

January 17, 2017

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Re: Docket ID ED–2016–ICCD–0127

Dear Ms. Mullan:

These comments are in response to the November 15, 2016 Federal Register notice requesting new clearance for the U.S. Department of Education’s Integrated Postsecondary Education Data System (IPEDS) 2017-2020 data collection, and soliciting comments on changes to two survey components.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 have long recommended that IPEDS collect Pell Grant recipient outcome measures to ensure that students and families have access to comprehensive and reliable completion data that can inform their choices about enrolling in institutions that serve students well. We thank the Department of Education (the Department) for committing to collecting these vital data, and for being responsive to concerns that we and other postsecondary data advocates outlined regarding the collection method initially proposed.² We strongly support the currently proposed changes to the Outcome Measure (OM) survey, including the addition of four Pell Grant sub-cohorts for each of the four OM cohorts, which will provide fair and meaningful measures of Pell and non-Pell recipient outcomes. We also support the current proposal to report outcomes disaggregated by the highest award earned, which will enable meaningful comparisons between colleges with different mixes of awards conferred.

In these comments, we reiterate our support of these changes to the OM survey, and offer additional recommendations for improving IPEDS data collection in order to provide students, families, researchers, and policymakers with essential postsecondary data. These recommendations include:

1. *Include ED-calculated columns for “percent of adjusted cohort who received an award from your institution” in the 4- and 6-year award status tables.*
2. *Allow schools to report room and board expenses for students living with family.*

¹ U.S. Department of Education. November 15, 2016. *Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019*. Federal Register Notice, Docket ID: ED–2016–ICCD–0127. <http://bit.ly/2il1hRt>.

² See TICAS. 2016. *Comments on IPEDS Pell Graduation Rate Proposal*. <http://bit.ly/2jvJ0TA>; and Postsecondary Data Collaborative. 2016. *Comment on Revised Proposal for IPEDS 2016–2019 Data Collection*. <http://bit.ly/2i5TJRQ>.

3. *Collect cumulative debt at graduation for completers of undergraduate certificates, associates degrees, and bachelor's degrees.*
4. *Collect annual non-federal loan data for all undergraduates.*
5. *Collect the number of loan-eligible students to facilitate calculation of institutional participation rate index (PRI)*
6. *Annually update and publish a common school identifier crosswalk*

Comments on Outcome Measure (OM) Survey

We greatly appreciated the opportunity to participate in the August 2016 Technical Review Panel (TRP) and continue to highlight the importance of collecting outcome data for Pell Grant recipients in the OM survey in order to capture more than just first-time full-time (FTFT) students. 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 both across and within institutions. Having accessible and reliable completion data for Pell Grant recipients will also help students and families make more informed choices about enrolling in institutions that serve all students well. NCES' decision to begin collecting graduation rates for Pell Grant recipients in the 2016-17 IPEDS Graduation Rates (GR) survey is a positive step, but because many Pell Grant recipients are not FTFT, it is essential to also collect Pell Grant recipient outcomes more comprehensively in the OM survey. We strongly support the Department's proposal to do so.

In particular, we thank the Department for revising its initial proposal. As detailed in our prior comments,³ having institutions report on Pell Grant subcohorts for each of the four OM cohorts (first-time full-time, first-time part-time, non-first-time full-time, and non-first-time part-time), as the revised proposal does, will facilitate meaningful comparisons of outcomes for Pell Grant recipients across institutions, as well as comparisons of outcomes between Pell and non-Pell Grant recipients.

We also applaud the Department for proposing to disaggregate outcomes by highest award. As we outlined in December 2014 comments responding to the "Report and Suggestions from IPEDS Technical Review Panel #45: Outcome Measures," combining all award levels hinders accurate comparisons of outcomes at colleges with different mixes of awards by level because completion rates vary by program length.⁴ We support the Department's proposal to collect outcomes by highest award, and suggest that BA-granting institutions report BA attainment among students pursuing a BA either in addition to or as an alternative if the current proposal is determined to be infeasible. This would help ensure that nationally collected data can speak to the rate at which these students achieve their specific educational goals. The reporting requirement would furthermore represent minimal burden because four-year colleges already break out BA-seekers and non-BA-seekers in the GR survey.

1. *Include ED-calculated columns for "percent of adjusted cohort who received an award from your institution" in the four- and six-year award status tables.*

³ TICAS. 2016. *Comments on IPEDS Pell Graduation Rate Proposal*.
http://ticas.org/sites/default/files/pub_files/ticas_comments_on_ipeds_pell_grad_rate_proposal.pdf;

⁴ TICAS. 2014. *Comments on "Report and Suggestions from IPEDS Technical Review Panel #45: Outcome Measures"*.
http://ticas.org/sites/default/files/pub_files/TICAS_comments_on_TRP45_Outcomes_Measures.pdf

The current OM survey includes a calculated column for the percent of the adjusted cohort who received an award from the institution in the six-year award status table. The proposed OM survey includes this column in only the eight-year status table. We recommend including this column in all three award status tables (4-year, 6-year, and 8-year) to provide consistent data for all time periods. Because this column is calculated by the Department, its inclusion in all three award status tables would not represent any additional institutional burden.

Recommended Changes to Other IPEDS Data Elements

2. Allow schools to report room and board expenses for students living with family.

College affordability and attainment continues to be an issue of paramount importance for students, families, and policymakers, so it is critical that national data is able to provide comprehensive information on cost of attendance and student debt. Institutions report in IPEDS their estimated full cost of attendance (COA), which includes personal and living expenses in addition to tuition and fees. These data are used in consumer-facing tools such as the College Scorecard and in the Financial Aid Shopping Sheet, and the estimates help students and families make informed choices about where to attend college and how to pay for it.

Unfortunately, current limitations in IPEDS' cost of attendance data collection can result in an understatement of the true cost some students are likely to face at a given college. The Student Financial Aid (SFA) survey allows schools to report estimated room and board expenses separately for students living on campus and off campus without family, but does not provide an option for reporting these expenses if a student lives off campus with family. Our research identified many colleges that recognize that students living with family incur room and board expenses, and factor these costs into their own COA estimates. Schools are, however, unable to report these estimated expenses for such students in the SFA survey. As a result, federal data on college costs can understate what colleges estimate students' costs to be – in some cases by many thousands of dollars.⁵ In order to ensure that federal data contain accurate estimates of the full cost of attending a college, the SFA survey should allow schools to report estimated room and board expenses for students living with families. This change in IPEDS, along with corresponding changes to the federal Net Price Calculator (NPC) template⁶ could also allow colleges to include those room and board expenses in their online net price calculator tools as well.

3. Collect cumulative debt at graduation for completers of undergraduate certificates, associates degrees, and bachelor's degrees.

Improvement to existing data on cumulative debt at graduation is urgently needed for consumers, colleges, and policymakers. Although it is helpful that the College Scorecard and Financial Aid Shopping Sheet include median cumulative federal debt at graduation, those data are not disaggregated by award

⁵ For an analysis of the differences in estimated costs, see TICAS. 2016. *Federal Cost Data for Student Living at Home Are Significantly Understated*. <http://www.ticas.org/blog/federal-cost-data-students-living-home-are-significantly-understated>.

⁶ Information about the Department's NPC template can be found at https://nces.ed.gov/ipeds/section/net_price_calculator#Template.

level and do not include private loans. Many colleges voluntarily report cumulative federal and non-federal debt data using the annual Common Data Set (CDS). However, these schools represent a fraction of colleges in the country – slightly over half of public and nonprofit four-year colleges, very few for-profit colleges, and no two-year colleges.⁷ Additionally, the cumulative debt data from the CDS are limited to bachelor’s degree recipients.

In the absence of private loan data being tracked through NSLDS, we strongly recommend that IPEDS immediately start collecting data on cumulative debt at graduation that includes both federal and non-federal loans for completers of undergraduate certificates, associate's degrees, and bachelor's degrees. To minimize reporting burden and ensure fair comparisons, we suggest applying the CDS definitions already established for questions on this topic to certificates and associate’s degrees as well as bachelor’s degrees.⁸ As such, the cohort for reporting cumulative debt at graduation would include all students who started as first-time undergraduates at the reporting institution and earned a certificate or degree (excluding transfer-in students). Colleges would only report loans borrowed at their institution, not debt accumulated at other institutions.

For each award level (certificate, associate’s degree, bachelor’s degree), IPEDS should collect and report the following data points:

- Number of students in graduating class (the cohort as defined above)
- Number of graduating students with any debt, federal debt, and non-federal debt
- Total debt of the graduating class, broken out by all debt, federal debt only, and non-federal debt only

These data would allow the National Center for Education Statistics (NCES) or other stakeholders to calculate the percent of graduates with debt and the average debt per borrower. Minimally, these data should be collected for all student loans, federal student loans, and non-federal student loans separately. Ideally, non-federal loans should be further divided by source (states, colleges, and banks/lenders), as is done in the CDS.

4. Collect annual non-federal loan data for all undergraduates.

As student debt levels continue to rise, it is increasingly important that nationally collected data reflect not just borrowing amounts, but also the *type* of loans students borrow. Private (non-federal) loans are one of the riskiest ways to pay for college, generally lacking the flexible repayment plans and other consumer protections built into federal student loans. IPEDS collects data on annual federal and private loan borrowing for first-time, full-time undergraduates’, but only collects data on annual federal loan borrowing for all undergraduates.

⁷ For more information about CDS data, see TICAS. 2016. *Student Debt and the Class of 2015*. http://ticas.org/sites/default/files/pub_files/classof2015.pdf.

⁸ The 2016-17 Common Data Set includes cumulative debt questions in H4 and H5: http://www.commondataset.org/docs/2016-2017/CDS_2016-2017.pdf.

Recognizing that a significant proportion of undergraduates are not captured in a first-time full-time cohort, and that private loan originations and outstanding balances continue to grow,⁹ consumers and policymakers have an urgent need for timely data about private student loan borrowing among all undergraduate students. Furthermore, almost all private loans are certified by institutions, so schools already have these data.¹⁰ In the absence of the Department including private loans in NSLDS, it is imperative that IPEDS collect these data.

5. *Collect the number of loan-eligible students to facilitate calculation of institutional Participation Rate Index (PRI)*

Colleges facing Title IV eligibility loss due to high cohort default rates (CDRs) can appeal to the Department using the Participation Rate Index (PRI) in order to avoid sanctions based on a CDR that represents a very small share of students who borrow federal loans. This PRI appeal allowance reflects the understanding that CDRs may not be representative indicators of institutional quality at colleges where these rates – which only describe the share of borrowers who default – reflect outcomes for only a small share of students. As such, it serves an integral function in maintaining the integrity of the current Title IV eligibility system and protecting schools from undeserved sanctions. Unfortunately, the opacity of the PRI appeals process leads to confusion, and many schools that would be eligible for an appeal are unaware of the option and unnecessarily withdraw from the federal student loan program to avoid sanction, cutting off students from the safest way to borrow.

As part of the PRI appeals process, the college needs to calculate the total number of students eligible for federal student loans, the total number receiving such loans, the participation rate (number receiving divided by number eligible) and the PRI (participation rate times CDR). Importantly, the data required to calculate the participation rate and the PRI are not available publicly. Although IPEDS collects the number of undergraduates receiving federal student loans, it does not include the total number of *students* receiving federal student loans. In addition, for most colleges, the SFA cohort for these data is fall enrollees only, not all enrollees during a full 12-month award year.

We recommend that IPEDS collect and report the following data points to facilitate the calculation of PRIs:

- Number of students receiving federal Direct Loans (undergraduates and graduate students, full 12-month award year)
- Number of regular students who were enrolled at the institution on at least a half-time basis during any part of the award year

Collecting these two additional data points in IPEDS would give the Department, policymakers, and other stakeholders important context for distinguishing between schools where CDRs are more and less meaningful indicators of institutional quality. It would also help colleges better understand their risk of sanctions, and colleges would still be able to appeal CDR sanctions by following the required process.

⁹ Feshback et al. 2016. *The MeasureOne Private Student Loan Report Q3 2016*. Accessed via <https://www.measureone.com/psl.php> on December 19, 2016.

¹⁰ Ibid.

6. *Annually update and publish a common school identifier crosswalk*

The OPEID/UNITID crosswalks released with the College Scorecard¹¹ provide an invaluable resource that helps users link data from federal datasets that use different school identifiers. These crosswalks should be statistically reviewed for accuracy, regularly updated, and published on the IPEDS Data Center to ensure this resource is both reliable and made available each year.

Thank you for the opportunity to share our support and recommendations for the collection of these important data. If you have any questions, please feel free to contact me at lahlman@ticas.org or 202-854-0232.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lindsay Ahlman', is centered on a light gray rectangular background.

Lindsay Ahlman
Senior Policy Analyst

¹¹ Crosswalk files are included in the full data download option on <https://collegescorecard.ed.gov/data/>.