

March 2, 2012

Ms. Janice Kelly-Reid  
IPEDS Project Director  
RTI International  
3040 East Cornwallis Road  
Post Office Box 12194  
Research Triangle Park, NC 27709-2194  
(sent via email to: [ipedsTRPcomment@rti.org](mailto:ipedsTRPcomment@rti.org))

Dear Ms. Kelly-Reid:

These comments are in response to the “Report and Suggestions from IPEDS Technical Review Panel #36, Collecting Data on Veterans.” 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 appreciate the opportunity to comment on this important topic.

As noted in the report, 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 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 Technical Review Panel’s report identifies a number of important questions and suggests appropriate changes to the Integrated Postsecondary Education Data System (IPEDS) to collect information on veteran and service member enrollment and access to services. However, the recommendations do not go far enough, as they neglect crucial questions about outcomes and provide very limited information about costs for these student populations.

***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.

Just as the panel rightly concluded that “an indicator of ‘military friendly’ on College Navigator will appear as an endorsement of program quality by the National Center for Education Statistics (NCES),” collecting enrollment and student service data without any indication of how successful students are after they enroll could have the same effect.

The panel suggested that limitations in data systems and available data make reporting of completions, retention, and graduation rates of veterans and service members in IPEDS infeasible at this time. However, the panel clearly endorsed the collection of enrollment data for veterans and service members using existing methods of identifying them (e.g., the process of benefit certification or self-identification on the FAFSA). Once students are flagged as veterans or service members for enrollment reporting, it should be possible to report their completion, retention and graduations rates. Since these data will not be reported until 2014-15, colleges should have more than enough time to adjust their data systems, and NCES and RTI will have time to provide technical assistance.

***Information about affordability is also crucial both for veterans and service members and for policymakers.*** We agree with the panel's recommendation to start collecting data in IPEDS about 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 also agree with the panel's recommendation that NCES should 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.

However, there are additional steps that the Department of Education (ED), DoD, and VA can and should immediately take to help veterans, service members, and policymakers assess and compare the cost of attending individual institutions. Specifically, we urge ED's NCES, DoD, and VA to work with colleges to incorporate information about military benefits into the federally required net price calculators on college web sites. These calculators provide individualized estimates of the "net price," which is the full cost of attendance less available aid. At a minimum, net price calculators (and the net price section of College Navigator) should clearly state whether military benefits are included in the college's calculation of net price and provide links to further information about these programs.

Thank you for the opportunity to share our suggestions and concerns on this important topic. Please feel free to contact me or my colleague Matt 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