

Report and Suggestions from IPEDS Technical Review Panel 45: Outcome Measures

Based on a review of the current Outcome Measures component, the Technical Review Panel considered a number of potential changes to the survey forms, and provided feedback and suggestions on how changes would impact data quality and reporting burden for institutions. Comments from interested parties are due to Janice Kelly-Reid, IPEDS Project Director at RTI International, at ipedsTRPcomment@rti.org by December 8, 2014.

On September 22 and 23, 2014, 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 solicit expert discussion and suggestions on a broad range of issues related to postsecondary education and the conduct of IPEDS. The TRP is designed to allow the public to advise and work with RTI to improve IPEDS data collection and products, data quality, and user-friendliness. The TRP does not report to or advise the Department of Education (ED).

RTI's specific purpose for TRP 45 was to discuss potential changes to the Outcome Measures (OM) survey component and how changes would impact institutions, researchers, and ED. The panel consisted of 54 individuals representing institutions, researchers and other data users, state governments, the federal government, higher education associations, and others.

Background

The Committee on Measures of Student Success¹ recommended that ED broaden the coverage of student graduation data to reflect the diverse student populations at 2-year institutions and improve the collection of student progression and completion data.² In response, ED released an action plan for improving measures of postsecondary student success³ in support of the Administration's college completion agenda and based on those recommendations.

As part of this activity, RTI convened two meetings of the TRP to address these needs. RTI convened TRP 37 on February 28 and 29, 2012, and TRP 40 on October 23 and 24, 2012, to examine the feasibility of broadening measures by collecting outcome information for part-time degree/certificate-seeking undergraduate students and non-first-time degree/certificate-seeking undergraduate students in IPEDS. After the conclusion of each TRP, RTI posted a summary of suggestions to the web and solicited public comment.⁴

¹ The *Higher Education Opportunity Act* of 2008 established the Department of Education's Committee on Measures of Student Success to advise the Secretary of Education in assisting 2-year degree-granting institutions of higher education in meeting the completion or graduation rate disclosure requirements outlined in the *Higher Education Act* of 1965, as amended. The Committee was charged with developing recommendations regarding accurate calculation and disclosure of graduation rates and recommending additional or alternative measures 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.

² The Committee's final report is available at the following link: <http://www2.ed.gov/about/bdscomm/list/cmss-committee-report-final.pdf>

³ The U.S. Department of Education Action Plan for Improving Measures of Postsecondary Student Success is available at the following link: <http://www.ed.gov/edblogs/ous/files/2012/03/Action-Plan-for-Improving-Measures-of-Postsecondary-Student-Success-FINAL2.pdf>

⁴ Summaries of these meetings are available at the following links:
https://edsurveys.rti.org/IPEDS_TRP/documents/Report%20and%20Suggestions%20from%20IPEDS%20TRP%2037%20-%20FINAL.pdf
https://edsurveys.rti.org/IPEDS_TRP/documents/TRP40_Suggestions_final.pdf

As a result of TRP suggestions and public comments, NCES requested clearance to implement a new Outcome Measures (OM) component in the Winter collection to collect more comprehensive measures of student success for a broader group of students. NCES solicits public comment on proposed changes and is responsible for addressing concerns raised by the public and making changes as necessary. The OM form cleared in December 2013 to be distributed during the 2015-16 collection.⁵ The new outcome information that institutions would report to IPEDS is designed to provide consumers, policymakers, and researchers context for and an alternative to the graduation rates calculated for the purposes of the *Student Right to Know and Campus Security Act* of 1990 (SRK). Under the provisions of the 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. The OM component addresses the often cited limitations related to capturing data exclusively on full-time, first-time degree/certificate-seeking undergraduate student cohorts by expanding the collection of information on a broader group of students in four degree/certificate-seeking cohorts:

- full-time, first-time students;
- part-time, first-time students;
- full-time, non-first-time entering students;
- part-time, non-first-time entering students.

For each of the four cohorts, the OM component collects a status update using the following categories:

- received award;
- did not receive award, still enrolled at reporting institution;
- did not receive award, subsequently enrolled at another institution;
- did not receive award, subsequent enrollment status unknown.

A total of students who did not receive an award will be calculated.

The OM component collects the counts of students from both 2-year and 4-year degree-granting institutions 8 years after the cohort enters the institution, with award information collected for both the 6-year and 8-year timeframes. This means the rates are not dependent on degree. To expedite the availability of data that will be useful to consumers, policymakers, and researchers, institutions will report on their 2007 cohorts in 2015-16.

Overview

Ted Mitchell, the Under Secretary provided opening remarks and presented context for the meeting. As part of the goal for the U.S. to have “the best educated, most competitive workforce in the world,” President Obama announced in August 2013 an initiative to make colleges more affordable and valuable for students and families. As part of this plan, the president directed ED to develop and publish a rating system to provide information about an institution’s performance on a specific set of

⁵ All federal collections must be approved by OMB through a defined process that includes 60-day Federal Register Notice (FRN), 30-day FRN, Package submission. All of the materials are stored on reginfo.gov. Each collection has its own OMB Control Number. The IPEDS OMB Control Number is 1850-0582. The changes to the 2014-15 and 2015-16 data collections are available at the following link: <https://surveys.nces.ed.gov/IPEDS/ChangesOfIPEDSThrough.aspx>

measures, such as access, affordability, and outcomes. The goal of the ratings system is to help students compare the value and affordability of colleges and encourage colleges to improve.

ED plans to release a draft version of the forthcoming Postsecondary Institutional Rating System (PIRS) later this year in the Federal Register. As part of the information gathering process, ED officials worked with stakeholders, such as students and families, researchers, education associations, and the higher education community, to gather feedback about how to best design an effective rating system. Additionally, ED requested written input pertaining to data elements, metrics, methods of data collection, method of weighting or scoring, and presentation frameworks for the PIRS for assessing the performance of institutions, advancing institutional accountability, and enhancing consumer access to useful information. ED received more than 450 written comments from interested parties. As the conversation evolved, ED sought the help of technical and subject-matter experts about measures, data sources, and formulas that might be used to generate ratings. The representative noted that ED recognizes the challenge of developing a system and highlighted the importance of connecting the ratings to the data in a responsible and constructive way.

As of the date of TRP 45, the specifics regarding data elements, metrics, and data collection had not yet been finalized or released to the public. There is a high level of interest in measuring student progressions and completion for consumer information and accountability purposes. The TRP was asked to revisit the OM component and consider changes that would help inform policymakers, consumers, and other stakeholders and further improve outcome data in IPEDS.

Review of Other Measures of Student Outcomes

Several initiatives have been developed by institutions, associations, and other organizations to provide additional information related to student progress and completion. The panel reviewed selected existing measures that report on outcomes of students to consider potential changes to the current OM survey forms. The Student Achievement Measure (SAM) project is a measure of student achievement created as a cross-sector effort of six national associations.⁶ The SAM project provides a common measure for student achievement for public and private, nonprofit universities, and community colleges; participation is voluntary. Two models are included in SAM, one for associate's degree and certificate programs and one for bachelor's degree programs.

The Voluntary Framework of Accountability (VFA) program is a national accountability framework designed to measure community college performance more accurately and define measures that best gauge institutional effectiveness in serving the sector's missions and students.⁷

Both the SAM and the VFA use a cohort-based approach to track students and report outcomes for first-time students. SAM tracks progress of students within a cohort over a 6-year period (full-time bachelor's-seeking cohort and associate's/certificate-seeking cohort) or 10-year period (part-time bachelor's-seeking cohort). The associate's and certificate program model reports outcomes for one time period for each cohort at the end of 6 years. The bachelor's degree model reports outcomes for three time periods for each cohort. The VFA reports 2-year progress measures and 6-year outcome measures.

⁶ American Association of Community Colleges (AACC), American Association of State Colleges and Universities (AASCU), American Council on Education (ACE), Association of American Universities (AAU), Association of Public and Land-grant Universities (APLU) and National Association of Independent Colleges and Universities (NAICU). Funding is provided by the Bill & Melinda Gates Foundation with the Carnegie Corporation.

⁷ The VFA was developed by AACC in partnership with the Association of Community College Trustees and The College Board.

The data used within the SAM model for associate's degrees and certificate programs is the same as is used within the VFA. Work is being done to determine how data can be shared across SAM and VFA.

IPEDS Outcome Measures—Number of Student Cohorts and Cohort Years

IPEDS has historically used the term “cohort” to refer to the groups of students that are established for tracking and reporting graduation rates data. The cohort for reporting graduation rates is legislatively defined and includes all students who enter an institution as full-time, first-time degree/certificate-seeking undergraduates. Institutions will also use a cohort approach to track and report the outcomes of entering degree/certificate-seeking undergraduates in the OM component. The three new student cohorts for the OM component (part-time, first-time students; full-time, non-first-time entering students; and part-time, non-first-time entering students) are groups of students that represent the remaining entering degree/certificate-seeking student population.

Panelists noted that there is general confusion on the differences between the outcome measures and graduation rates. A common misconception is that the outcome measures are an expansion of IPEDS graduation rates collected through the IPEDS Graduation Rates (GR) component and will capture the same level of detail, such as student cohorts by degree-seeking intent (i.e., bachelor's degree subcohort and other degree/certificate subcohort). However, the OM component is a separate component and does not consider the predominant award type offered by an institution (e.g., bachelor's, associate's, or certificate) or time-to-degree and collects the number of students who received *any* award, are still enrolled, or subsequently enrolled at another institution in standard time intervals.

Multiple Cohort Years

The panel considered whether reporting the outcomes of an entering cohort at one point in time would be sufficient for all completion durations and noted that the stability of completion rates can vary by institution and by type of student, particularly for part-time and transfer students. Reporting the outcomes of an entering cohort at one point in time would mean that an 8-year completion rate would use an 8-year-old cohort—and that the 4-year completion rate would be for a group of students that matriculated 8 years ago and completed 4 years ago. Given the decided need for timely and more complete data on student progression and completion to address policy and research questions, the panel agreed that reporting the status of the entering cohort at one point in time would not be sufficient for all completion durations.

As a result of this discussion, the panel recognized there may be a need to collect the outcomes of cohorts at several points in time. Although this would mean that institutions would report on the status of multiple cohorts from several different entry years in any given collection year, panelists saw the value of collecting data on multiple cohort years to document change and reflect institutional improvement over a period of time. However, they also noted that tracking and reporting multiple cohort years increases the burden and complexity of the data collection. For example, panelists noted the challenges of establishing cohorts retrospectively, particularly for institutions that have implemented new student data systems over the past several years.

Time-to-Degree Durations

The panel considered whether different time-to-degree durations should be used for institutions based on their predominant degree type. Given the variability of completion rates across different types of programs and award levels, panelists from for-profit institutions and 2-year institutions questioned the value of using broad 8-year standards to collect outcomes from all degree-granting institutions.

They noted that the final status of the cohort at one point in time—8 years after matriculation—inadequately measures outcomes of associate’s degree-granting institutions. Part of their concern relates to using the same time-to-degree durations to compare 2-year associate’s-degree granting institutions, 4-year predominantly associate’s degree-granting institutions, and 4-year predominantly bachelor’s degree-granting institutions.

The panel did not come to a conclusion on the most appropriate way to collect award outcomes from institutions that offer multiple degrees. Panelists noted that asking institutions to report the time-to-degree durations based on predominant degree type would further increase burden and lead to greater inconsistency for institutions that award multiple award types. While there is a high level of interest in having more detailed information about paths to degree and award-level outcomes, panelists agreed that disaggregating the entering cohort by award-level intent (e.g., certificate, associate’s, bachelor’s) would add substantial burden, particularly for small institutions. Furthermore, many students do not declare their intent when they matriculate, and panelists agreed that reporting this level of detail would pose serious challenges to institutions. Panelists also raised concern with the potential for misrepresentation, such as coding students whose intent is unknown into less demanding programs to increase outcome rates. Additionally, panelists were unsure whether collecting these breakdowns would be appropriate for all institutions (e.g., institutions with missions to prepare students for transfer).

Instead, they suggested that collecting information about the distribution of awards by type (e.g., bachelor’s, associate’s, certificates) be explored. One approach would be to collect an unduplicated count of students who earned an award, disaggregated by the highest award level earned (e.g., certificates of less than 1 year, certificates of at least 1 but less than 2 years, associate’s degree, bachelor’s degree). Students who earn multiple awards would not be double-counted in the completion rate but instead would be reported in the highest award level earned in a given time period. Another approach would be to consider any degree a positive outcome and collect outcomes for all degrees in one combined category. While the panel agreed that this would impose a lesser burden than reporting in separate award level categories, several panelists raised concern that reporting aggregate awards would limit the utility of the data for institutions that offer multiple award levels. RTI would appreciate additional comments on this topic, particularly with respect to the appropriate approach and associated burden.

Time Intervals

The panel considered the intervals at which the outcome information should be collected and noted that time intervals impact how outcome rates are presented to the public. A common complaint from community colleges is that by only looking at 6-year and 8-year outcomes, the measures remove an incentive to help students complete more quickly. In addition, several panelists noted that collecting information only on awards at 6 years fails to capture important transfer outcomes that may occur earlier in the tracking period. The panel considered several approaches for capturing more detailed progression and completion outcomes but did not reach consensus on the intervals at which such data should be collected and ultimately provided two options for public consideration, as shown in exhibit A. The two options are discussed following the exhibit.

Exhibit A. Options 1 and 2 for reporting the status of cohorts in a given data collection year

Collection year	Option 1		Option 2		
	Starting year A	Starting year B	Starting year A	Starting year B	Starting year C
	Years 2, 3, 4	Years 6, 8	Years 2, 3, 4	Years 5, 6	Years 7, 8
2010	2006 cohort	2002 cohort	2006 cohort	2004 cohort	2002 cohort
2011	2007 cohort	2003 cohort	2007 cohort	2005 cohort	2003 cohort
2012	2008 cohort	2004 cohort	2008 cohort	2006 cohort	2004 cohort
2013	2009 cohort	2005 cohort	2009 cohort	2007 cohort	2005 cohort
2014	2010 cohort	2006 cohort	2010 cohort	2008 cohort	2006 cohort
2015	2011 cohort	2007 cohort	2011 cohort	2009 cohort	2007 cohort
2016	2012 cohort	2008 cohort	2012 cohort	2010 cohort	2008 cohort
2017	2013 cohort	2009 cohort	2013 cohort	2011 cohort	2009 cohort
2018	2014 cohort	2010 cohort	2014 cohort	2012 cohort	2010 cohort

Institutions would establish the cohort of entering students and report on an annual unduplicated count of students within a cohort at set reporting periods. Students would never be removed from the original entering cohort but would instead shift between the different outcome categories as they progress toward a degree. In any given year, institutions would be looking back retrospectively to report outcome data for students in multiple cohorts. Panelists noted that these alternate models are similar to an annual update to the SAM model.

Option 1: Report Each Entering Cohort Twice

Under this approach, institutions would track and report on two cohorts retrospectively in any given year. Institutions would track the cohorts for 8 years and report on the status of the cohorts in five time periods at two points in time: annually starting 4 years after entry and again 8 years after entry on years 6 and 8. For example, in 2016, institutions would report on the status of the 2012 cohort for three time periods (status at 2 years, 3 years, and 4 years), and the status of the 2008 cohort for two time periods (status at 6 years and 8 years).

Option 2: Report Each Entering Cohort Thrice

Under this approach, institutions would track and report on three cohorts retrospectively in any given year. Institutions would track the cohorts for 8 years and report on the status of the cohort in seven time periods at three points in time: once 4 years after entry on years 2, 3, and 4; again 6 years after entry on years 5 and 6; and again 8 years after entry on years 7 and 8. For example, in 2016, institutions would report on the status of the 2012 cohort for three time periods (status at 2 years, 3 years, and 4 years); the status of the 2010 cohort for two time periods (status at 5 years and 6 years); and the status of the 2008 cohort for two time periods (status at 7 years and 8 years).

The panel also discussed collecting the status of the cohort in a standardized hierarchy of outcomes. However, panelists were unable to reach a clear consensus on the most appropriate hierarchy of outcome measures. After consideration, panelists agreed that a hierarchy of outcomes would not be feasible because this approach would not take into account transfer behavior and the swirling nature of students' path toward a degree.

Reporting Subsequent Awards and Enrollments from Other Institutions

The current OM component collects information on the enrollment status of any student from the four entering cohorts who has not received an award as of the reporting period. Each student is reported in one of the following categories: number of students still enrolled at the reporting institution; number of students subsequently enrolled at another institution; or number of students whose subsequent enrollment status is unknown. Currently, institutions are asked to report on the subsequent enrollment of students who are known to have transferred to another institution. Including subsequent enrollment as a status category allows institutions that have substantial preparation for transfer as part of their mission the option to report such students.

The panel was asked to review the subsequent enrollment status category and discuss whether all institutions should report the subsequent enrollment of students who have left their institutions. The panel was also asked to consider whether institutions should also report on the awards earned by such students from *other* institutions after they have transferred to another institution.

Sources for Enrollment and Degree Verification

The panel discussed current sources of enrollment and degree verification, and also discussed potential limitations. Some institutions rely on the National Student Clearinghouse and Statewide Longitudinal Data Systems (SLDS) as sources to find out whether students who leave their institutions transfer to other schools and earn awards from other institutions. In addition, a number of proprietary institutions participate in the State Authorization Reciprocity Agreement, which can be used to provide clarity on where student data is housed.

The panel agreed that considerations should be made for institutions that do not participate in the Clearinghouse to prevent participation from becoming a de facto mandate. Panelists suggested that it is important to define what would be an acceptable error rate for an institution using Clearinghouse data and stressed that the Clearinghouse is not a national solution. The panel also noted that it would be unlikely that state systems, such as SLDS, could be used to provide useful data for institutions that enroll a high proportion of out-of-state and international students. A known limitation to state systems is the general inability to provide information on students who transfer to schools across state borders.

The panel discussed how an important distinction should be made that IPEDS is an institution-level data collection and the outcome measures are considered an institution measure, not a student measure. In the absence of a coordinated student unit record system, the need for more outcome information must be balanced with the potential reporting burden institutions face in collecting outcome information. Overall, panelists agreed that collecting data on the progression and completion of students could best be captured through student-level data, rather than institution-level data. Since IPEDS does not collect student-level data, panelists agreed that the measures should be as simple and as straightforward as possible.

Subsequent Enrollment

While the panel agreed that subsequent enrollment can and should be reported as an outcome, they had a variety of opinions on the most appropriate model to collect this type of information. Panelists from community colleges noted that there would be value in maintaining comparability by collecting data on known subsequent enrollments from all institutions, regardless of whether transfer is part of the institutional mission. However, several panelists raised issues with the ability of institutions to access such data, as well as the consistency and completion of the data sources since many institutions do not have the ability to track and report this information. While the OM component will

accept an institution's response of subsequent enrollment status unknown, panelists were concerned that collecting such information would imply that institutions are required to track subsequent enrollment. They felt that the "unknown" response implies a negative outcome and questioned the appropriateness of this measure in proposed accountability activities. Although NCES has no requirement that an institution must share its data with a third party to report outcome measures, panelists were concerned that a perceived penalty for reporting a high number of unknowns would pressure institutions to participate in the Clearinghouse.

In addition, several panelists expressed concern that collecting subsequent enrollment would not be appropriate for all sectors. For example, a particular concern from the for-profit sector relates to credit transfer policies and restrictions. Panelists noted that a number of public and private not-for-profit institutions have policies that restrict or prohibit transfer credit from for-profit institutions. Unless a student from a for-profit institution transfers to another for-profit institution, it is unlikely that the student would be reflected in the reporting institution's subsequent enrollment rate. Panelists from this sector were concerned that collecting subsequent enrollment would put for-profit institutions and other institutions without transfer as part of their mission at a disadvantage.

If subsequent enrollment is collected, the panel recommended that institutions cite the source of information. They further recommended clarifying who is being reported as subsequently enrolled (e.g., post-degree students, pre-degree students, or both). Additionally, the panel felt that more clarity is needed for reporting re-enrollment for degree recipients.

Subsequent Awards Earned from Other Institutions

In addition to subsequent enrollment, the panel considered collecting the completion of awards earned from other institutions as a result of students' subsequent enrollment. While some panelists saw value in reporting all outcomes to capture more complete measures of progression and completion, several panelists argued against reporting subsequent awards to IPEDS. They noted that attributing awards earned elsewhere as a successful outcome for the originating institution presumes that the originating institution somehow contributed to the students' academic progress. Aside from questions about the appropriateness of using awards from other institutions to measure student outcomes, a number of panelists failed to see the value gained by reporting subsequent awards in an institution-level data collection. Panelists noted that the intent of the outcome measures is to assess institutional effectiveness (i.e., the success attributable to an institution) and questioned how institutions without strong transfer missions could take credit for success at subsequent institutions, since the institution has no control over students after they leave. Again, issues of consistency and access to the data needed to report subsequent awards were raised. Panelists were also concerned that collecting an institution's subsequent degree rate in IPEDS could introduce an additional layer of complexity when considering the application of such data in accountability measures.

The panel considered whether institutional mission should be considered in the collection in granting a possible exemption from reporting subsequent awards. Given the multiple, broad missions of institutions, several panelists were unsure how the institutional missions would be defined. For example, the Institutional Characteristics component collects the institution mission statement, but many institutions have additional roles and missions grounded in the overall context of the published mission statement, such as commitments to support first-generation college students and low-income families. Additionally, the mission statement may guide the kinds of degree programs the institution offers. The panelists noted that it is unclear what latitude is feasible for defining the missions (e.g., would the percentage of degrees conferred in a given CIP define the mission?).

The panel noted that the level of detail in which data are collected will impact cell sizes, potentially resulting in small student counts if transfer is not part of the institution’s mission. They noted that in cases of small cell sizes, the collection of subsequent enrollment and degree rates should mirror the cohort default rates (CDRs) and allow an opt-out for institutions that are unable to report. By default, opt-out conditions would not apply to institutions that have transfer as part of their missions, but reporting should not be required or tied to accountability measures.

The panel agreed that if subsequent awards are reported, they should be reported in the same models as other outcome measures, as shown in exhibit B.

Exhibit B. Option for reporting outcome measures by award type

		Reporting year															
		2011				2012				2013				2014			
		E	C	A	B	E	C	A	B	E	C	A	B	E	C	A	B
2010	Full-time, first-time																
	Part-time, first-time																
	Full-time, non-first-time entering																
	Part-time, non-first-time entering																
		2012				2013				2014				2015			
		E	C	A	B	E	C	A	B	E	C	A	B	E	C	A	B
		2011	Full-time, first-time														
Part-time, first-time																	
Full-time, non-first-time entering																	
Part-time, non-first-time entering																	

Note: **E** = Enrolled; **C** = Certificate awarded **A** = Associate’s degree awarded; and **B** = Bachelor’s degree awarded.

Several panelists raised concerns that there is a clear disadvantage for institutions that do not participate in the Clearinghouse. Without a federally sponsored system, there are concerns about the reliability of the data on subsequent degree rates. In addition, there were concerns with using information gathered from self-reported student surveys given the generally low response rates and questions about the reliability of the data.

Panelists from state systems noted that most states maintain longitudinal data systems that could track in-state transfers. The data from state systems (if available) could then be supplemented by other sources, such as the Clearinghouse and regional cooperatives for institutions to report subsequent degree rates in IPEDS. A possible option would be for institutions to supplement the data from the Clearinghouse and state systems with data from other sources that rely on self-reported data,

such as Facebook or LinkedIn. Information about the sources used by the institution would be collected to provide policymakers and data users context to assess the reliability of the data. Another possible option would be for ED to identify and approve sanctioned sources for institutions to use to collect information on transfer students. However, several panelists felt that it is important to consider accuracy of external sources and questioned whether it would be appropriate for ED to recognize or vet sources to provide an endorsement of their quality.

Despite the considerations, the panel noted that some institutions will still be at a disadvantage in reporting, such as institutions that enroll a significant number of out-of-state and international students, 2-year public institutions and for-profit institutions, and institutions with reciprocity agreements that do not participate in the Clearinghouse. Online institutions will be at a particular disadvantage in reporting and will face a substantial burden in tracking subsequent enrollment and awards.

Collecting Outcomes by Demographics

In an attempt to minimize burden, NCES decided not to collect data in OM by race/ethnicity and gender on the current OM form. Given the high level of interest in student outcome data, the panel was asked to revisit this decision and consider whether adding these demographics would create an undue burden on institutions and make cell sizes too small for some cohorts.

Gender and Race/Ethnicity

The panel noted that any level of disaggregation to the data collection will increase burden. While adding race/ethnicity and gender would result in a large number of cells for institutions to complete and impact cell sizes, there is a demonstrated need for having demographics. Panelists raised concern that collecting this level of detail would result in small cell sizes and would add significant burden. Additionally, it may be problematic and overly burdensome for institutions to report demographic information on retrospective cohorts, especially in years that used the old race/ethnicity categories.

If this level of detail is collected, panelists suggested that the data be rolled up or suppressed if insufficient in size. To alleviate burden, the panel suggested collecting gender separately from race/ethnicity (instead of data on gender cross-referenced by race/ethnicity) to reduce the number of cells institutions would have to report. Since the intent of the outcome measures is to measure institutions, not students, the panelists felt that this approach provides sufficient data for policy questions and analysis but alleviates some of the burden.

Several panelists suggested if the OM component is deemed at some point to be comprehensive enough, it should replace the GR component to lessen or reduce reporting burden for institutions. Replacing GR would improve usability of the data and also reduce the confusion of having multiple measures of student outcomes, which may, in turn, reduce the burden on institutions. The panelists felt that consolidating and condensing the GR and OM components into a single collection would collect more comprehensive data in a way that can clearly be communicated to policymakers, researchers, and other stakeholders. Additionally, the panelists suggested managing burden by expanding the OM forms to collect graduation rates of federal student aid recipients for institutions that are required to disclose such information. Panelists noted that the disaggregation would provide useful context to progression and completion outcomes. Since institutions are already required to collect and track this information, they felt that this change would not introduce significant additional burden.

However, several panelists were hesitant to recommend replacing the GR component with the OM component at this time, given the number of cells.

Other Considerations

Panelists noted that other demographic information, such as socioeconomic background, first-generation college student, age, and residency, are better predictors of outcome than race/ethnicity and could measure how well institutions serve different populations. They further noted that age is a better predictor of outcome than race/ethnicity and gender in some sectors of institutions, such as community colleges and for-profit institutions. For example, age (e.g., greater and less than 24) can be a responsible proxy for academic preparation, delayed entry, and other measures that have a direct impact on outcome. Considerations for additional breakouts include English as a second language and first-generation status, international/domestic status, socioeconomic status (e.g., financial aid status or estimated family contribution cutpoints), and enrollment in Science, Technology, Engineering, and Mathematics (STEM) fields.

However, several panelists raised concerns with how these changes would impact the OM component. A panelist from the community college sector noted that Pell status as a financial aid variable is useful, but Pell as a proxy for income is problematic in some sectors and institutions. Additionally, the STEM disaggregation would be problematic given that there is no standard definition of STEM.

Using FSA Data Services to Report Outcomes

A representative of the Office of the Under Secretary prepared the slides shared with the TRP to promote a discussion regarding useful data reporting that FSA could provide. While FSA has not committed to providing anything specific as it relates to outcome measures, there may be an opportunity to obtain complementary information to the outcome measures, such as subsequent enrollment and award information by similarly constructed cohorts. For example, reporting by financial aid type (e.g., Pell Award) could be accomplished through FSA data systems.

In the last 8 years, FSA has introduced a number of enhancements to its system. Before the enhancements, National Student Loan Data System (NSLDS) enrollment reporting had a single record type, with one record per student. Permanent address was optional and there was no program-level information or email address. Now there are multiple record types, with multiple records per student. Additionally, schools are required to report students' program-level enrollment information to NSLDS. This includes a host of program information, including Classification of Instructional Programs (CIP) Code and program credential level. The six-digit CIP code (without period) identifies a program's academic content. All programs for a student must be reported. Metadata about program level is available in the Postsecondary Education Participants System data file. The panel was asked to consider whether FSA data sources could be used to prepare reports on behalf of institutions to shift the burden from the institution.

Panelists considered how the FSA-defined cohorts would differ from institutional cohorts. They noted that no specific cohort exists in the system, making it difficult to align the FSA data to the OM cohorts. Cohorts would be empirically created by observing enrollment history. Additionally, the system includes federal recipients only (e.g., Title IV aid, loans, and Pell Grants) and would not include students who only received institutional or state-sourced funds. Also not included are students who fill out the FAFSA but do not receive Title IV loans or Pell Grants; self-pay students; students with Parent PLUS loans; and student athletes and other students who receive full scholarships, among others.

Panelists noted that federal loans programs set cumulative borrowing limits that vary by grade level progression (freshman, sophomore, junior, senior, graduate/professional student) and noted that the grade level of the student would be available through NSLDS. However, unlike loan limits, Pell Grants are not tied to year in school or grade level. Students can have up to 6 years of eligibility for Pell Grants, and while information is available on when the student began the program, there is no grade-level indicator. Panelists noted the risk of including false first-time beginners (i.e., transfer students who were not previous aid recipients).

Panelists also cited additional data limitations to consider (e.g., race/ethnicity data are not collected). While other demographic data (e.g., gender) are in the FAFSA application system, data in the FAFSA system are separate from the distribution system and most demographic information is optional.

Panelists raised concern with using FSA-defined cohorts to create institutional measures, given the limitations to the data. Since students who do not receive federal financial aid will be unaccounted for in the FSA data systems, they felt that this could create substantial issues for institutions that enroll a large number of non-Pell/non-loan students, such as part-time students, students who are not U.S. citizens, and students who only receive private or state aid. Additionally, this would impact institutions that do not participate in federal loan programs. Panelists also noted that it is common for students enrolled at community colleges to take several classes during their initial enrollment period before they apply for and receive federal financial aid. In this case, panelists were unsure whether it would be possible to populate historical enrollment from NSLDS once a student becomes aided or if the institution would have to rely on the Clearinghouse or another source for enrollment verification.

Panelists noted that NSLDS is insufficient for the purposes of outcome measures because subsequent enrollment and degree information for only aided students would not provide a consistent measure for comparing institutions. In addition, the NSLDS-defined outcomes would not be comparable to the outcome measures collected through the IPEDS OM component because the cohorts are defined differently. Since institutions would need to audit their NSLDS-defined cohorts, the burden on institutions would not be significantly reduced if FSA prepared these reports. Panelists noted that this could actually increase institutional burden if institutions identify inaccuracies in the reports. For example, institutions that identify inaccuracies in CDR reports must submit a data challenge to the draft CDR or submit a data adjustment after the official release of the CDR. The panelists pointed out that burden is associated not only with identifying and challenging the inaccurate data, but also with preparing and providing explanations to the institution administration about the incorrect published rates. Panelists agreed that given the technical issues related to the FSA-defined cohorts and the concerns raised about burden, further study is needed to assess the feasibility of using FSA reports for outcome measures.

The panel suggested that there is value in exploring the extent to which institutions could use NSLDS enrollment data as a source for enrollment verification, especially if institutions will be mandated to report on subsequent enrollment. This could provide an alternative to the third-party sources, such as the Clearinghouse, that institutions would need to use to verify subsequent enrollment. For example, institutions could submit data for each of the student cohorts to NSLDS to match with federal aid recipients and get data back for enrollment verification. Additionally, panelists noted that NSLDS could be used to report more information on student loan performance on measures such as replacement rates and payment progress.

Panelists expressed concern with the way institutions with multiple campuses would be represented in these measures, since the unit of measurement (i.e., institutions) in FSA data sources and IPEDS

do not always align. These differences were specifically discussed in two previous TRPs (TRP 42: Defining an IPEDS Institution (Part I) and TRP 43: Defining an IPEDS Institution (Part II)).⁸ Before taking any action, the panel suggested that further consideration is needed to address the balance between meeting the demand for data and imposing an undue level of burden on institutions. Specifically, the degree of burden associated with collecting, tracking, and reporting the data to the OM component should be considered in comparison with the burden institutions would experience internally with reporting data of questionable accuracy that eliminates large groups of students.

Next Steps and Reporting Implications

Once the TRP summary comment period has closed, RTI will review the comments and outline recommendations for NCES based on the outcome of the TRP meeting and subsequent public comment period. NCES will review the recommendations to determine next steps and any reporting implications for IPEDS. Proposed burden estimates will be submitted to OMB for information collection clearance. The current collection expires in December of 2016. NCES could plan to implement changes to the currently approved OM data collection that will start in 2015-16, in the following areas:

- frequency of reporting outcomes;
- reporting outcomes by degree/certificate earned;
- time intervals for reporting outcomes;
- reporting subsequent enrollment at other institutions;
- reporting subsequent awards earned from other institutions;
- reporting cohort data by race/ethnicity and gender; and
- reporting cohort data by other demographics.

Comments

RTI is committed to improving the quality and usefulness of IPEDS data as well as strategies that might be helpful in minimizing additional institutional reporting burden. We encourage interested parties to send any comments or concerns about this topic to Janice Kelly-Reid, IPEDS Project Director, at ipedsTRPcomment@rti.org by December 8, 2014.

⁸ Summaries of these meetings are available at the following links:
https://edsurveys.rti.org/ipeds_trp/documents/TRP_42_Report_and_Suggestions.pdf
https://edsurveys.rti.org/ipeds_trp/documents/TRP_43_Report_and_Suggestions.pdf