

October 12, 2016

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 submitted in response to the “Report and Suggestions from IPEDS Technical Review Panel #50: Outcome Measures 2017-18: New Data Collection Considerations.” 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 appreciated the opportunity to participate in the August Technical Review Panel (TRP). We write to underscore our comments in those discussions on the importance of collecting outcome data for Pell Grant recipients in the IPEDS Outcome Measure (OM) survey in order to capture more than just first-time full-time students, and to express our strong support for the report’s recommendation to report Pell subgroup cohorts for each of the four existing OM cohorts. As an alternative to proposed changes to report data by award level, we also recommend requiring bachelor’s degree-granting institutions to break out bachelor’s degree seekers who attained a bachelor’s degree.

Report Pell Grant recipient outcomes in the OM survey, using the four established OM cohorts disaggregated by Pell status.

NCES’ decision to begin collecting graduation rates for Pell Grant recipients in the 2016-17 IPEDS Graduation Rates (GR) survey is a positive step towards being able to report these vital data. However, while the resulting measure would be comparable to commonly used IPEDS graduation rates, it would suffer from the same major weakness of being limited to first-time full-time (FTFT) students. Because many Pell Grant recipients are not FTFT students, it is essential to also collect Pell Grant recipient outcomes more comprehensively in the OM survey. A measure based on a 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.¹ 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 fundamental national data on outcomes for Pell Grant recipients include all undergraduates.

We also strongly agree with the fourth proposed change in the TRP summary – to break out Pell Grant recipients from each of the four existing OM cohorts (first-time full-time, first-time part-time, non-first-time full-time, and non-first-time part-time students), rather than grouping Pell Grant recipients together in a

¹ 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.

single cohort that combines students with different enrollment and attendance patterns. Using a combined cohort would make it 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.² These issues would limit the ability to compare rates across schools, and result in particularly misleading rates for schools, like community colleges, which enroll large shares of part-time students who take longer to complete.

Require BA-granting institutions to break out only bachelor's degree seekers who attained a bachelor's degree.

The OM survey currently does not require colleges to report on outcomes disaggregated by award. As described in prior TICAS public comments,³ 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 (BAs) 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.

As an alternative to proposals to report data by *all* awards sought and/or *all* awards attained, we propose a more limited disaggregation by award level. In the OM survey, BA-granting institutions should break out the BA-seekers who attained a BA. Four-year colleges already break out BA-seekers and non-BA-seekers in the GRS component of IPEDS, so these institutions already have experience creating these cohorts, minimizing the additional burden of reporting this level of detail. Although it is helpful to measure whether students achieved any credential during a given period of enrollment, it is important to distinguish whether students attained the award they were aiming for. Given the relatively limited burden of breaking out BA-seekers, we recommend starting with that cohort for the 2017-18 reporting year, and exploring additional breakouts in the future.

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

Sincerely,



Lindsay Ahlman
Senior Policy Analyst
The Institute for College Access & Success (TICAS)

² See our prior comments for an example of how combining cohorts would limit comparability. TICAS. 2016. [TICAS Comments on IPEDS Pell Graduation Rate Proposal](#). PP. 1-2.

³ TICAS. 2014. *Comments on TRP45 Outcomes Measures*.

http://ticas.org/sites/default/files/pub_files/TICAS_comments_on_TRP45_Outcomes_Measures.pdf.