## Report and Suggestions from IPEDS Technical Review Panel #37 Selected Outcomes of the Advisory Committee on Measures of Student Success

SUMMARY: To broaden the coverage of student graduation rate data and improve the quality of data reported to IPEDS, the Technical Review Panel suggests collecting outcome information on a first-time, part-time degree/certificate-seeking undergraduate cohort and clarifying the definition of degree/certificate-seeking. Comments from interested parties are due to Janice Kelly-Reid, IPEDS Project Director at RTI International, at <a href="mailto:ipedsTRPcomment@rti.org">ipedsTRPcomment@rti.org</a> by May 29, 2012.

On February 28–29, RTI International, the contractor for the Integrated Postsecondary Education Data System (IPEDS) web-based data collection system, convened a meeting of the IPEDS Technical Review Panel (TRP) in Washington, DC. Meetings of the IPEDS TRP are conducted by RTI to identify technical improvements to the IPEDS data collection and dissemination, as well as to foster communication with data providers and users. The purpose of this meeting was to solicit input from the postsecondary education community regarding selected outcomes of the U.S. Department of Education's Advisory Committee on Measures of Student Success. The panel consisted of 48 individuals representing data providers and users including the federal government, state governments, institutions, association representatives, and others.

### Overview

The *Higher Education Opportunity Act* of 2008 (HEOA) authorized the creation of the Advisory Committee on Measures of Student Success (Committee) to advise the Secretary of Education on how to assist 2-year degree-granting institutions of higher education in meeting graduation rate disclosure requirements outlined in the *Higher Education Act* of 1965, as amended (HEA). The Committee was charged with the following tasks:

- Developing recommendations regarding the accurate calculation and disclosure of graduation rates of entering degree/certificate-seeking, full-time undergraduate students by 2-year degree-granting institutions
- Recommending additional or alternative measures of student success that are comparable alternatives to the graduation rates of entering full-time degree-seeking undergraduate students, taking into account the mission and role of 2-year degree-granting institutions

After more than a year of deliberations, the Committee submitted its final report to the Secretary in December 2011.

Based on its findings, the Committee developed a series of recommendations for actions that the U.S. Department of Education and the higher education community should implement in both the short and long term.

## Committee recommendations:

- Broaden coverage of student graduation rate data to reflect the diverse student populations at 2-year institutions
- Improve collection of student progression and completion data
- Improve technical guidance to institutions in meeting statutory disclosure requirements
- Encourage institutions to disclose comparable data on employment outcomes and provide incentives for institutions to share promising practices on measuring learning

While the recommendations address concerns about how student success is measured at 2-year institutions, the Committee noted that its recommendations should be considered and implemented by 4-year institutions as well.

In response to the Committee's recommendations, RTI convened the IPEDS TRP to discuss improvements to the current IPEDS survey forms and possible additions to the IPEDS data collection that could help provide a more complete picture of student success at 2-year and 4-year institutions through measures collected in IPEDS. Specifically, the panel discussed the following topics:

- clarifying the definition of a degree/certificate-seeking student for the purposes of IPEDS reporting;
- establishing a cohort of part-time, first-time degree/certificate-seeking students for reporting graduation rate data to IPEDS; and
- defining progression and completion for degree/certificate-seeking cohorts.

Discussions resulted in suggested clarifications for the definition of a degree/certificate-seeking student and three suggested options for reporting progression and completions metrics for part-time, first-time degree/certificate-seeking students to IPEDS. Committee recommendations not addressed by TRP 37 may be explored in greater detail at a future meeting of the IPEDS TRP, if necessary.

# Discussion Item #1: Clarifying the Definition of a Degree/Certificate-Seeking Student for the Purposes of IPEDS Reporting

## **Background**

Under the *Student Right to Know and Campus Security Act* of 1990 (SRK), institutions must disclose to current and prospective students the rate at which full-time, first-time degree/certificate-seeking undergraduate students complete their academic programs. To help institutions comply with this disclosure requirement, the IPEDS Graduation Rate (GR) component tracks cohorts of full-time, first-time degree/certificate-seeking undergraduates and their completion status at 100% and 150% of normal time to completion at postsecondary institutions. The IPEDS 200% Graduation Rate component (GR200) was added when the HEOA required that institutions report the completion status of these students at 200% of normal time.

## Current definition of a degree/certificate-seeking student for IPEDS reporting purposes:

Students enrolled in courses for credit and recognized by the institution as seeking a degree, certificate, or other formal award. High school students also enrolled in postsecondary courses for credit are not considered degree/certificate-seeking.

—IPEDS Glossary

The Committee recommended that clarifications be made to the definition of a degree/certificate-seeking student for the purposes of IPEDS reporting. Varying patterns of student enrollment, students' own uncertainty about their educational goals, and differences in program requirements for degrees and certificates can make identifying a degree-seeking student challenging for institutions. For example, degree/certificate-seeking status may be established based on students' stated intent at the time of admission, students' initial course-taking patterns in their first term or year of enrollment, or on students' collective course-taking patterns over the entire history of their enrollment.

The Committee recommended that the panel consider the following student characteristics or behaviors to determine which, if any, could help to more clearly define a degree/certificate-seeking student for IPEDS:

- received any type of federal financial aid, regardless of what courses they took at any time; or any state or locally based financial aid with an eligibility requirement that the student be enrolled in a degree, certificate, or transfer-seeking program;
- ever attempted, at any point in their entire academic history, any degree-applicable, transferrable, or remedial math, reading, or writing course (not including ESL);
- ever attempted any course identified as being part of an advanced vocational, occupational, or apprenticeship sequence that leads directly to a degree or certificate; or
- was identified by the institution as clearly being enrolled in a program or sequence that leads to a degree, certificate, or transfer to a 4-year institution (such as being officially enrolled in or having declared to be in a particular program or major after having received matriculation or advisement services).

Because clarifications made to the definition of degree/certificate-seeking students for IPEDS reporting purposes might be adopted by other entities, the panel was asked to consider potential implications while developing its technical suggestions.

### **Discussion**

The panel agreed that clarifying the definition of a degree/certificate-seeking student is important to help institutions correctly establish a cohort, while also improving the quality and comparability of the data. Under the current definition for IPEDS reporting, identifying students "recognized" by the institution as seeking a degree, certificate, or other formal award is subject to some interpretation. A student's intent may not be known to the institution as students do not always declare their intent to earn a degree or certificate at the beginning of their enrollment and may not do so until they complete. In the absence of known intent, institutions and states use a variety of methods to identify students who meet the IPEDS definition for degree/certificate-seeking status, and therefore the panel deemed it necessary to clarify the definition.

To address the Committee's recommendation, the panel examined existing policies and programs that require students to be degree/certificate-seeking in order to be eligible for participation. For example, students must be enrolled in a degree or certificate program to meet the minimum eligibility requirements to receive federal financial aid. When applying for federal financial aid students sign a Statement of Educational Purpose indicating their intent to pursue a degree or certificate. Additionally, some state and local government financial aid programs require that recipients are enrolled in a degree or certificate program. Finally, foreign students applying for a U.S. student visa must be accepted and approved for enrollment in a degree or certificate program before obtaining a visa. The panel suggested that the IPEDS definition of "degree/certificate-seeking" should be clarified to explicitly state that students with these characteristics are considered to be degree/certificate-seeking.

The panel was hesitant to include language about course-taking patterns in the definition of a degree/certificate-seeking student. The panel acknowledged that requiring this level of detail for determining a degree/certificate-seeking student would be challenging and substantially increase the reporting burden for institutions. The panel also considered an approach of interpreting students' intent to seek a degree or certificate based on a minimum number of credits attempted in their first year. However, the panel did not come to an agreement regarding an appropriate threshold and felt there were too many challenges with this approach.

The panel noted that the suggested clarifications are not exhaustive of all students who are degree/certificate-seeking, but instead prevents institutions from inadvertently excluding these students.

Definitions of a Degree/Certificate-Seeking Student for IPEDS Reporting Purposes								
Current (IPEDS Glossary)	Proposed by TRP							
Students enrolled in courses for credit and recognized by the institution as seeking a degree, certificate, or other formal award. High school students also enrolled in postsecondary courses for credit are not considered degree/certificate-seeking.	Students enrolled in courses for credit and recognized by the institution as seeking a degree, certificate, or other formal award. This includes students who:  • received any type of federal financial aid, regardless of what courses they took at any time;  • received any state or locally based financial aid with an eligibility requirement that the student be enrolled in a degree, certificate, or transferseeking program; or  • obtained a student visa to study at a U.S. postsecondary institution  High school students also enrolled in postsecondary courses for credit are not considered degree/certificate-seeking.							

## Discussion Item #2: Establishing a Cohort of Part-Time, First-Time Degree/Certificate-Seeking Students for Reporting Graduation Rate Data to IPEDS

## **Background on TRP 24**

A previous IPEDS TRP discussed collecting graduation rate data for part-time students. TRP 24, held July 9–10, 2008, discussed the feasibility of (1) establishing a part-time Graduation Rate (GR) cohort and (2) adding a Pell Grant recipient subcohort to the current GR full-time, first-time cohort. The report and suggestions were not posted for comment following the TRP meeting because NCES resources were dedicated to implementing requirements of the HEOA, which became law in August 2008, soon after the meeting was held.

Because the current language of the regulations that implement the SRK does not preclude establishing additional cohorts within the current GR model, TRP 24 discussed capturing part-time student activity within IPEDS. The panel agreed that tracking the outcomes of part-time students is important for institutions that enroll significant numbers of students on a part-time basis, but also suggested that institutions with smaller populations be exempt from reporting on such a cohort. TRP 37 was asked to review these suggestions.

#### **Discussion**

The panel agreed that in order to capture useful data related to a part-time, first-time cohort, it is first necessary to consider how part-time, degree/certificate-seeking students are identified. Each year, in the IPEDS Fall Enrollment (EF) component, institutions report the number of undergraduate students who have no prior postsecondary experience and have enrolled part-time with the intent to earn a degree, certificate, or other formal award.

As noted previously, institutions face challenges in identifying degree/certificate-seeking students. In light of this, the panel discussed a minimum threshold of credit hours attempted over an academic year to determine inclusion in the part-time cohort. However, the panel expressed concern with the integrity of a cohort established by a minimum credit threshold. Students who are degree/certificate-seeking and are enrolled part-time are eligible to receive financial aid and therefore aided students could be excluded from the cohort if they did not meet the minimum threshold established. Alternatively, a low credit threshold would exclude so few students that the value of the data would not justify the imposed burden. The panel determined that a part-time, first-time degree/certificate-seeking cohort should be defined using current IPEDS definitions, with the degree/certificate-seeking clarifications noted in earlier discussion.

Next, the panel reviewed the suggestion made by TRP 24 that institutions with a small number of part-time students be exempt from reporting to reduce reporting burden. The panel noted that institutions with part-time populations on the cusp of the threshold may be required to report graduation rates for part-time students one year but not the next; reporting on the full-time, first-time degree/certificate-seeking cohort is statutorily required regardless of the size of the full-time population; and no other portions of IPEDS are optional for institutions with small numbers of students to report. Further, institutions are already required to track the part-time, first-time cohort to report retention rates. Given the complexities of the population and potential for inconsistent reporting standards across IPEDS components, the panel suggested that all institutions report data on a part-time cohort.

## Discussion Item #3: Defining Progression and Completion for Degree/Certificate-Seeking Cohorts

## **Background**

Graduation rates reflect the percentage of students in the cohort who completed their program during the tracking period; transfer-out rates reflect the percentage of students in the cohort who transferred to another institution without completing their program. Reporting the total number of students who transfer out (without a degree or award) is required of institutions whose mission includes providing substantial preparation for students to enroll in another eligible institution without having completed their program. Institutions that do not have substantial preparation for transfer as part of their mission have the option to report such students. Per the GR instructions, institutions are required to have documentation that the student actually transferred.

The Committee found that transfer-out rates have been significantly underreported in part because institutions have limited access to the necessary data. To be able to determine whether a student has transferred, institutions need data on student enrollment at other institutions. Institutions typically use four data sources to help them determine transfers out: (1) state student unit record databases; (2) system student unit record databases; (3) the National Student Clearinghouse; and (4) institutional surveys, exit interviews, and administrative records.

The Committee recommended that institutions report to IPEDS an unduplicated count of students who achieved the following outcomes within 100, 150, and 200 percent of normal time to completion:

- a) earned an award; transferred to a 4-year institution without an award; or were substantially prepared for transfer (b + c + d + e);
- b) earned an award and did not transfer to a 4-year institution;
- c) earned an award and transferred to a 4-year institution;
- d) did not earn an award and transferred to a 4-year institution;
- e) were substantially prepared for transfer (no award, no transfer); and
- f) are still enrolled at the institution in the first term immediately following the tracking period or transferred to another 2-year institution within the tracking period.

For 2-year institutions, a student earning an award or transferring to a 4-year institution are both desired outcomes. A combined, unduplicated graduation and transfer rate would present a more complete picture of successful outcomes for 2-year institutions and more accurately reflects their mission to confer degrees and certificates and prepare students for transfer.

### **Discussion**

The regulations implementing SRK established the current method for reporting graduation rates to exclude students who transfer out without having attained a certificate or degree but who were substantially prepared by the institution for transfer to another institution. Students who transfer to another institution after being awarded a degree or certificate are not counted in this transfer-out rate. The panel agreed there is value in collecting more data on outcomes to address policy questions and provide more detailed information to prospective students and their families.

However, the panel was concerned with data limitations and the availability of data necessary to report such a rate. Institutions have limited access to data on transfers and rely on other sources for this information. The sources used to determine transfer status are not consistent across institutions, and the information available varies by institution type and sector. Many states have systems that can link student data across institutions, but if students transfer to schools in other states, the state system is unable to provide information on those students. Other sources like the National Student Clearinghouse may require membership or have fees associated with requests for data. In light of this, the panel was concerned with placing undue burden on institutions by requiring them to report data collected by other sources.

The panel was also concerned with an approach that attributes value judgments to certain outcomes (e.g., considering transfer to a 4-year institution a higher level outcome than transfer to a 2-year institution). It was noted that there is an important distinction between program level and institution level transfer. Transfer to a 4-year institution—or vertical transfer—should not be used as an indicator for transfer to a 4-year degree program because many 4-year institutions offer less than 4-year awards. An outcome rate calculated under the assumption that transfer to a 4-year institution is considered a higher level outcome than transfer to a 2-year institution (regardless of whether the program is 2 years or 4 years) is inflated and should not be used to evaluate the success of institutions' ability to prepare students for transfer into a 4-year program.

Calculating a transfer-out rate that includes students who transferred to a 4-year institution or were substantially prepared for transfer during the tracking period is further complicated by the concept of "substantial preparation." The panel determined that one of the greatest obstacles to implementing an effective change at this time is the lack of a clear and consistent definition of what is meant by "substantially prepared for transfer," and whether it fully addresses all transfer preparation activity across all institutions. At this time, information about the percentage of earned credits that transfer to a degree can only be obtained if an institution requests a degree audit from an external source. As a result, defining substantial preparation is subjective.

The panel was unable to reach consensus on the most appropriate way to measure transfer and substantial preparation for transfer. The TRP suggested collecting the number of students who subsequently enrolled in postsecondary education, without making a distinction between a 2-year or 4-year institution or whether transfer credits were accepted. The panel noted that this count of students provides a meaningful measure in the context of progression and completion outcomes.

Based on this discussion, the panel suggested renaming the GR200 component and revising the component to collect data on the status of the part-time cohort in the following mutually exclusive categories and subcategories:

#### Award

- Subsequent enrollment at your institution
- Subsequent enrollment elsewhere (documented)\*
- Not enrolled at your institution, subsequent enrollment unknown

### No award

- Still enrolled at your institution, no award
- Not enrolled at your institution, subsequent enrollment elsewhere (documented)\*
- o Not enrolled at your institution, subsequent enrollment unknown

## TRP Suggestions for Collecting Progression and Completion for Part-Time, First-Time Students in IPEDS

The panel was asked to consider how best to collect outcomes data for part-time, first-time students and determined that the most appropriate place to capture outcomes measures is in the 200% Graduation Rate (GR200) component. The primary purpose of the GR200 component is to collect more extensive data on graduation rates, as required by HEOA. Data are collected to calculate graduation rates at 200% of normal time for full-time, first-time bachelor degree-seeking students at 4-year institutions and for full-time, first-time degree/certificate-seeking students at less-than-4-year institutions.

The panel agreed that a combined, unduplicated rate that includes both students who earn an award and those who subsequently enroll presents a more complete picture of student outcomes. Further, adding a part-time, first-time degree/certificate-seeking cohort to the component significantly increases the percentage of students included in outcome measures.

Next, the panel focused on capturing outcomes at appropriate points in time without imposing too great a burden on institutions. The length of the time a cohort is tracked has an impact on reporting burden. A longer timeframe means that (1) institutions are required to maintain and update the cohort for the duration of the reporting period; (2) when released, the cohort data are not as timely for institutions to conduct peer comparisons and develop institutional strategies to improve graduation rates; and (3) the information available to consumers may be outdated and therefore somewhat misleading.

Currently, legislation requires institutions to track and report the numbers of students in a cohort who complete a degree or certificate program over several different time periods relative to the normal time for completion of the certificate or degree. Normal time to completion, the amount of time necessary for a student to complete all requirements for a degree or certificate according to the institution's catalog, is defined for full-time students, but not for part-time students. Given the variation in part-time students' enrollment intensity and patterns and the undefined normal time to completion for these students, the panel suggested that the revised GR200 component collect data at yearly intervals. Because HEOA requires a graduation rate for the full-time cohort to be calculated at 200% of normal time to completion, the panel agreed that it makes sense to align the part-time cohort and report on both the full- and part-time cohorts at the same time.

<sup>\*</sup>An institution is required to report only on those students that the institution knows have transferred to another institution. An institution must document that the student actually transferred.

While the group consensus was that it may be preferable to follow best practice and report on the status of the cohort annually, panel members were concerned with the level of institutional burden associated with gathering data from external sources annually to report on student subsequent enrollment at other institutions. The panel examined multiple approaches to reporting, but panel members did not feel that they had enough information to make a more definitive suggestion at this time. The panel suggested that a more focused review be conducted on the level of detail needed to calculate meaningful and valid outcome measures; the availability of data sources; and the most appropriate time intervals to collect outcomes data in IPEDS.

The TRP considered three approaches to modify the current GR200 component to collect data on part-time, first-time degree/certificate-seeking cohorts, as described below.

## Option #1: Report a full status update on the part-time student cohort annually

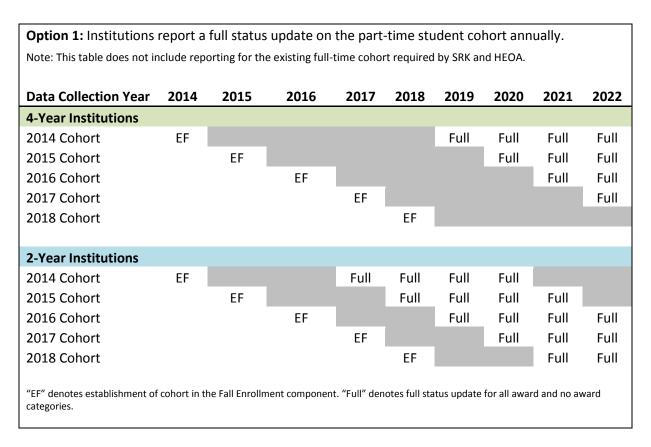
## Part A: Full-time student cohort (current GR200)

- 4-year institutions, 200%
- Less-than-4-year institutions, 200%

### Part B: Part-time student cohort

- 4-year institutions: report a full status update annually starting year 5, with a final full status update at year 8
- 2-year institutions: report a full status update annually starting year 3, with a final full status update at year 6

Under Option #1, 4-year institutions would track the part-time student cohort for 8 years and begin reporting annually in the 5th year after the cohort was established. Two-year institutions would track the part-time student cohort for 6 years and begin reporting annually in the 3rd year after the cohort was established. In each year of reporting, institutions will submit the unduplicated count of students in each of the "award" and "no award" subcategories described above. Once a student is reported in one of the "award" subcategories, the student remains in that category. Thus, in subsequent years, the institution provides updates on students who had not yet received an award.



Option #2: Report an abbreviated status update on the part-time student cohort annually and a full status update in the final year

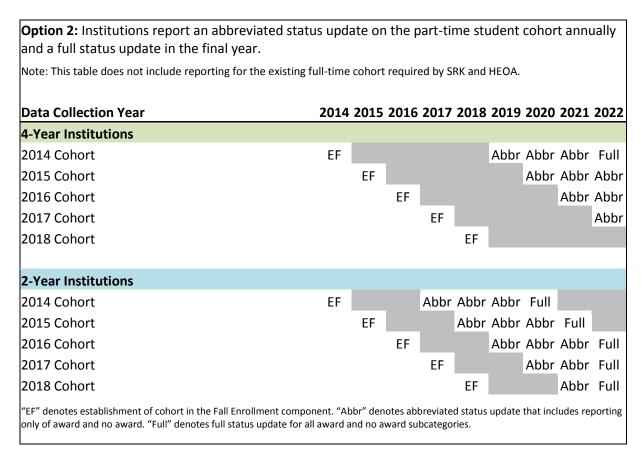
### Part A: Full-time student cohort (current GR200)

- 4-year institutions, 200%
- Less-than-4-year institutions, 200%

## **Part B: Part-time student cohort**

- 4-year institutions: report an abbreviated status update annually starting year 5, with a final full status update at year 8
- 2-year institutions: report an abbreviated status update annually starting year 3, with a final full status update at year 6

Under Option #2, 4-year institutions would track the part-time student cohort for 8 years and begin reporting annually in the 5th year after the cohort was established. Two-year institutions would track the part-time student cohort for 6 years and begin reporting annually in the 3rd year after the cohort was established. The revised GR200 component would collect an annual abbreviated status update (an unduplicated count of students in the "award" and "no award" category but not in each subcategory) for the part-time student cohort. In the final year of reporting, the component will collect the unduplicated count of students in each of the "award" and "no award" subcategories.



Option #3: Report a full status update on the part-time student cohort in the final year including the yearly unduplicated counts for preceding years.

## Part A: Full-time student cohort (current GR200)

- 4-year institutions, 200%
- Less-than-4-year institutions, 200%

### Part B: Part-time student cohort

- 4-year institutions: report a full status update at year 8 for the part-time student cohort for each year beginning with year 5
- 2-year institutions: report a full status update at year 6 for the part-time student cohort for each year beginning with year 3

Under Option #3, 4-year institutions would track the part-time student cohort for 8 years, and 2-year institutions would track the part-time student cohort for 6 years. The revised GR200 component would collect unduplicated counts of students in each of the "award" and "no award" subcategories for each year retrospectively, at year 8 for 4-year institutions and at year 6 for 2-year institutions.

**Option 3**: Institutions report a full status update on the part-time student cohort in the final year for all applicable years.

Note: This table does not include reporting for the existing full-time cohort required by SRK and HEOA.

Data Collection Year	2014	2015	2016	2017	2018	2019	2020	2021	2022
4-Year Institutions									
2014 Cohort	EF					Full	Full	Full	Full*
2015 Cohort		EF					Full	Full	Full
2016 Cohort			EF					Full	Full
2017 Cohort				EF					Full
2018 Cohort					EF				
2-Year Institutions									
2014 Cohort	EF			Full	Full	Full	Full*		
2015 Cohort		EF			Full	Full	Full	Full*	
2016 Cohort			EF			Full	Full	Full	Full*
2017 Cohort				EF			Full	Full	Full
2018 Cohort					EF			Full	Full

"EF" denotes establishment of cohort in the Fall Enrollment component. "Full" denotes full status update for all award and no award categories.

\* denotes year in which all status updates for the particular cohort are reported.

The TRP acknowledged the separate set of challenges faced by technical and career colleges. Many of these institutions offer programs that enroll students on a continuous basis and with programs starting throughout the school year. These institutions typically report to IPEDS on a program basis (referred to as program reporters), which can make creating student cohorts particularly challenging. In light of this, the panel suggested no changes to GR200 forms for less-than-2-year non-degree-granting institutions. The panel suggested that NCES consider the implications for degree-granting program reporters and that NCES encourage comments from representatives of this sector during the public comment period.

## Summary of Proposed Revisions to the IPEDS GR200 Component for 2-Year and 4-Year Institutions

Following is a list of the changes included in the discussion sections of this report.

## CHANGES SUGGESTED BY TECHNICAL REVIEW PANEL #37

Clarify the current definition of a degree/certificate-seeking student for IPEDS purposes to include students who:

- received any type of federal financial aid, regardless of what courses they took at any time:
- received any state or locally based financial aid with an eligibility requirement that the student be enrolled in a degree, certificate, or transfer-seeking program; or
- obtained a student visa to study at a U.S. postsecondary institution

Expand GR200 data collection for 4-year and 2-year institutions reporting on a fall cohort (academic year) as follows:

• collect the status of the part-time, first-time degree/certificate-seeking cohort reported in the Fall Enrollment component.

Because the TRP did not reach consensus on the level of detail collected or the timing of the status update, NCES would appreciate additional comments on this topic.

## Implications on Reporting Burden for Institutions

The panel was asked to estimate reporting burden for institutions, but because of the variability of systems and available data across institutions, no specific burden estimate was determined. The TRP recognized that measuring outcomes related to student success has the potential to impose a high level of burden on institutions. The TRP attempted to minimize burden by aligning the suggested additions to data collected with existing IPEDS components.

The average estimated response burden currently associated with completing the IPEDS GR200 component is approximately 4.1 hours per institution. GR200 is required of all Title IV institutions that enroll full-time, first-time degree/certificate-seeking undergraduate students. In 2010–11, 5,700 institutions in the United States and other U.S. jurisdictions were required to complete GR200. If the suggestion to include part-time, first-time degree/certificate-seeking undergraduate students in GR200 is implemented, the component would be required of all 2-year and 4-year Title IV institutions that enroll first-time students.

Institutions are encouraged to provide estimates of reporting burden for each component during the comment period. The estimate should include time required to review instructions, search data sources, complete and review responses, and transmit or disclose information.

## **Next Steps and Reporting Implications**

Once the TRP summary comment period has closed, RTI will review the comments and provide NCES with final recommendations based on the suggestions of the TRP. NCES will review the recommendations to determine next steps and any reporting implications for IPEDS. Before any changes are made to the IPEDS data collection, proposed changes will be submitted to the Office of Management and Budget (OMB) for information collection clearance. The next OMB package will cover the 2014–15 to 2016–17 IPEDS data collections. NCES would plan to implement any changes based on suggestions from this TRP for the 2014–15 data collection and beyond, with possible preview screens available in 2013–14.

## **Comments**

RTI is committed to improving the quality and usefulness of IPEDS data. We encourage interested parties to send any comments or concerns about this topic to Janice Kelly-Reid, IPEDS Project Director, at <a href="mailto:ipedsTRPcomment@rti.org">ipedsTRPcomment@rti.org</a> by May 29, 2012. As noted above, RTI is specifically interested in the implications on reporting burden as well as on the quality and usefulness of the data elements based on the proposed revisions.