July 22, 2016

Kate Mullan  
Acting Director of the Information Collection Clearance Division  
U.S. Department of Education  
400 Maryland Avenue SW., LBJ, Room 2E-343  
Washington, DC 20202-4537

Dear Ms. Mullan:

This letter is submitted on behalf of the 22 undersigned members of the Postsecondary Data Collaborative (PostsecData), in response to the revised proposal for the Integrated Postsecondary Education Data System (IPEDS) 2016–2019 collection. PostsecData comprises organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

We appreciate your detailed response to our April 18, 2016 recommendation letter and are very encouraged by the newest iteration of the proposal. The addition of the "Pell recipients" and "Non-Pell recipients who receive subsidized Stafford loans" cohorts in the Graduation Rate (GR) survey will provide data comparable to commonly used graduation rates. The proposed calculation also should manage reporting burden, as it aligns with the Higher Education Opportunity Act of 2008 disclosure requirements.

For the Outcome Measures (OM) survey, we look forward to the discussion and outcomes of the August 2016 Technical Review Panel, and offer our organizations as resources to participate in that meeting. Supplementing the existing OM cohorts with four matching Pell recipient cohorts, in lieu of a fifth cohort that combines students of different enrollment and attendance patterns, could allow for a more meaningful and nuanced analysis of the data. Collecting graduation rates in this way with OM could also provide a more complete understanding of outcomes for all Pell recipients, beyond the first time, full-time students covered in the GR survey.

We value the Department of Education's efforts to improve postsecondary data systems and to collect more comprehensive data on student outcomes—especially for low-income students. This revised proposal reinforces the commitment by the National Center for Education Statistics to collect better data on the outcomes of millions of low-income students and the institutions that serve them.

Thank you for the opportunity to comment on the revised IPEDS proposal as well as for thoughtful consideration of our previous feedback and recommendations. If you have any questions, please do not hesitate to call or email Jamey Rorison at jrorison@ihep.org or (202) 861-8244.

Sincerely,

Association for Career and Technical Education  
Association of Public & Land-grant Universities  
California Competes  
Campaign for College Opportunity  
Complete College America  
Data Quality Campaign  
Education Commission of the States  
George Washington Institute of Public Policy