

April 18, 2016

Kate Mullan
Acting Director
Information Collection Clearance Division
U.S. Department of Education
400 Maryland Ave, SW
LBJ, Room 2E103, Washington, DC 20202
(submitted electronically via regulations.gov)

Re: Docket ID ED-2016-ICCD-0020

Dear Ms. Mullan:

These comments are in response to the February 18, 2016 Federal Register notice soliciting input on proposed changes to the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS) data collection.¹ 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 applaud the Department of Education (the Department) for proposing to collect data on Pell Grant recipients' college outcomes in IPEDS, as TICAS and many other groups have recommended for years. Collecting and disseminating these data via IPEDS would provide students, policymakers, institutions, and policy researchers with critical information on how outcomes for low-income students vary across institutions, and how they compare with the outcomes of more well-resourced classmates. Having accessible and reliable completion data for Pell Grant recipients will also help students and families make informed choices about enrolling in institutions that serve all students well.

However, the proposal put forward by the Department is highly problematic, because it unnecessarily blurs distinctions between student groups and restricts the ability to make comparisons across colleges. To address this problem, the Postsecondary Data Collaborative offers several options that would provide more meaningful data than the current proposal. We support one of these options, to disaggregate each Outcome Measures (OM) cohort by Pell status using the existing OM survey, because we believe it offers the best balance between institutional burden resulting from increased reporting requirements and robust and useful measures of Pell student outcomes.

Concerns with the Proposed Approach to Collecting Pell Graduation Rates

Students entering schools as first-time full-time, first-time part-time, non-first-time full-time, and non-first-time part-time experience different enrollment and completion trajectories,² and providing a separate metric for each group is critical to producing fair and meaningful measures. *Yet the Department's proposal would ask colleges to report on all of these students grouped together, counter to virtually every other student outcome measure.* Grouping those students together severely limits one's

¹ U.S. Department of Education. February 18, 2016. *Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019*. Federal Register Notice, Docket ID: ED-2016-ICCD-0020. <https://www.gpo.gov/fdsys/pkg/FR-2016-02-18/pdf/2016-03338.pdf>.

² Chen, J., Chiang, Y., Dundar, A., Park, E., Shapiro, D., Torres, V., & Ziskin, M. November 2012. "Completing college: A national view of student attainment rates" (Signature report no. 4). *National Student Clearinghouse Research Center*. https://nscresearchcenter.org/wp-content/uploads/NSC_Signature_Report_4.pdf.

ability to draw conclusions about differences in graduation rates between different institutions and between Pell Grant recipients and non-Pell-Grant recipients. Furthermore, measures for an aggregated group will not be comparable to other cohorts typically used in higher education.

With a combined cohort, it will be impossible to tell whether differences in graduation rates reflect actual variations in outcomes, or whether the rates simply reflect differences in attendance patterns or enrollment intensity. The below table provides an example of how combining full- and part-time students can lead to a misleading representation of an institution’s graduation rate. Compared to School B, School A has higher graduation rates for both full-time students (60% versus 58%) and part-time students (40% versus 36%). However, School B has a higher *overall* graduation rate for the full- and part-time students combined (53% versus 50%) due to having a larger share of full-time students.

	School A (50% full-time)			School B (80% full-time)		
	Completers within six years	Entering cohort	Graduation rate	Completers within six years	Entering cohort	Graduation rate
Full-time	60	100	60%	115	200	58%
Part-time	40	100	40%	18	50	36%
Combined	100	200	50%	133	250	53%

While these issues will limit the comparability of all schools’ rates, they will result in particularly misleading rates for schools, like community colleges, which enroll large shares of part-time students who take longer to complete.

These same issues also make comparisons between Pell and non-Pell students difficult to interpret, because Pell recipients and non-recipients attend part-time and transfer at different rates.³

Furthermore, the combined cohort deviates from current practices in the field, and the measures for an aggregated group will not be comparable to other cohorts typically used in higher education. For example:

- a. *Complete College America (CCA)* collects Pell graduation rates for nine separate cohorts – certificate, associate, and bachelor's-seeking crossed with first-time full-time (FTFT), first-time part-time (FTPT), and transfers-in (full- and part-time combined).⁴
- b. *The Student Achievement Measure (SAM)* calculates student outcomes separately for FTFT and transfer full-time students in their bachelor’s model. They also include optional

³ First-time students who receive Pell Grants are more likely to enroll full-time and transfer than first-time students who don’t receive Pell Grants. Seventy-five percent of first-time students in 2003-04 who received Pell Grants at some point before 2009 began as exclusively full-time, compared to 62% of students who never received Pell Grants. Additionally, 35% of first-time students in 2003-04 who received Pell Grants at some point before 2009 had transferred to a different institution during that six-year period, compared to 29% of students who never received Pell Grants. Calculations by TICAS on data from the U.S. Department of Education, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-Up (BPS:04-09).

⁴ Complete College America. 2015. *Complete College America common college completion metrics technical guide* last updated April 23, 2015. <http://completecollege.org/wp-content/uploads/2014/11/2014-Metrics-Technical-Guide-Final-04022014.pdf>.

BA-seeking cohorts for FTPT and transfer-in part-time students.⁵ While SAM does not currently disaggregate by Pell status, it does set a clear precedent of reporting outcomes separately for cohorts defined by attendance intensity and previous college experience. SAM will also be adding the capability for reporting Pell student outcomes as a sub-cohort to existing models in Fall 2016.⁶

- c. *Statutory requirements* for disclosures by colleges pertain to the graduation rate of certificate/degree-seeking full-time undergraduate students, and are required by law to be disaggregated by gender and race/ethnicity as well as by Pell receipt, receipt of subsidized Stafford loans but not Pell, and neither subsidized loans nor Pell.⁷ Based on this disclosure requirement, The Education Trust's "The Pell Partnership" research calculates Pell graduation rates using a FTFT cohort.⁸

Three Recommendations for Collecting Data on Pell Grant Recipient Outcomes

1. *Require colleges to report Pell recipient outcome measures with student cohorts disaggregated.* We strongly recommend disaggregating the Pell graduation outcomes by the four established OM subgroups, rather than as a new aggregate cohort that combines all four subgroups. This will correct the major shortcoming of the current proposal, and ensure measures of graduation outcomes for Pell students that can accurately inform students and their families, as well as researchers, advocates, and policymakers, about how well institutions serve low-income students.

We also recommend that BA-granting institutions be required to disaggregate the reported outcomes by BA-seeking and non-BA-seeking students. The OM section currently does not require colleges to report on outcomes disaggregated by award. As described in our prior comments,⁹ combining all award levels makes it difficult to derive 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. Furthermore, four-year colleges already break out BA-seekers and non-BA-seekers in the GRS component of IPEDS, so these institutions already have experience created these cohorts, minimizing the additional burden of reporting this level of detail.

2. *Consistent with the current proposal, include all students who ever received Pell over the course of the measurement period.* Pell Grant recipients can be identified using more or less inclusive definitions. A Pell cohort can be defined most narrowly as students who receive the grant during their first year enrolled ("Pell-at entry"), or most broadly as students who ever receive the grant during the entire measurement period ("Pell-ever"). We support the Department's proposal to use a "Pell-ever" cohort, which ensures that outcome measures reported are inclusive of all Pell

⁵ Student Achievement Measure. 2014. *Methodology for calculating the bachelor's degree-seeking cohort metric*, updated August 20, 2014. <http://bit.ly/1TXPx5r>.

⁶ Hinds, T. & Keller, C., email communication to IHEP from Association of Public & Land-grant Universities (APLU), March 29, 2016.

⁷ 20 USC 1092(a)(1). <http://1.usa.gov/1QdTGLx>.

⁸ Nichols, A. 2015. *The Pell Partnership: Ensuring a Shared Responsibility for Low-Income Student Success*. <https://edtrust.org/resource/pellgradrates/>.

⁹ TICAS. 2014. *Comments on TRP45 Outcomes Measures*. http://ticas.org/sites/default/files/pub_files/TICAS_comments_on_TRP45_Outcomes_Measures.pdf.

students. Due to issues such as failure to file the FAFSA each year or being deemed temporarily ineligible under Satisfactory Academic Progress rules, some students may receive Pell in some years but not others, despite being low income during the entire eight-year period covered by OM. Other students may be low income for part of the measurement period but not all of it. Using a Pell-ever cohort ensures that all such students are included, making it a more robust proxy of low-income status than a Pell-at-entry cohort. Other groups engaged in voluntary reporting initiatives also recognize the inclusivity of a Pell-ever cohort.¹⁰

Based on our analysis, if the Department were to define Pell students as only those who received the grant in their first year, about a quarter of Pell recipients would be excluded from the Pell cohort. Exclusions of Pell students would be concentrated at two-year institutions and among students attending less than full-time, who are less likely to receive Pell in their first year.¹¹ The Postsecondary Data Collaborative also identified a very similar share of Pell Grant recipients who would be excluded using a Pell-at-entry cohort.

In addition to its inclusiveness, a Pell-ever cohort is more consistent with other measures; for example, the Voluntary Framework for Accountability defines Pell recipients using a Pell-ever cohort.¹²

3. *Consistent with the current proposal, collect outcomes on more than just first-time full-time students.* The Department's proposal to collect these data as part of the Outcome Measures (OM) survey, as opposed to the Graduation Rate Survey (GRS) is appropriate. Including non-first-time and non-full-time students in the Pell cohort, as the OM survey allows but GRS does not, will ensure that these nationally collected data cover all undergraduates, and is in line with shifts in the higher education community generally towards data collection that better encompasses the diversity of students' paths and experiences. Using an FTFT cohort would exclude 42% of entering students who receive Pell Grants. At community colleges, almost half (48%) of entering Pell Grant recipients would be excluded from a FTFT cohort.¹³

Finally, we wish to note our concern that the Federal Register notice suggests requiring these new data as a means "to assess the effectiveness of this large federal investment to undergraduate students."¹⁴ The Pell Grant program is our nation's most valuable investment in higher education, making college

¹⁰ The Education Trust. May 2012. *Replenishing Opportunity in America: The 2012 midterm report of public higher education systems in the Access to Success initiative (technical appendix)*. <http://bit.ly/1TXQ7QG>.

¹¹ Overall, almost a quarter (23%) of Pell Grant recipients do not receive a Pell Grant during their first year of college. Among Pell Grant recipients attending two-year institutions, 29% do not receive their first Pell Grant until after their first year. Additionally, Pell Grant recipients who start off attending college exclusively part-time are less likely to receive a Pell Grant during their first year than those starting college exclusively full-time (57% and 81%, respectively). Calculations by TICAS on data from the U.S. Department of Education, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-up (BPS:04/09). Figures reflect undergraduate students enrolling in college for the first time in 2003-04 who received Pell Grants at some point during the six years after enrolling. Attendance intensity and institution type reflect students' attendance during their first year.

¹² American Association of Community Colleges. November 2015. *Voluntary Framework of Accountability metrics manual version 4.0*. <http://vfa.aacc.nche.edu/Documents/VFAMetricsManual.pdf>.

¹³ Calculations by TICAS on fall enrollment and student financial aid data for 2013-14 from the U.S. Department of Education, Integrated Postsecondary Education Data System (IPEDS). Note that students at community colleges have the largest number of students who would be excluded from a FTFT cohort, compared to other institution types.

¹⁴ Supporting statement part A, 60-day Federal Register notice (February 19, 2016) for Docket ED-2016-ICCD-0020: Agency information collection activities; Comment request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019, 81 Fed. Reg. 8181 (February 18, 2016).

possible for nearly eight million Americans each year,¹⁵ and many rigorous studies on the effectiveness of Pell Grants and other need-based grant aid have found them to facilitate students' enrollment, persistence, and completion.¹⁶ It would be a mistake to interpret Pell Grant recipient graduation rates as evidence to the contrary, particularly given the substantial decline in the grant's purchasing power over the last 40 years.¹⁷

Thank you for your thoughtful consideration of our feedback and recommendations. If you have any questions, please feel free to contact me at lahlman@ticas.org or 202-854-0232.

Sincerely,



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¹⁵ U.S. Department of Education. 2016. *Fiscal Year 2017 Budget Request: Student Financial Assistance*. <http://1.usa.gov/1LxtZ7Y>. Page O-24.

¹⁶ For more information, see TICAS. 2016. "Pell Grants Help Keep College Affordable for Millions of Americans." http://ticas.org/sites/default/files/pub_files/overall_pell_one-pager.pdf.

¹⁷ The \$5,815 maximum Pell Grant in 2016-17 is expected to cover less than 30 percent of the cost of public four-year college. College costs are defined here as average total in-state tuition, fees, room, and board. Projected college costs for 2016-17 were estimated by using the average annual increase in costs over the most recent five years. Calculations by TICAS using College Board, 2015, *Trends in College Pricing 2015*, Table 2, <http://bit.ly/1Pyv2sJ>, and U.S. Department of Education, Pell Grant payment and disbursement schedules <http://ifap.ed.gov/dpclatters/GEN1601.html>.