wait four years for these new data to become available.

In our May 2013 comments, we recommended that only "vertical transfer" (e.g., 2-yr to 4-yr institutions) be included in success measures because subsequent enrollment at any other institution of higher education, regardless of level, is not necessarily a sign of student success. We agree with ED and the TRPs that it would be more helpful to collect data on the level of program students transfer into rather than the level of the college's overall offerings, but that degree of fine-grained data collection would be too burdensome at this time. However, that limitation does not preclude making any changes to the student success measures. Although imperfect, including only "vertical transfers" based on institution level is still more meaningful than counting all subsequent transfers in determining what counts as a student success.<sup>7</sup> Furthermore, reporting the institution level of a transfer student's new school would not constitute a significant burden. Since colleges reporting transfer data already document that a former student has subsequently enrolled at another school, there is very little additional burden to record the level of the student's new school as listed in IPEDS.

In addition, we concur with comments submitted by representatives of community colleges that 2-year schools should report the outcome measures six years after a student's entry. This would

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<sup>6</sup> U.S. Department of Education, National Center for Education Statistics. 2013. "Public Comments Received During a 60-day Comment Period and NCES Responses." <http://1.usa.gov/17RgV89>.

<sup>7</sup> One way to further refine this information is to identify the school the student transfers to by the predominant credential it awards, rather than the highest award it offers. The predominant credential is already used for several institutional comparisons in the College Scorecard and Financial Aid Shopping Sheet.

reduce burden on these schools by aligning with other reporting requirements. We agree with ED's proposal to collect outcome measures eight years after a student's entry at 4-year schools.

### **Better data about and for veterans and service members**

We recommend that IPEDS also collect data on completions and retention in addition to the data on veteran and service member enrollment and access to services included in the current proposal. As noted in ED's response to our May 2013 comments, collaboration between ED, the Department of Veterans Affairs (VA), and the Department of Defense (DoD) is ultimately the best way to collect these data and provide them to consumers and policymakers.<sup>8</sup> However, until such data are available, IPEDS is still the best vehicle for collecting data on these student populations so the data can be included in ED's consumer information tools as soon as possible.

### **Data integration**

We continue to strongly urge ED to address in a concrete way the problems created by the lack of a common identifier for colleges across different federal datasets.<sup>9</sup> We acknowledge that the identifiers were created for different purposes, but believe that ED still can, and should, at a minimum create a definitive crosswalk and mapping tools to help users integrate Federal Student Aid (FSA) data with IPEDS data using OPEID numbers. In a June 2012 presentation, NCES staff indicated that work was progressing on those tools, yet no such tools have been made available.<sup>10</sup> We strongly urge NCES, FSA, and the Office of Postsecondary Education (OPE) to move forward with this project as quickly as possible. Ultimately, ED should continue to work toward common identifiers for colleges across all federal agencies, including identifying and making public any statutory or regulatory changes that may be needed to make this possible.

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](mailto:ljasher@ticas.org) or [mreed@ticas.org](mailto:mreed@ticas.org), or by phone at (510) 318-7900, with any questions.

Sincerely,



Lauren Asher  
President

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<sup>8</sup> U.S. Department of Education, National Center for Education Statistics. 2013. "Public Comments Received During a 60-day Comment Period and NCES Responses." <http://1.usa.gov/17RgV89>.

<sup>9</sup> For more information, see TICAS. March 2, 2012. Blog post. "Report from Education Department Advisory Group Calls for Improvements to Financial Aid Data." <http://views.ticas.org/?p=842>.

<sup>10</sup> U.S. Department of Education, National Center for Education Statistics. June 4, 2012. Presentation at 2012 Forum of the Association for Institutional Research (AIR), New Orleans, LA. "IPEDS R&D: An Update on CMSS, NPEC, and TRPs."