

May 29, 2012

Ms. Janice Kelly-Reid  
IPEDS Project Director  
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(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 #37, Selected Outcomes of Advisory Committee on Measures of Student Success.” 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 and agree that improvements to graduation rate calculations will help make the rates more meaningful and comparable.

We agree with the technical review panel (TRP) that “adding a part-time, first-time degree/certificate-seeking cohort to the component significantly increases the percentage of students included in outcome measures.”<sup>1</sup> The TRP made progress toward implementing the addition of such a cohort to student success reporting in IPEDS. However, we believe that the wording of some of the TRP’s suggestions could lead to the collection and reporting of data that are significantly less meaningful and/or comparable than intended. We discuss our concerns and suggestions below.

### **The Definition of Degree/Certificate-Seeking**

The current definition of degree/certificate-seeking leaves the determination of this status largely up to the institution. The additional language proposed by the technical review panel (TRP) appropriately clarifies that students who receive federal financial aid, receive state or local aid for which being degree/certificate-seeking is a requirement, or obtain a student visa *must* be included in this cohort. These are important clarifications, though as currently drafted they may suggest that only these students should be included in the cohort. We recommend the following change to the proposed definition (edits in bold underline):

“Students enrolled in courses for credit and recognized by the institution as seeking a degree, certificate, or other formal award. **In addition to including students who demonstrate an intent to achieve one of these goals based on their stated intent or coursetaking patterns, this cohort must include all students who . . .**”

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<sup>1</sup> [TRP report](#), p. 8.

These clarifications will help improve the quality of the success measures data for both full-time and part-time students by helping institutions construct more accurate degree/certificate-seeking cohorts.

### **Defining Transfer Success**

We agree with the TRP that counting completions of degrees and certificates (awards) alone may not give a full picture of student success for many institutions. However, by suggesting that all students who subsequently enroll at any other institution of higher education be counted as successful outcomes, the panel's recommendation goes much too far. Including all subsequent enrollments as successes would make the progression and completion measures *less* meaningful, not more so.

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. In neither of these examples is subsequent enrollment at a second college a sign of "success" at the first one. Yet the panel's proposed definition would actually count them as a success for the first college, making it harder for students, consumers, and policymakers to determine where serious problems of institutional quality lie.

We appreciate the very real data limitations highlighted by the TRP and understand that a perfect measure of transfer success is not currently available. A robust measure would look not only at whether a student subsequently enrolled elsewhere, but also whether their reenrollment occurred in a more advanced program, with credits from the first institution that count toward the credential at the second. But the substitute for perfect information must not be such grossly imperfect and misleading information. Until better data are available, we strongly recommend that student transfers included in success metrics be limited to "vertical transfers" (e.g., from a 2-year institution to a 4-year institution, or from one granting primarily Associate degrees to one granting primarily Bachelor's degrees).

The panel also recommended colleges report a combined, unduplicated rate including those who either earn an award or transfer. Particularly given our concerns about the definition of transfer, we would urge you to require colleges to report these success categories separately, either exclusively or in addition to a combined, unduplicated rate.

### **Which Institutions Report on Part-Time Students**

The stated purpose of adding a part-time cohort to student success reporting is to broaden the set of students included in these measures. Therefore, any data collected about a part-time, first-time cohort should be required for all colleges, not just a subset of colleges. Program-year reporters and less-than-two-year colleges should not be excluded, as this would leave consumers and policymakers without data about the success of part-time students at a large number of colleges. In addition, any new data elements collected for the part-time, first-time cohort should also be added to the data collected for the existing full-time, first-time cohort.

### **Other Issues Raised by the Committee on Measures of Student Success**

In advance of the TRP, we shared with NCES staff our thoughts about the goals and priorities of the CMSS and subsequent IPEDS TRP. That email is attached to these comments for reference. While we understand that the scope of this TRP was limited and unable to address all of the

issues raised by the CMSS, we do hope that the Department moves soon to require colleges to report on outcome data for specific cohorts of financial aid recipients. In particular, the graduation rates colleges are already required to calculate and disclose for Pell Grant recipients should also be reported to the Department through IPEDS.

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,

A handwritten signature in black ink, appearing to read 'Lauren Asher', with a stylized flourish at the end.

Lauren Asher  
President

## Matt Reed

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**From:** Matt Reed  
**Sent:** Thursday, February 23, 2012 1:45 PM  
**To:** Cubarrubia, Archie  
**Cc:** Miller, Elise; 'Kelly-Reid, Janice E.'  
**Subject:** CMSS TRP

Dear Archie,

As Janice Kelly-Reid suggested, I am writing to you to share our thoughts on graduation rates ahead of the IPEDS TRP on “Selected Outcomes of Advisory Committee on Measures of Student Success” scheduled for February 28-29, 2012. After reading the committee’s final report and the report of the 2008 TRP on graduation rates (which I participated in), we would like to suggest some guiding questions and other points that will be important for the TRP to consider.<sup>[1]</sup>

Expanding the cohort for graduation rates beyond the first-time, full-time, degree-seeking (FTFT) students currently included will yield important new information about persistence and attainment at the college level. CMSS’s recommendation that a first-time, *part-time*, degree-seeking cohort be added to IPEDS graduation rate reporting is an important step in this direction. As the CMSS report notes, clarifying the definition of “degree-seeking” is an important part of the process for implementing this recommendation. A good definition will capture the substantial population of beginning students who start full-time **or** part-time and are seeking a degree or certificate but will exclude most of the students who are taking a course or two without any stated intention of seeking a credential. Doing this with integrity and fidelity is crucial: being too *inclusive* of very part-time students (e.g., those attempting very few credits in the first year) will deflate graduation rates unnecessarily, while being too *exclusive* will inflate them inappropriately. As such, careful consideration is needed to ensure that the new rates convey meaningful information.

The CMSS recommends that colleges report graduation rates for financial aid recipients. Colleges are already required to calculate and disclose graduate rates for Pell recipients and other categories defined by financial aid status, but few colleges post this information on their web sites.<sup>[2]</sup> Collecting and disseminating these data for the sub-cohort of Pell recipients is particularly important, as such data would help shed needed light on the question of which colleges are successful at enrolling and graduating low-income students. The 2008 TRP suggested a workable way to add the Pell sub-cohort to IPEDS graduation rate reporting, which should be implemented as soon as possible. As the CMSS report suggests, ultimately the best way to collect these data at the college-level is through the National Student Loan Data System (NSLDS) or other Federal Student Aid (FSA) data systems. We hope the TRP will consider both how to add these data to IPEDS right away and how colleges and the Department can work together to use data from NSLDS to minimize the reporting burden for colleges.

Many beginning students take developmental courses in at least one subject before moving on to college-level courses. The share of students taking developmental courses at each college would be a useful piece of context when interpreting graduation rates. However as noted by the report, collecting consistent and comparable data on this topic may be challenging, and collecting data that is incomparable may create less clarity rather than more. We suggest framing the issue with guiding questions such as:

- To what extent can colleges supply these data based on a standardized definition of developmental courses?
- Can colleges differentiate degrees of “college readiness” in a consistent and comparable manner?

For many students at two-year colleges, successful “vertical” transfer to a four-year college is a successful outcome and should be included among success measures. However, “horizontal” transfer to another two-year

college is not an unambiguous success in the same way. Therefore, horizontal transfers should be counted separately or not counted at all. Similarly, substantially preparing a student for transfer is not the same type of “success” as the student earning a degree or certificate or successfully transferring to another college. Two guiding questions to consider are:

- What steps are needed to support colleges in reporting “vertical” transfers separately from “horizontal” transfers?
- Should students “successfully prepared for transfer” without a credential or successful transfer to another college be counted in an overall success measure?

We appreciate your consideration of our thoughts on this topic. If you have any questions, my contact information is below.

Best,  
Matt

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<sup>[1]</sup> Committee on Measures of Student Success. 2012. *A Report to Secretary of Education Arne Duncan*. <http://www2.ed.gov/about/bdscomm/list/cmss-committee-report-final.pdf>. Accessed February 14, 2012; RTI International. 2008. *Report and Suggestions from IPEDS Technical Review Panel #24 Collecting GRS Data for Part-Time Students and Pell Grant Recipients*. [https://edsurveys.rti.org/IPEDS\\_TRP/documents/TRP\\_24\\_Collecting\\_GRS\\_data\\_on\\_part-time\\_students\\_and\\_Pell\\_grant\\_recipients.pdf](https://edsurveys.rti.org/IPEDS_TRP/documents/TRP_24_Collecting_GRS_data_on_part-time_students_and_Pell_grant_recipients.pdf). Accessed February 14, 2012.

<sup>[2]</sup> Education Sector. 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). Accessed February 14, 2012.