



January 17, 2017

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

Dear Ms. Mullan:

This letter is submitted on behalf of the Association of Public and Land-grant Universities (APLU) and the American Association of State Colleges and Universities (AASCU) in response to the November 9, 2016 announcement regarding the addition of Pell disaggregates to the Outcome Measures (OM) survey component of the Integrated Postsecondary Education Data System. Collectively, APLU and AASCU represent over 500 public, four-year colleges and universities enrolling nearly two-thirds of the nation's undergraduates.

We appreciate the Department's detailed consideration of technical recommendations submitted by the data policy community, including those from the [PostsecData Collaborative](#) and [APLU](#) on April 18, 2016, and the decision to convene Technical Review Panel #50 in August 2016 to discuss the proposed changes to IPEDS. In agreement with many of our colleagues within the PostsecData Collaborative, we are further encouraged by the revised proposal to include Pell recipient data in the IPEDS Graduation Rates (GR) survey component in 2016-17 to match the pre-existing disclosure requirement in the Higher Education Act and produce a measure that is comparable to other completion rates.

APLU and AASCU support the intent to capture information about the postsecondary students who are not accounted for within the traditional first-time, full-time student cohorts by the inclusion of Pell cohorts in OM. However, after consultation with data professionals on our member campuses, we do not support collecting Pell outcomes through a full-year cohort for academic reporters in OM without addressing the concerns outlined in the [Technical Review Panel #50 Report and Suggestions](#) (see pages 3-4). Those concerns include the heterogeneity of cohorts, enrollment status changes, lack of integration with other IPEDS surveys, institutional burden, and the introduction of multiple completion rates.

The continued and enhanced collection of these data is vital to understanding and ultimately supporting better postsecondary outcomes for all students. The Department of Education's willingness to incorporate feedback into its processes and implement these revisions demonstrates its responsiveness to the field, commitment to improving student success, particularly among students from low-income backgrounds, and dedication to supporting our institutions of higher education in their mission to educate those students.

Thank you for the opportunity to comment and offer technical feedback. If you have any questions, please do not hesitate to contact Christine Keller at [ckeller@aplu.org](mailto:ckeller@aplu.org) or Tom Harnisch at [harnischt@aaascu.org](mailto:harnischt@aaascu.org).

Sincerely,

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Association of Public and Land-grant Universities

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American Association of State Colleges and Universities