

December 8, 2014

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)

Dear Ms. Kelly-Reid:

These comments are in response to the “Report and Suggestions from IPEDS Technical Review Panel #45: Outcome Measures.” 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 potential changes to the Outcome Measures (OM) component of the Integrated Postsecondary Education Data System (IPEDS). The existing OM survey, currently in a preview year and slated for mandatory data collection in 2015-16, expands on the Graduation Rate Survey (GRS) in important ways, adding data about part-time and non-first-time entering students. However, further enhancements are needed to provide the data needed by consumers, researchers, and policymakers. Specifically, we recommend the following:

- disaggregating award recipients by award level;
- collecting outcomes data twice for each cohort, covering outcomes at two, three, four, six, and eight years after entry;
- collecting data on graduation rates for Pell grant recipients; and
- adding non-degree-granting institutions.

Outcomes for colleges offering multiple award levels

The TRP report raises the question of whether counts of award recipients should be disaggregated by award level (i.e., reporting the number of completers separately for undergraduate certificates, associate’s degrees, and bachelor’s degrees).¹ We strongly support such disaggregation. Combining all award levels would make it difficult to make meaningful comparisons between colleges with different mixes of awards by level (e.g., two colleges with a 75% completion rate where one awards primarily bachelor’s degrees and one awards primarily short-term certificates) because completion rates for shorter-term programs tend to be higher simply due to the smaller number of credits required. Colleges already record the level of each award for reporting elsewhere in IPEDS so this would not impose a substantial reporting burden and would produce much more meaningful, comparable data. If the OM survey continues to

¹ TRP Report, p. 5.

combine all award recipients across levels, we suggest counting only awards earned within 150% of normal time as is currently done for the Student Right to Know (STRK) graduation rates.

Time Intervals for Data Collection

Along with determining *how* outcomes should be reported, the TRP report discusses options for *when* the outcomes should be reported:

- Option 1: outcomes after two, three, and four years, reported four years after students enter, and outcomes after six and eight years, reported eight years after students enter;
- Option 2: outcomes after two, three, and four years reported four years after students enter, outcomes after five and six years, reported six years after students enter, and outcomes after seven and eight years, reported eight years after students enter.²

We suggest using Option 1 as it provides more data than are currently available from the OM survey but poses a more moderate increase in reporting burden for colleges compared to Option 2. Option 1 also has the potential for more streamlined and less confusing presentation of OM data each year.

Graduation Rates for Pell Grant Recipients

As we have recommended in previous comments,³ IPEDS should immediately begin collecting graduation rates for Pell Grant recipients. Such data will help researchers, policymakers, and consumers 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. This is the only way to obtain and disseminate these data immediately. As discussed in the TRP report, there are limitations which prevent other sources, such as the National Student Loan Data System (NSLDS), from being used to calculate graduation rates or other outcome measures at this time.⁴

Coverage of Institutions

The current OM survey includes only degree-granting institutions, leaving out about 2,500 non-degree-granting schools.⁵ For students considering an undergraduate certificate program in a given field, the choices often include both degree- and non-degree-granting schools. Further, non-degree-granting schools account for a substantial share of certificate completions, with over one-third of undergraduate certificate recipients in 2012-13.⁶ We strongly recommend that non-degree-granting institutions be required to report outcome measures as well as degree-granting institutions. Non-degree granting schools are required to report on the IPEDS graduation rate survey, and there is no reason to justify the exclusion of these schools on this survey.

² TRP Report, p. 6

³ See for example: TICAS. 2013. *TICAS IPEDS Comments*. http://www.ticas.org/pub_view.php?idx=914.

⁴ TRP Report, pp. 11-13.

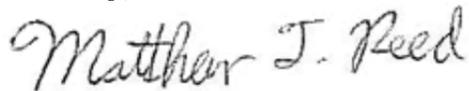
⁵ Calculations by TICAS on data from U.S. Department of Education, Integrated Postsecondary Education Data System. Figures represent colleges listed with an assigned sector in the 50 states and DC that reported 12-month undergraduate enrollment for 2012-13.

⁶ Ibid.

We agree with the TRP that, “In the absence of a coordinated student unit record system, the need for more outcome information must be balanced with the potential reporting burden institutions face in collecting outcomes information,” and that “collecting data on the progression and completion of students could best be captured through student-level data, rather than institution-level data.”⁷ Using student-level data is likely to yield more comprehensive outcomes data with less reporting burden for colleges. Within the current institution-level data collection system, another way to reduce burden would be to better align or combine the Graduation Rates, 200% Graduation Rates, OM components, and the retention rate questions from the Fall Enrollment component of IPEDS.

Thank you for the opportunity to share our suggestions on this important topic. Please feel free to contact me with any questions at mreed@ticas.org or (510) 318-7900.

Sincerely,

A handwritten signature in cursive script that reads "Matthew J. Reed".

Matthew Reed
Program Director

⁷ TRP Report, p. 7.