NOTICE CONCERNING THIS SUMMARY:

This report and suggestions were not posted for comment following the Technical Review Panel meeting because NCES resources were dedicated to implementing requirements of the Higher Education Opportunity Act (HEOA), which became law in August 2008, soon after this meeting was held. The passage of the HEOA made clear the Congressional priorities concerning graduation rates data. Section 488(a)(3) added a provision requiring that institutions disclose completion or graduation rates disaggregated by gender; major racial and ethnic subgroup (as defined in IPEDS); recipients of a Federal Pell Grant; recipients of a subsidized Stafford Loan who did not receive a Pell Grant; and students who did not receive either a Pell Grant or a subsidized Stafford Loan. These disaggregated rates are to be disclosed only if the number of students in each group is sufficient to yield statistically reliable information and not reveal personally identifiable information about an individual student. The requirement for disaggregation does not apply to 2-year degree-granting institutions until academic year 2011-12. Additionally, the HEOA created an Advisory Committee on Measures of Student Success which will advise the Secretary of Education in assisting 2-year degree-granting institutions in meeting the completions or graduation rates disclosure requirements outlined in Section 488(a)(3). The committee’s final report is due to the Secretary no later than eighteen months after the first meeting of the committee, anticipated to be held in June 2010.

SUMMARY: The Technical Review Panel suggests a number of additions to the IPEDS GRS survey forms to capture the outcomes of a part-time GRS cohort and a Pell Grant recipient subcohort.

On July 9–10, 2008, RTI International, the contractor for the IPEDS web-based data collection system, convened a meeting of the IPEDS Technical Review Panel (TRP) in Arlington, Virginia, to solicit input from the postsecondary community regarding the feasibility of (1) establishing a part-time Graduation Rate Survey (GRS) cohort and (2) adding a Pell Grant recipient subcohort to the current GRS full-time, first-time cohort. The panel members included 54 individuals representing federal government, state governments, institutions, national data users, associations, and others. The TRP discussed compelling reasons to justify the addition of a part-time cohort to GRS and the critical factors to be considered and defined in order to effectively capture these data. The panel also discussed expanding the current GRS data collection to include a Pell Grant recipient subcohort in light of Congressional interest in disaggregated graduation rates by federal aid programs or income data.

Background

Addition of Part-Time Student Cohort to the GRS

Various sources have called for greater transparency and accountability in postsecondary education outcome measures. The IPEDS GRS helps satisfy institutional reporting requirements
of the Student Right-to-Know Act (SRK) by collecting graduation rates data on a cohort of full-time, first-time degree/certificate-seeking undergraduates. However, approximately 50 percent of first-time students across all sectors are not represented in the current GRS cohort as defined by SRK, including 29 percent of first-time students -- those who attend school on a part-time basis.

Interest in tracking the outcomes of part-time students is growing among policymakers and the postsecondary community. Because the current language of the regulations that implement SRK does not preclude establishing additional cohorts within the current GRS model, RTI International called this meeting of the TRP to discuss incorporating a part-time cohort within the existing GRS reporting structure. Two-year public institutions reported on a part-time, first-time degree/certificate-seeking cohort from 1997 (the first year GRS data were collected) through 1999. In 2000, when IPEDS became a web-based data collection, the part-time cohort was removed from the survey because it is not required by the SRK.

**Addition of a Pell Grant Recipient Subcohort to the GRS**

During the 2006–07 academic year, $12.8 billion in Pell Grant aid was provided by the Federal government to over 5.1 million full-time and part-time students. In order to assess the effectiveness of this program, the Department of Education has identified a set of measures in the Program Assessment Rating Tool (PART), including the annual persistence (retention) rate and annual completion (graduation) rates for Pell Grant recipients. While retention and completion rate data on Pell Grant recipients are currently available through the Beginning Postsecondary Students (BPS) longitudinal study, BPS cannot provide annual measures at the institutional level. At the time this Technical Review Panel meeting was held, it was unclear what requirements concerning reporting or disclosing graduation rates disaggregated by income categories or Federal aid categories would be included in the reauthorization of the Higher Education Act (HEA). See the Notice at the top of this summary for details. An average of 42 percent of full-time, first-time degree/certificate-seeking undergraduate students in the current GRS cohort receive Pell Grants.

**Discussion**

**Addition of Part-Time Student Cohort to the GRS**

IPEDS will maintain the current GRS cohort of full-time, first-time students based on SRK requirements regardless of whether additional cohorts of part-time students and Pell Grant recipients are added. The TRP reviewed compelling reasons to capture part-time student activity within the scope of IPEDS and SRK. 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 of students may be exempt from reporting on such a cohort. As for the technical approach for adding a part-time cohort, the panel agreed that it should be a separate and distinct cohort from the full-time SRK cohort. The panel suggested the following approach:

- **Part-time GRS cohort.** Establish two cohorts on the fall reporting census date or on an annual basis, depending on the current practice of the institution:
  1. GRS full-time (SRK cohort) students (as currently reported)
2. GRS part-time (all additional first-time degree/certificate-seeking) students. After 1 year, students who did not meet the minimum credit threshold (see below) for inclusion in the part-time cohort will be considered exclusions and will no longer remain in the cohort.

- **Minimum credit threshold.** Criteria for inclusion in the part-time cohort should include the following:
  - A minimum threshold of 12 credit hours (or an equivalent number of contact hours) were attempted over a 12-month period (fall, spring, summer I, plus summer II; or summer II, fall, spring, plus summer I) based on the institution’s calendar. For example, if a student attempted 11 credit hours in the fall semester and none in the spring or summer, the student should not be included in the part-time GRS cohort.

The panel noted that program reporters using a full-year cohort may face difficulty meeting the minimum thresholds for late starters because of continuous enrollment.

Additionally, after excluding from the cohort students who did not meet the prescribed minimum credit threshold, institutions will indicate the percentage that is enrolled in developmental courses only. NCES will calculate the percentage of entering students that is represented by the part-time cohort.

The panel agreed that given the nature of part-time education, it would take longer than 150 percent of normal time to gain a valid measure of the proportion of the part-time cohort who complete their program. Thus, the group suggested that institutions report twice on the part-time cohort:

- Once at 150 percent for all sectors (at the 6-year mark for 4-year institutions and at the 3-year mark for 2-year institutions)
- A second time at the 8-year mark, with 4-year institutions reporting their 8-year rate and with 2-year institutions reporting both their 6-year rate and their 8-year rate on the same form.

**Including transfer-out students in the part-time cohort.** The panel agreed that transfers-out should be reported for the part-time cohort according to the same requirements for reporting them for the current GRS cohort -- if the institution’s mission includes substantial preparation for transfer. Reporting transfers-out will be optional for institutions that do not have transfer preparation as part of their mission.

**Optional reporting.** There was a general consensus that 4-year, 2-year, and less-than-2-year institutions with small numbers of part-time students should not be required to track a part-time cohort. The panel suggested that further analysis be conducted in order to determine the appropriate threshold above which institutions should report the new measure. Once such a threshold is established, there would be two points in the reporting at which institutions may be determined to not be required to track the cohort through completion:

1. If, when the initial cohort is established on the Fall Enrollment survey, the minimum threshold of part-time students is not met, the institution will not be required to report part-time cohort data in subsequent surveys.
2. If, 12 months after the beginning cohort is determined, allowable exclusions reduce the cohort size to below the minimum threshold, the institution will not be required to report part-time cohort data.

In discussions that took place during the TRP, it was apparent that institutions and states are using different definitions for degree/certificate-seeking, and that developmental education has significant implications for reported graduation rates. The TRP suggested that these issues should be explored further.

**Addition of a Pell Grant Recipient Subcohort to the GRS**

The panel recognized that, in the end, graduation rates reporting must follow any mandates and regulations that may come out of the reauthorization of the HEA currently before Congress. HEA may require the inclusion of a Pell Grant recipient cohort in the GRS and may address programs other than Pell Grants (e.g., federal loan programs). Because of the complexity of the issue and uncertainty of what Congress will ultimately prescribe, the panel focused its discussion on graduation rates for Pell Grant recipients *only*. See the Notice at the top of this summary for details on HEOA graduation rates disclosure requirements in this area.

**Establishing a Pell Grant recipient cohort.** The panel suggested that the following criteria be used for establishing a Pell grant GRS cohort:

- The Pell Grant cohort should be a subcohort of the existing GRS cohort; that is, start with the GRS cohort of full-time, first-time, degree/certificate undergraduate students
- The subcohort should include those cohort members who received any Pell Grant dollars (disbursements) during the official student financial aid year for the year in which the cohort is established.
- If a Pell Grant was awarded to a student but not disbursed, the student should not be included in the subcohort.

The panel recognized that students in the subcohort may not receive Pell Grants for their entire period of enrollment (beyond the first year) in postsecondary education and that there will be Pell Grant recipients who are not included in the subcohort because they did not receive the Pell grant in the year the subcohort is established (but did in subsequent years).

Additionally, the panel suggested that because many part-time students also receive Pell Grants, if a new part-time cohort is established as suggested above, then a Pell Grant subcohort should also be established for part-time students.

**Reporting Pell Grant recipient subcohort by race/ethnicity and gender.** The panel agreed that unless mandated by the HEA, the subcohort should *not* be disaggregated by race/ethnicity and gender because of data validity issues including small cell sizes and reporting difficulties. Ultimately, however, federal legislation will guide the Pell Grant reporting.
What Are the Reporting Implications of These Suggestions?

IPEDS will maintain the current GRS cohort of full-time, first-time students based on SRK requirements regardless of whether additional cohorts of part-time students and Pell Grant recipients are added. If the suggestions in this report are implemented, the GRS survey forms will be modified to include a section for reporting graduation rates data on a cohort of part-time, first-time degree/certificate-seeking students; and a section to report graduation rates data for both full-time and part-time Pell Grant recipient subcohorts. Graduation rates reporting for all institution types will be affected, and institutional burden will increase to cover the new reporting.

Comments
RTI will take no action on the suggestions offered until interested parties have had the opportunity to comment.