



April 18, 2016

Mr. Richard Reeves
IPEDS Program Director
National Center for Education Statistics
Potomac Center Plaza
550 12th Street SW, Room 4134
Washington, DC 20202

Dear Mr. Reeves:

This letter is in response to the proposed addition of a Pell Grant recipient cohort to the Outcome Measures (OM) Survey component of the Integrated Postsecondary Education Data System (IPEDS).

It is encouraging that the Department of Education (ED) is taking steps to include indicators of the postsecondary success of Pell recipients in IPEDS. Many in the higher education community, including the PostsecData Collaborative, have advocated for the addition of Pell graduation rates to IPEDS.ⁱ For example, a 2008 IPEDS Technical Review Panel (TRP) recommended establishing a Pell Grant sub-cohort in the Graduate Rate Survey.ⁱⁱ Additionally, the Committee on Measures of Student Success (CMSS) called for ED to direct the National Center for Education Statistics (NCES) to add Pell graduation rates to IPEDS and convene a TRP to determine how to do so.ⁱⁱⁱ

These data would provide students, policymakers, institutions, and policy researchers with information on how outcomes for low-income students vary across institutions and how they compare with the outcomes of more well-resourced classmates. While Sec. 488(a)(3) of the Higher Education Opportunity Act of 2008 (HEOA) requires institutions to disclose graduation rates disaggregated based on Pell status,^{iv} research has shown inadequate compliance with this disclosure requirement.^v Furthermore, as a disclosure requirement, these data are difficult to collect and use in a comprehensive way because gathering them requires contacting thousands of individual colleges.^{vi} APLU strongly supports the addition of low-income student outcomes to IPEDS.

APLU supports the majority of recommendations outlined in a separate letter from the Postsecondary Data Collaborative (PostsecData) and is one of the signatories. As stated in that letter, there are several alternative methods for including Pell outcomes data with the IPEDS collection and each are preferred by different members of the higher education community. **APLU strongly recommends incorporating a Pell cohort into the GRS over the other alternatives that involve additions or changes within the OM survey** - as described in the Federal Register or as described within the PostsecData letter. APLU recommends the addition to the GRS for several reasons.

- It is consistent with the current HEOA disclosure requirements and the recommendation of TRP #24.^{vii}
- It would be comparable to pre-existing and commonly used graduation rates, including those disaggregating by race and gender. The comparability is very important to provide an anchor and a context for the reporting of graduation rates for a new subgroup, particularly one as high-profile as the Pell cohort.
- It would be a more meaningful and understandable metric for most audiences and help to minimize inaccurate interpretations and comparisons. The proposed OM Pell cohort combining varying

attendance and enrollment patterns would make it difficult, if not impossible, to draw any valid conclusions about true differences in outcomes for Pell grant student as the mix of student types and enrollments vary widely across institutions.

- It would minimize burden by aligning with the HEOA disclosure requirement that institutions are already required to calculate.
- It will also minimize burden by not introducing another cohort to the relatively new OM survey, which is already causing confusion and additional work for keyholders.

While the addition of a FTFT Pell cohort is not an ideal solution as first-time, full-time students are not representative of the entire student body at many institutions, APLU believes it is a solution that appropriately balances the reporting of meaningful information with the institutional burden required.

To further ensure these data are as useful as possible, APLU joins with the PostsecData Collaborative in making the following recommendations on appropriate ways to use the results and proposed technical specifications to improve their overall quality.

- A. *Use Pell graduation rates to measure success for low-income students, not the effectiveness of the Pell Grant program*
- B. *Make the results more useful by improving how the Pell cohort and outcome data are specified*
 1. Do not combine students of varying attendance and enrollment patterns into one Pell cohort
 2. Define Pell recipients as those students who receive Pell when they initially enroll in college (Pell at entry), not those who receive Pell at any point while enrolled in college (Pell ever)
 3. Require all institutions to report outcomes for Pell students, not only degree-granting institutions
 4. Report Pell outcomes after 100, 150, and 200 percent of program time instead of (or in addition to) after 6 and 8 years
 5. Disaggregate cohorts by credential sought

Each of these recommendations is discussed in detail below.

A. ***Use Pell graduation rates to measure success for low-income students, not the effectiveness of the Pell Grant program***

In light of the widespread support for additional data on how low-income students are served by their respective institutions, NCES' proposal is a positive one. When available, Pell (and non-Pell) graduation rate data can help identify institutions that are serving low-income students well and closing gaps between them and their higher income classmates, while also shining a light on campuses that could serve low-income students better.^{viii} Pell receipt serves as a useful proxy for income status, illuminating trends in outcomes by economic status.^{ix}

However, proper use of these data is key, as Pell graduation rates are not an appropriate measure of effectiveness for the Pell Grant program as the Federal Register notice suggests when referring to the new measure as a means "to assess the effectiveness of this large federal investment to undergraduate students."^x Pell Grants make college possible for nearly eight million Americans who rely on the grants to attend and complete college. Many improvements to the Pell program are necessary to increase its effectiveness, including increasing the grant's purchasing power beyond the less than 30 percent of four-year public college costs that the maximum grant currently covers.^{xi} If institution-level Pell graduation rates prove to be lower than rates for non-Pell students, those findings should not be interpreted as a failure of the program itself, but rather spur institutional improvement efforts and further investment in the Pell program. We cannot stress enough how important it is to maintain focus on the use of a Pell receipt indicator as a proxy to determine how low-income students are served at the postsecondary level.

B. ***Make the results more useful by improving how the Pell cohort and outcome data are specified***

Members of the higher education community who have advocated for and plan on using Pell outcome data have serious concerns regarding the proposed implementation of this new measure and expect significant barriers to robust and beneficial analysis of the data as specified. To remedy these challenges, we propose the following:

1. **Do not combine students of varying attendance and enrollment patterns into one Pell cohort.** The proposed approach of using an aggregated cohort raises the most serious concerns. If implemented as proposed, the Pell OM cohort would mix widely varying student populations into one, irrespective of attendance intensity and enrollment status. First-time, transfer, full-time, and part-time students experience different enrollment and completion trajectories,^{xii} and, when combined, create a heterogeneous cohort. It will therefore be impossible to tell whether the varying Pell graduation rates across colleges are a result of true differences in outcomes for Pell students or because of meaningful differences in the types of students institutions enroll and attendance patterns of those enrolled.

This heterogeneity is also problematic when comparing Pell outcomes with non-Pell outcomes because Pell recipients and non-recipients attend part-time and transfer at different rates.^{xiii} As a result, the distribution of attendance and enrollment patterns within the Pell cohort will be different from the distribution within the non-Pell cohort, making comparisons between the two cohorts difficult to interpret. Additionally, the aggregated cohort seems to be in conflict with TRP #24's recommendation, which called for a first-time full-time (FTFT) Pell sub-cohort as well as a first-time part-time (FTPT) Pell sub-cohort if a part-time cohort were to be established.^{xiv}

Furthermore, the results will not be comparable to other cohorts typically used in higher education. In fact, the aggregated cohort deviates from current field practice. For example:

- a. *Complete College America (CCA)* collects Pell graduation rates for nine separate cohorts – certificate, associate, and bachelor's-seeking crossed with FTFT, FTPT, and transfer (full- and part-time combined).^{xv}
 - 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 bachelor's cohorts for first-time part-time and transfer part-time students.^{xvi} In the associate/certificate model, they collect two cohorts: full-time students (including first-time and transfer) and part-time students (including first-time and transfer).^{xvii} While SAM does not currently disaggregate for Pell status, it does set a clear precedent of reporting outcomes separately for cohorts defined by attendance and enrollment status. SAM will also be adding the capability for reporting Pell student outcomes as a sub-cohort to existing models in fall 2016.^{xviii}
 - c. *Statutory requirements* for disclosure pertain to the completion/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 Pell receipt, receipt of subsidized Stafford loans but not Pell, and neither the specified loans nor Pell.^{xix} Based on this disclosure requirement, The Education Trust's "The Pell Partnership" research calculates Pell graduation rates using a FTFT cohort.^{xx}
2. **Define Pell recipients as those who receive Pell at entry, not those who receive Pell ever.** Voluntary data initiatives have led the way in defining and collecting Pell graduation rates, and several define Pell receipt based on status at entry for cohort-based measures, like graduation rates.^{xxi} We recommend defining Pell at entry for outcome data in IPEDS, as well. While identifying Pell recipients at entry will

omit an estimated 11 percent of students per cohort who become low-income after their first year or apply for aid and are accurately captured as low-income later in their college careers,^{xxii} the benefits of defining Pell at entry outweigh this downside:

- a. *Timeliness*: Defining Pell ever requires waiting for the full measurement time period (8 years) to elapse before reporting outcome information, whereas defining Pell at entry allows for earlier reporting as the cohort progresses. While the OM survey only requires retrospective reporting at the 8-year mark, it could evolve in the future to include more frequent, earlier reporting. Even if not reported to IPEDS more frequently, institutions likely will want to check on the progress of their Pell cohort at earlier intervals, providing them with more real-time data to inform institutional policies, rather than waiting 8 years for retrospective data. These interim checks will be difficult if Pell is not defined at cohort entry.
- b. *Consistency*: Other elements of OM and GRS cohorts (attendance status, enrollment intensity, race/ethnicity, gender) all are defined at entry, so defining Pell at entry would be consistent with other IPEDS cohort-based elements. Furthermore, all dependent students who remain enrolled for 8 years will age out of dependency status while enrolled, making them more likely to become Pell-eligible in later years. While these students are legitimately Pell-eligible, combining them with students who qualified for Pell for the majority of their college enrollment muddies the proxy and builds inconsistencies into the measurement.
- c. *TRP recommendations*: TRP #24 recommends using Pell at entry, saying “those cohort members who received Pell dollars (disbursements) during the official student financial aid year for the year in which the cohort is established” should be counted as Pell recipients.^{xxiii}
- d. *Clarity*: Defining Pell ever raises questions about how to classify students who receive Pell Grants only in year 7 or 8 because their Pell status would be different at the 6-year and 8-year outcome points. Including year 7/8 Pell recipients in the Pell cohort for 6-year outcomes seems imprecise, but excluding them at year 6 and including them at year 8 is inconsistent and creates comparability problems.
- e. *Insubstantial value added*: Defining Pell ever does not produce substantially different graduation rates than defining Pell at entry. Among students who receive Pell at entry, 35 percent attain a credential at their first institution, compared with 34 percent of students who received Pell ever.^{xxiv} This trend of similar results holds across institution types, with the largest difference occurring at private non-profit four-year institutions (49 percent completion for Pell at entry, compared with 51 percent for Pell ever). Students who receive Pell ever are slightly (5.5 percentage points) more likely to transfer than students who only receive Pell at entry, perhaps because they receive Pell at the subsequent institution.^{xxv} Given the relatively small difference in results alongside the substantial benefits outlined above, Pell at entry is a better option.

To account for the estimated one-quarter of Pell recipients per cohort who receive Pell at some point but not in their first year,^{xxvi} the IPEDS Completions survey could disaggregate the number of completers by whether they received Pell ever. Completer counts are more suited to a Pell ever proxy because the counts are retrospective by nature. Furthermore, defining Pell at entry for cohort measures and Pell ever for completer counts would mirror the methodology implemented by CCA and Access to Success (A2S).^{xxvii}

3. **Require all institutions to report Pell outcomes, not only degree-granting institutions.** Only degree-granting institutions are required to complete the OM survey, so by including a Pell cohort in the OM

survey but not the GRS, the field will still miss outcome information for approximately 436,000 Pell recipients attending nearly 2,700 non-degree-granting institutions.^{xxviii}

4. **Report Pell outcomes after 100, 150, and 200 percent of program time instead of after 6 and 8 years.** Reporting outcomes only at 6 and 8 years makes the proposed metric very retrospective, with more lag in reporting, and would only provide data on community college students at 300 and 400 percent of time. While these extended timeframes may be useful for community colleges, they should be additional options, rather than replacements for the shorter timeframes required in HEA. The 6- and 8-year timeframes are built into the OM survey, so if Pell completion outcomes were to remain in the OM rather than the GRS then this recommendation would require changes to the survey itself. For more detailed recommendations on improving the OM survey, please refer to PostsecData's December 2014 comments.
5. **Disaggregate cohorts by credential sought.** Meaningful examination of student outcomes necessitates an understanding of student intentions. Several voluntary data initiatives (including SAM, CCA, and A2S) disaggregate cohorts accordingly.^{xxix} Additionally, institutions that offer multiple credentials already are required to report the graduation rates of bachelor's degree-seekers separately from other credential-seekers, and must further report the program length for each federal aid recipient to the National Student Loan Data System (NSLDS).^{xxx} With these reporting measures in place, institutions should already be prepared to report credential sought.

APLU values the Department's efforts to improve postsecondary data systems, supports efforts to collect more comprehensive data on student outcomes, and commends NCES for taking this step in what is certainly the right direction. Ultimately, APLU supports the development of a student-level data collection to streamline collection and reporting, allowing for the most useful metrics to be calculated with less concern about reporting burden. APLU also strongly recommends replacing the GRS metrics with a model similar to the Student Achievement Measure (SAM).

Thank you for the opportunity to comment on the proposed changes as well as for thoughtful consideration of our feedback and recommendations. If you have any questions, please do not hesitate to call or email me, ckeller@aplu.org or 202-478-6043.

Sincerely,

Christine M Keller
Vice President, Research & Policy Analysis
Executive Director, Student Achievement Measure

ⁱ Engle, J., Huelsman, M., Long, A.A., & Voight, M. (March 2014), Mapping the postsecondary data domain: problems and possibilities, *Institute for Higher Education Policy*, retrieved from http://www.ihep.org/sites/default/files/uploads/docs/pubs/mapping_the_postsecondary_data_domain_-_main_report_revised.pdf; *Institute for Higher Education Policy* (November 2013), IHEP comments in response to technical request for information on the Postsecondary Institutional Rating System (PIRS), retrieved from <http://www.ihep.org/press/opinions-and-statements/ihep-comments-response-technical-request-information-postsecondary>; *Institute for Higher Education Policy* (December 2014), PostsecData comments on IPEDS Outcome Measures Technical Review Panel, retrieved from

http://www.ihep.org/sites/default/files/uploads/docs/press/postsecdata_comments_on_ipeds_outcome_measures_trp_dec_2014.pdf

ⁱⁱ *RTI International*, Report and suggestions from IPEDS Technical Review Panel #24: Collecting GRS data for part-time students and Pell Grant recipients (accessed 2016 March 11), retrieved from https://edsurveys.rti.org/IPEDS_TRP_DOCS/prod/documents/TRP_24_Summary_final.pdf

ⁱⁱⁱ *U.S. Department of Education* (December 2011), Committee on Measures of Student Success: Report to Secretary of Education Arne Duncan, retrieved from <http://www2.ed.gov/about/bdscomm/list/cmss-committee-report-final.pdf>

^{iv} Higher Education Opportunity Act, Public Law 110-315, 110th Congress (2008).

^v Carey, K. & Kelly, A.P. (November 2011), The truth behind higher education disclosure laws, *American Enterprise Institute*, retrieved from http://www.aei.org/wp-content/uploads/2011/11/-truthhigherdisclosurelaws_185621335060.pdf

^{vi} Nichols, A.H. (September 2015), The Pell partnership: Ensuring a shared responsibility for low-income student success, *The Education Trust*, retrieved from https://edtrust.org/wp-content/uploads/2014/09/ThePellPartnership_EdTrust_20152.pdf

^{vii} Higher Education Opportunity Act, Public Law 110-315, 110th Congress (2008); *RTI International*, Report and suggestions from IPEDS Technical Review Panel #24.

^{viii} Nichols.

^{ix} While Pell receipt is a frequently used proxy for low-income students, it is not perfect. Some students, particularly at low-cost institutions like community colleges, would qualify for Pell, but do not receive it simply because they do not apply for federal financial aid. When using Pell as a proxy for income status, these students will be counted as non-Pell, even though they are low-income. However, Pell remains the best available proxy.

^x 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).

^{xi} College costs are defined here as average total in-state tuition, fees, room, and board at public four-year colleges.

Projected college costs for 2016-17 were estimated by using the average annual increase in costs over the most recent five years. Figures for Pell Grant maximum amount are for 2016-17. Calculations by The Institute for College Access & Success using *College Board* (2015), Trends in college pricing 2015 (Table 2), retrieved from <http://bit.ly/1Pyv2sJ> and *U.S.*

Department of Education, Pell Grant payment and disbursement schedules, retrieved from <http://ifap.ed.gov/dpccletters/GEN1601.html>

^{xii} 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*, retrieved from https://nscresearchcenter.org/wp-content/uploads/NSC_Signature_Report_4.pdf

^{xiii} On average, 14 percent of Pell Grant recipients in 2003-04 began as part-time students in that same year, while 24.1 percent of non-recipients began part-time. An average 25.9 percent of 2003-04 Pell recipients who started that year would later transfer, compared with 31.6 percent of non-recipients. IHEP analysis of U.S. Department of Education, National Center for Education Statistics, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-up (BPS:04/09), computation by NCES PowerStats Version 1.0 on March 15, 2016, variables used were ATTEND, PROUT6Y, & PELL04, weight variable was WTB000.

^{xiv} *RTI International*, Report and suggestions from IPEDS Technical Review Panel #24.

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

^{xvi} *The Student Achievement Measure*, SAM methodology for calculating the bachelor's degree-seeking cohort metric, updated August 20, 2014, retrieved from <https://s3.amazonaws.com/studentachievementmeasure/SAM+Permanent+Links/SAM+Bachelors+Model+Methodology.pdf>

^{xvii} *The Student Achievement Measure*, SAM methodology for calculating the associate degree- and certificate-seeking cohort metric, July 1, 2013, retrieved from <https://s3.amazonaws.com/studentachievementmeasure/SAM+Permanent+Links/SAM+Associate+%26+Certificate+Model+Methodology.pdf>

^{xviii} Hinds, T. & Keller, C., email communication from Association of Public & Land-grant Universities (APLU), March 29, 2016.

^{xix} 20 USC 1092(a)(1), accessed 2016 March 16, retrieved from <https://www.gpo.gov/fdsys/pkg/USCODE-2014-title20/pdf/USCODE-2014-title20-chap28-subchapIV-partF-sec1092.pdf>

^{xx} Nichols.

^{xxi} Complete College America and Access to Success both count Pell recipients as those who received Pell at entry for their graduation rate measures, while the Voluntary Framework for Accountability identifies Pell recipients as those who have ever received Pell. A2S and CCA also disaggregate the total number of degrees conferred by Pell ever. *Complete College America*, Complete College America common college completion metrics technical guide; *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), retrieved from http://edtrust.org/wp-content/uploads/2013/10/A2S_2012_Appendix.pdf; *Voluntary Framework of Accountability* (November 2015), Voluntary Framework of Accountability metrics manual version 4.0, retrieved from <http://vfa.aacc.nche.edu/Documents/VFAMetricsManual.pdf>

^{xxii} IHEP analysis indicates 11 percent of the BPS:04/09 cohort did not receive Pell at entry in 2003-04 but did receive Pell at some point, by 2009. Computation by NCES PowerStats Version 1.0 on March 29, 2016, variables used were PELLCU09 & PELL04, weight variable was WTBO00.

^{xxiii} *RTI International*, Report and suggestions from IPEDS Technical Review Panel #24.

^{xxiv} IHEP analysis of BPS:04/09, computation by NCES PowerStats Version 1.0 on March 17, 2016, variables used were PELL04, PELLCU09, PROUT6Y, & FSECTOR, weight variable was WTBO00.

^{xxv} On average, 26.2 percent of students who received Pell at entry in 2003-04 later transferred. Students who were counted as having received Pell at any point through 2009 had transferred from first institution at a rate of 31.7 percent overall. IHEP analysis of BPS:04/09, computation by NCES PowerStats Version 1.0 on April 5, 2016, variables used were PELL04, PELLCU09, & PROUT6Y, weight variable was WTBO00.

^{xxvi} Of those who did not receive Pell at entry in 2003-04, 17.1 percent would later receive Pell while 82.9 percent would not. Of those who received Pell by 2009, 76.5 percent received Pell at entry in 2003-04 and 23.5 percent did not. IHEP analysis of BPS:04/09, computation by NCES PowerStats Version 1.0 on March 29, 2016, variables used were PELLCU09 & PELL04, weight variable was WTBO00.

^{xxvii} *Complete College America*, Complete College America common college completion metrics technical guide; *The Education Trust* (May 2012).

^{xxviii} IHEP analysis of IPEDS 2014, undergraduate students receiving Pell Grants (14) at non-degree-granting institutions, IPEDS DataCenter on March 18, 2016.

^{xxix} *The Student Achievement Measure*, SAM methodology for calculating the bachelor's degree-seeking cohort metric; *The Student Achievement Measure*, SAM methodology for calculating the associate degree- and certificate-seeking cohort metric; *Complete College America*, Complete College America common college completion metrics technical guide; *The Education Trust* (May 2012).

^{xxx} *U.S. Department of Education Office of Federal Student Aid* (October 2015), National Student Loan Data System enrollment reporting guide, retrieved from <http://ifap.ed.gov/nsldsmaterials/attachments/NewNSLDSenrollmentReportingGuide.pdf>