

July 20, 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,

We write in response to the June 24, 2016 Federal Register notice soliciting comments on the revised proposal for changes to the U.S. Department of Education's (the Department'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 greatly appreciate the Department's detailed response to our [April 18, 2016 comments](#) on its proposal to collect data in IPEDS on Pell Grant recipients' college outcomes by adding a single cohort of Pell Grant recipients in the Outcome Measure (OM) survey. In these previous comments, we outlined our concerns that this approach to reporting outcomes for Pell Grant recipients would blur distinctions between student groups, restricting the ability to make comparisons of Pell recipients' outcomes across colleges, as well as comparisons between Pell and non-Pell recipients.

We are encouraged by the Department's revision to its initial proposal, which adds a Pell recipient cohort to the Graduation Rate (GR) survey. While the graduation rate of Pell Grant recipients in this section would be limited to first-time full-time (FTFT) students, it would be comparable to other commonly used graduation rates, and would avoid combining outcomes for students with different enrollment and attendance patterns.

We also thank the Department for its commitment to improve reporting of Pell Grant recipient outcomes in the OM survey. Reporting completion outcomes for more than just FTFT Pell Grant recipients, as OM allows, ensures that these nationally collected data cover all undergraduates,² and aligns with shifts in the higher education community toward improving postsecondary data collection to better encompass the diversity of students' paths and experiences. We continue to recommend that the four established OM cohorts be disaggregated by Pell status, in place of adding a fifth Pell cohort that combines students of different enrollment and attendance patterns. **Reporting Pell student outcomes separately for first-time full-time, first-time part-time, non-first-time full-time, and non-first-time part-time students would provide fair and meaningful measures of Pell and non-Pell recipient outcomes, whereas reporting one combined cohort would not.**

¹ U.S. Department of Education. June 24, 2016. *Comment Request; Integrated Postsecondary Education Data System (IPEDS) 2016-2019*. Federal Register Notice, Docket ID: ED-2016-ICCD-0020. <https://www.regulations.gov/document?D=ED-2016-ICCD-0020-0068>

² 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. 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 institutions types.

We appreciate the opportunity to participate in the Technical Review Panel next month to discuss including four disaggregated OM cohorts by Pell status, along with other ways to improve OM reporting such as capturing all students who ever received Pell during the measurement period, and disaggregating reported outcomes for BA-seeking and non-BA-seeking students.³

We thank the Department for its continued commitment to collecting meaningful and reliable data on Pell Grant recipient outcomes. 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
The Institute for College Access & Success (TICAS)

³ See our April 2016 comments for more details about these proposals. TICAS. April 18, 2016. Comments on proposed changes to the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS) data collection. http://ticas.org/sites/default/files/pub_files/ticas_comments_on_ipeds_pell_grad_rate_proposal.pdf.