

December 8, 2014

Ms. Janice Kelly-Reid
IPEDS Project Director
RTI International
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P.O. Box 12194
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Dear Ms. Kelly-Reid:

This letter is in response to RTI's *Report and Suggestions from IPEDS Technical Review Panel 45: Outcome Measures*, published as a summary of the September 22-23 Technical Review Panel (TRP) hosted by RTI International. The Institute for Higher Education Policy (IHEP) is a nonpartisan, nonprofit organization committed to promoting access to and success in higher education for all students, particularly those who have traditionally been underserved by our postsecondary system. We produce innovative and timely research to inform both policy and practice and recognize the crucial role that quality data play in informing policy, research, institutional improvement, and consumer choice. We are joined in this letter by partner organizations working as part of the PostsecData Collaborative to promote the availability and use of high-quality postsecondary data to improve student success.

The Department of Education rightfully has taken on the challenge of identifying student outcome measures that more accurately reflect student movement through and within the postsecondary system. Measures of progression and completion are particularly important in the absence of strong data on quality that measures student learning. The Integrated Postsecondary Education Data System's (IPEDS) Graduation Rate component (GR) serves an important purpose by measuring the likelihood that first-time, full-time students graduate at their first institution of enrollment. However, it does not capture the full diversity of today's college students, nor does it reflect the variety of outcomes that students experience. A robust set of Outcome Measures (OMs) can fill these data gaps to provide a better understanding of student success, informing policy, consumer choice, and institutional improvement efforts.

To manage reporting burden and produce clear, consistent information, these Outcome Measures should align with the existing GR component and the IPEDS retention rate. Such alignment will reduce the need for institutions to specify multiple similar, yet different cohorts and outcomes, allowing the OM survey to replace the current GR and retention rate requirements. Table 1 and the discussion below summarize our proposed adjustments to the OM survey. In short, these recommendations:

- Align progress and outcome reporting across IPEDS components to produce clear, consistent results in one survey, reducing the burden associated with multiple surveys.
- Capture all students, all institutions, and all outcomes to illuminate student pathways more clearly and give institutions credit for the full breadth of student outcomes.
- Produce timelier outcome data to maintain relevance in discussions of policy and practice.
- Provide necessary demographic disaggregates to evaluate equity in student outcomes.

These recommendations are grounded in research on voluntary data initiatives focused on postsecondary student success. For a more detailed analysis and recommended improvements to IPEDS, see IHEP's 2014 report, [Mapping the Postsecondary Data Domain: Problems and Possibilities](#) (and the associated [technical report](#)).

Proposed Outcome Measures

The Outcome Measures survey should build off the existing GR component, making expansions and changes to the specification of **COHORTS**, **OUTCOMES**, **TIMING**, **DISAGGREGATES**, and **COVERAGE** as described below. The TRP report states that the OM component is separate and different from the GR in cohort specification, time-to-degree, and outcomes. While these differences do exist between the current GR and OM components, they do not necessarily *need* to exist. Closer alignment between the two types of measures will produce higher quality, less confusing data. Consistency in specifying and defining data measures also will help manage reporting burden. The types of measures discussed below have been field tested for feasibility for at least five years through voluntary initiatives like Complete College America, Access to Success, the Student Achievement Measure (SAM), and the American Association of Community Colleges' (AACC) Voluntary Framework of Accountability (VFA).¹

COHORTS: Cohorts should be specified as shown in Table 1. These specifications are similar to the current OMs in that they create separate cohorts based on enrollment status (first-time, transfer²) and attendance intensity (full-time at entry, part-time at entry³). However, they improve upon the current measures in two key ways:

- *Disaggregating cohorts by credential sought:* Obtaining an adequate understanding of student outcomes requires a base-level reporting of student intentions, so cohorts should be defined separately based on the level of credential sought by the student. Institutions that offer credentials of multiple levels should specify and report on separate cohorts for each credential level offered. The TRP report states that some panelists thought that “disaggregating the entering cohort by award-level intent (e.g., certificate, associate’s, bachelor’s) would add substantial burden [and/or] pose serious challenges to institutions.” However, as also noted in the TRP report (page 11), institutions already are required to disaggregate students by program level. First, institutions that offer multiple credential levels must distinguish bachelor’s-seekers from other degree/certificate-seekers in the GR. Second, institutions must report each federal aid recipient’s program length to the National Student Loan Data System (NSLDS) to determine eligibility for subsidized Stafford loans.⁴ Because these requirements are in place already, institutions should have the data—or at least mechanisms in place to collect the data—to disaggregate the entering cohorts by award-level intent. While determining student intent may not be an easy task, it already is required, so aligning the OMs with these existing data collections should not add substantial *new* burden and doing so offers great value. Furthermore, several voluntary data initiatives, including the SAM, Complete College America, and Access to Success, specify

¹ *Complete College America Common College Completion Metrics Technical Guide*. Complete College America. April 2014. Retrieved from: <https://ccacollection.sheeo.org/cca/homeattach/2014%20Metrics%20Technical%20Guide%20Final%2004022014.pdf>; *Replenishing Opportunity in America Technical Appendix*. The Education Trust. May 2012. Retrieved from: http://www.edtrust.org/sites/edtrust.org/files/publications/files/A2S_2012_Appendix.pdf; *Student Achievement Measure*. Retrieved from: <http://www.studentachievementmeasure.org/resources>; *Voluntary Framework of Accountability Metrics Manual Version 3*. American Association of Community Colleges. November 2014. Retrieved from: <http://vfa.aacc.nche.edu/Documents/VFAMetricsManual.pdf>

² Transfer here is not intended to measure the actual transfer of credits, but rather to identify students who were previously enrolled elsewhere, regardless of credit transfer. The term “transfer” is used for simplicity. The transfer cohorts could include students who transfer into that cohort from the same institution or from a different institution. For example, a student who starts first time in an associate’s program, does not earn an associate’s degree, but does earn a bachelor’s degree at the same institution would be a non-completer/transfer in the first-time associate’s cohort and a completer in the bachelor’s-seeking transfer cohort. The Education Trust/NASH’s Access to Success initiative uses this methodology for counting within-institution transfers. If it is necessary to reduce complexity from the proposal presented here, this option could be eliminated. However, it does provide value in allowing institutions to get credit in the Outcome Measures for students who complete a credential after a within-institution transfer.

³ Specifying attendance status at entry into the cohort allows for early cohort specification and timelier reporting.

⁴ Pub. L. No. 112-141 limits student eligibility for subsidized Stafford loans to “150 percent of the published length of the educational program in which the student is enrolled.” Retrieved from: <http://www.gpo.gov/fdsys/pkg/PLAW-112publ141/pdf/PLAW-112publ141.pdf>. Data reporting details are summarized in: *NSLDS Enrollment Reporting Webinar #5*. Federal Student Aid. July 30 and 31, 2014. Retrieved from: <http://ifap.ed.gov/presentations/attachments/150DSSLWebinar5EnrollmentReporting073014.pdf>.

separate cohorts based on credential-seeking status. To maximize data quality, efforts should be made to provide institutions with advice on best practices for identifying student intent.

- *Use full-year cohorts for all institutions:* Currently, depending on whether they are term or program reporters, institutions specify either a Fall cohort or a full-year (12-month) cohort for GR and OM reporting, creating inconsistencies and comparability challenges across institutions. Today's students do not necessarily start on a traditional Fall schedule, and as more and more innovative educational approaches emerge, one can only expect non-traditional start times to increase. In fact, at the 4,338 fall-reporting institutions in 2013-14, 5.8 million undergraduates—one out of every four—were omitted from Fall enrollment counts, but captured in the full-year counts.⁵ In response to current and anticipated student enrollment patterns and to promote comparable outcomes data, the OM cohorts *at all institutions* should be based on full-year, as opposed to Fall, enrollments. While this change will lead to some inconsistencies in analyses that compare rates over time, the benefits of the change outweigh the loss of precise year-to-year comparability.

OUTCOMES: Outcomes should encompass a comprehensive set of possible results that students in a cohort could experience over a given time period. The specific outcomes shown in Table 1, and described in detail after the table, were derived based on a review of voluntary data collections such as the VFA, SAM, Complete College America, and Access to Success. They aim to balance the need for specificity and completeness with the desire to maintain simplicity.

⁵ IHEP analysis of IPEDS 2013 Fall Enrollment and 12-Month Unduplicated Headcount Enrollment data.

Table 1: Proposed Outcome Measures

Cohort (based on 12-month enrollments)		Number of students in cohort	Outcomes: Number of students who...							
			Completed credential sought			Did not complete credential sought ⁶				
			Transfer ⁷ to a longer program (A)	Transfer to a program with the same or shorter length (B)	Did not transfer (C)	Transfer to a longer program (D)	Transfer to a program with the same or shorter length (E)	Did not transfer & not still enrolled (F)	Still enrolled (G)	Status unknown (H)
First-Time Entering										
Bachelor's-seeking	Full-time									
	Part-time									
Associate's-seeking	Full-time									
	Part-time									
Certificate-seeking	Full-time									
	Part-time									
Non-First-Time Entering ⁸										
Bachelor's-seeking	Full-time									
	Part-time									
Associate's-seeking	Full-time									
	Part-time									
Certificate-seeking	Full-time									
	Part-time									

⁶ An optional category (I) could be added to this framework to capture students who did not complete the credential sought, but did complete a different credential at the same institution, giving institutions credit for—for example—a student who enters a bachelor's program, but completes an associate's degree instead.

⁷ "Transfer" here is intended to mean "subsequently enrolled," not to imply that actual credit transfer needs to be tracked.

⁸ If students who transfer to a longer program at the same institution are counted as transfers and then moved into a transfer cohort to continue tracking their progress, as described in footnote 2, then some students in the non-first-time cohorts would not be "entering students" at that institution, but would be "entering students" in that program level and "continuing students" in the institution.

The outcomes listed in Table 1 aim to include all potential student outcomes, which can be combined in a number of different iterations to meet different needs. The outcomes are specified as follows:

- Completers of credential sought:⁹
 - A = Transfer to a longer program (e.g. certificate to associate’s or bachelor’s program or associate’s to bachelor’s program within the same institution or another institution)
 - B = Transfer to a program with the same or shorter length (e.g. bachelor’s to bachelor’s program, associate to certificate program, or bachelor’s to associate program within the same institution or another institution)
 - C = Did not transfer to another program level¹⁰/institution
- Non-Completers of credential sought:
 - D = Transfer to a longer program (e.g. certificate to associate’s or bachelor’s program or associate’s to bachelor’s program within the same institution or another institution)
 - E = Transfer to a program with the same or shorter length (e.g. bachelor’s to bachelor’s program, associate to certificate program, or bachelor’s to associate program within the same institution or another institution)
 - F = Did not transfer to another program level/institution and not still enrolled
 - G = Still enrolled at the initial program level and institution
 - H = Status Unknown
 - I (optional) = Completed credential other than the one initially sought (e.g. bachelor’s-seeker completed an associate’s degree)

These outcome specifications offer several benefits. First, they capture student outcomes in a comprehensive, but not duplicative way, ensuring all outcomes are counted. Also, they avoid forcing “trumping” decision when determining how to count students who, for example, attained an associate degree *and* transferred. Instead of having to select which outcome to count, both are counted separately; this is not the case in the current Outcome Measures.

These outcomes, in combination with the disaggregation of cohorts by credential sought, as discussed in more detail in the “COHORTS” section above, offer a solution to the “concern that reporting aggregate awards would limit the utility of the data for institutions that offer multiple award levels,” as stated in the TRP report. This concern is valid and highlights a key flaw of the current OMs, which report the total number of students in the cohort receiving an award without disaggregating by the type of award sought or awarded. The outcomes in this letter’s proposal address that concern by requiring reporting on whether the type of credential awarded matches the type of credential *sought* by the student.

Just as aggregating award levels limits data utility, so does aggregating transfer levels. Transfer from an associate’s program to a bachelor’s program is a different outcome than transfer from one associate’s program or one bachelor’s program to another, which is different still from transferring from a bachelor’s program to an associate’s program. Disaggregating transfer by level of receiving institution greatly increases the usefulness of the data without greatly

⁹ As with the current Student-Right-To-Know specifications, institutions with transfer as a part of their mission may count students who complete a transfer preparatory program as a completer under this proposed model as well.

¹⁰ Program levels are defined here as certificates, associate’s degrees, and bachelor’s degrees. A student can be considered a transfer if she moves between institutions *or* if she moves between program levels at the same institution, but not if she moves between programs of the same level. For example, a student who changes from pursuing a bachelor’s in nursing to a bachelor’s in engineering is not a transfer, but a student who moves from an associate’s in nursing to a bachelor’s in nursing program is a transfer, even within the same institution. This approach would allow an institution to get credit for a student who starts in an associate’s program and transfers to a baccalaureate program even if that transfer occurs within the same institution. However, as noted earlier, this nuance could be dropped to reduce complexity.

increasing burden because in the process of determining *if* a student transferred, the sending institution will likely determine *where* they transferred to. For simplicity, this proposal suggests grouping together students who transfer to a program of the same length with those who transfer to a program of a shorter length, while separating students who transfer to a program of a longer length. However, these categories could be split further to measure: (1) transfer to a program of longer length, (2) transfer to a program of the same length, and (3) transfer to a program of a shorter length. These three categories would produce more detailed and useful data, but in an effort to manage reporting burden, this proposal identifies only the two categories. It should be noted, though, that some experts consulted for this work recommend using all three categories.

Finally, this framework was designed to align closely with the current GR. In fact, using the framework in Table 1, the current IPEDS graduation rates for the bachelor's-seeking cohort and the other degree/certificate-seeking cohort could be calculated as A + B + C divided by the number of students in the first-time, full-time cohort.¹¹ This letter's proposal would not require changes to the current GR reporting framework for these cohorts, but rather, these Outcome Measures could *replace* those GR components.

The outcomes described here also offer parallels to SAM and VFA, with the primary difference being the treatment of transfer. While SAM's bachelor's model reports students who transfer and subsequently complete separately from students who transfer and remain enrolled at the receiving institution, the proposal here combines those two outcomes, measuring transfer, but not distinguishing subsequent completion. However, the separate cohorts for transfer students will ensure all students and all outcomes are captured.

- Graduated: Original Institution = A + B + C + I
- Enrolled: Original Institution = G
- Transferred & Graduated: Other Institution + Transferred & Enrolled: Other Institution (Bachelor's-seeking SAM) = D + E
- Transferred: Other Institution (Associate's- or Certificate-seeking SAM) = D + E
- Status Unknown = H¹²

¹¹ Currently, IPEDS collects data for three different graduation rates as part of the GR component for four-year institutions. These rates include a bachelor's-seeking cohort, an other degree/certificate-seeking cohort, and an overall cohort. Without the addition of category (I), the proposal presented here would allow replication of the bachelor's and other degree/certificate-seeking cohorts, but not the overall cohort because the overall graduation rate in IPEDS counts as completers students who complete credentials other than the credential sought (e.g. A student enrolled in a bachelor's program who completes an associate's degree would count as a completer in the overall rate, but not in the bachelor's-seeking rate). While this overall rate often is used to meet Student-Right-to-Know (SRTK) requirements, the legislative language may be flexible enough to allow the more refined rates—based on type of credential sought—to meet the statutory requirement. The SRTK legislation requires graduation rates to count students as completers if “within 150 percent of the normal time for completion of or graduation from a program, the student has completed or graduated from the program, or enrolled in any program of an eligible institution for which the prior program provides substantial preparation.” (P.L. 101-542) Alternately, category (I) could be added to capture students who did not complete the credential sought, but did complete a different credential.

¹² The “status unknown” category in SAM and VFA draws from all students in the cohort, whereas this proposal limits it to students who did not complete the credential sought, under the assumption that whether a student completed a credential at an institution should not be unknown to that institution.

TIMING: Each of the outcomes in Table 1 could be reported at years 1, 2, 3, 4, 6, and 8. For consistency, years 5 and 7 could be added to this reporting framework as well. Alternately, to reduce burden, years 2 and 3 could be dropped for bachelor’s cohorts and years 6 and 8 could be dropped for associate’s and certificate cohorts.¹³ The remaining years (1, 4, 6, and 8 for bachelor’s cohorts and 1, 2, 3, and 4 for associate’s and certificate cohorts) correspond with retention rates, 100 percent, 150 percent, and 200 percent of normal time to graduation for two and four-year programs and would represent a vast improvement over the 6 and 8 year timeframes in the current OMs. Six and eight years simply are too long to wait to learn about student outcomes, particularly in programs of two years or less.

This option represents a slight modification to Options 1 and 2 presented in the TRP report because it adds ‘year 1,’ which we suggest adding *in place of* the current retention rate data. However, year 1 (retention rate) outcome measures should be reported at the end of year 1 (e.g. 2006 cohort reports year 1 outcomes in 2007). This near real-time reporting will provide institutions with a quick assessment of student progress, rather than waiting four years to see results, as would be required if year 1 were added to “Starting year A” in either Option 1 or 2. Furthermore, in comparing Options 1 and 2, Option 2 better meets the need for timely data by providing 6 year outcomes at the end of the 6th year as opposed to delaying reporting until the end of year 8.

DISAGGREGATES: As discussed in the report, “there is a demonstrated need for having demographics” in the OMs. To meet this need, we strongly support disaggregating the outcome measures by at least:

- *Race/ethnicity* – Use current IPEDS definitions
- *Gender* – Use current IPEDS definitions
- *Financial aid category* – At least three categories: Pell Grant recipient; Subsidized Stafford, non-Pell Grant recipient; Students receiving neither Pell Grants, nor subsidized Stafford loans. Institutions currently are required to disclose graduation rates using these disaggregates, so incorporating them into IPEDS should not add substantial additional burden.

To reduce reporting burden, race/ethnicity and gender could be disaggregated separately, but not crossed with each other.

COVERAGE: The current OMs include only degree-granting institutions, omitting approximately 814,000 undergraduates at over 2,500 non-degree-granting, primarily postsecondary, Title IV-receiving institutions of higher education.¹⁴ To capture all outcomes for all students at all institutions, non-degree-granting institutions should be required to report outcome measures as well. Including non-degree-granting institutions is particularly important for student information purposes because certificate-seeking students are likely to be choosing between programs offered by non-degree-granting and degree-granting institutions in the same field and geographic area.

¹³ Two-year institutions sometimes cite longer time-to-completion for their students and may prefer to maintain the 6 and 8 year timeframes in the model.

¹⁴ IHEP analysis of IPEDS 2012-13 12-Month Enrollment and Institutional Characteristics data.

As noted below, these comments are supported by 14 organizations committed to high-quality postsecondary data. We appreciate the Department's efforts to improve postsecondary data systems and strongly support efforts to compile better, more complete data on student outcomes. Thank you for the opportunity to comment on these crucial changes to IPEDS and for thoughtful consideration of our recommendations. If you have any questions, please do not hesitate to e-mail or call Mamie Voight (mvoight@ihep.org, 202-587-4967)

Sincerely,

Center for Law and Social Policy (CLASP)
Complete College America
Data Quality Campaign (DQC)
The Education Trust
HCM Strategists
Institute for Higher Education Policy (IHEP)
National Association of System Heads (NASH)
National Center for Higher Education Management Systems (NCHEMS)
National College Access Network (NCAN)
New America
State Higher Education Executive Officers Association (SHEEO)
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Young Invincibles