Suggestions for Improving the IPEDS Graduation Rate Survey Data Collection and Reporting
This project has been funded, either wholly or in part, with federal funds from the U.S. Department of Education under Coffey Consulting, LLC’s Contract No. ED-04-CO-0044/0001.

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National Postsecondary Education Cooperative

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July 2010

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Suggested Citation

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Introduction

In 1990, Congress enacted the Student Right-to-Know (SRTK) Act which requires colleges and universities to disclose the rate students complete academic programs at postsecondary education institutions. Specifically, the Act stipulates that institutions are required to report the percentage of first-time, full-time degree/certificate-seeking undergraduate students who complete programs within 150 percent of the normal time required (e.g., students that earn a 4-year bachelors degree within 6 years). If the mission of the institution includes providing substantial preparation for students to enroll in another eligible institution without having completed their programs, the institution must also disclose the number of students who successfully transfer to another postsecondary institution. An institution is required to report only on those students that the school knows have transferred to another institution. If transfer preparation is not a part of the institution’s mission, reporting transfer data is optional.

The National Center for Education Statistics (NCES) at the U.S. Department of Education developed the Graduation Rate Survey (GRS) to help institutions comply with the SRTK requirements. NCES uses GRS data to calculate graduation rates within 150 percent of normal time for all students in the GRS cohort, as well as 100 percent and 125 percent of normal times for students seeking bachelor’s degrees, by race/ethnicity and by gender. For 2009-10, information on the numbers of students who completed their programs’ within 200 percent of normal time was collected for all institutions as a result of the Higher Education Opportunity Act of 2008 (HEOA). The first GRS collected data for undergraduates who entered 2-year colleges in 1994 or 4-year institutions in 1991. All institutions participating in the federal student financial assistance programs in Title IV of the Higher Education Act of 1965 (HEA) are required to complete surveys in the Integrated Postsecondary Education Data System (IPEDS), including the GRS survey.

Responding to the GRS is wrought with complexities. Respondents are required to be aware of which students to include (e.g., can first-time students attending the previous summer be included), which students to exclude (e.g., can students who
temporarily stop their studies because of military service be excluded), and the dates used to compute an accurate graduation rate. The purpose of this paper is to present recommendations for reducing complexity and confusion of completing the GRS survey as well as improve the standardization of data. The paper summarizes findings from two activities: deliberations of the NPEC GRS Working Group (with feedback from the full NPEC membership) and an analysis of graduation rate survey perceptions using entries in the Common Dataset listserv.

\[1\] Recommendations in this paper only focus on ways that the National Center for Education Statistics and its partners may improve standardizing, reporting, and using GRS data. Recommendations related to changing the GRS survey itself is beyond the scope of this paper and requires a number of administrative processes (e.g., changes in the law, regulations, technical review panels, etc.).
Analysis of Graduation Rate Survey Perceptions

In order to uncover perceived problems that respondents may have in completing the Graduation Rate Survey, NPEC conducted a qualitative analysis of communications to the Common Dataset listserv, which is used by many IPEDS data providers.\(^2\) Data from the listserv allowed NPEC to analyze patterns in the qualitative data indicative of whether any ambiguity is evident in the instructions or methodology for completing the survey.

Findings

An analysis of the qualitative data yielded four themes including problems or issues with

1. counting and defining the composition of an initial cohort of students;
2. counting and defining who is a completer;
3. understanding the length or time of completion; and
4. incorporating students who transfer out of an institution.

While potential respondents to the GRS may have had difficulty in these areas, it is important to note that these are perceptions. Instructions and data definitions may be perfectly clear, but complexity may increase the time that new data reporting coordinators learn the GRS. This section will briefly describe each of these difficulties to provide context for recommended changes to the GRS. Detailed findings with supporting information from the listserv are available in Appendix B.

\(^2\) The archived listserv threads can be located at the following URL: http://www.cblist.org/read/?forum=cds.
1. Counting and defining the composition of an initial cohort of students.

The first theme identified from the listserve e-mails is related to counting and defining the composition of an initial cohort of students. E-mail participants noted ambiguities or misunderstandings regarding

- inclusion of degree-seeking students with other-than-4-year degrees;
- verifying the degree-seeking intent of students;
- properly identifying first-time full-time students;
- inclusion (or not) of students in 2/3 programs who never earn an undergraduate credential; and
- verifying the reasons students depart for the purposes of removing them from a cohort due to a valid reason.

2. Counting and defining who is a completer.

The second theme identified from the listserve e-mails is counting and defining a successful completer. Similar to the previous theme, data reporting coordinators sometimes had difficulty in appropriately identifying who qualifies as a completer for the appropriate cohort group. A review of the e-mails indicated issues with

- whether to include or exclude of students pursuing other than 4-year degrees in as completers;
- how to include students who earn multiple degrees at an institution;
- whether to count students who successfully transfer to another institution without earning a credential;
- determining which students in 2/3 programs should be counted as completers and those who are non-completers; and
- whether to include transfer students who earn a degree at another institution as a completer or not.
3. Understanding the length or time of completion

The third theme identified from the listserve e-mails is related to understanding the amount of time used for the cutoffs for calculating graduation rates. Depending on the sector or number of degree/certificate levels at an institutions, there may be 2-year, 3-year, 4-year, 5-year, 6-year, and/or 100 percent time or 150 percent time graduation rates. Respondents to the GRS survey were sometimes confused about

- the date cutoffs used for setting a cohort;
- the date cutoffs used for determining if a students is considered a completer or not;
- whether or the number of completers are cumulative (i.e., to add 4-year completers to a 6-year graduation rate) or not; and
- how to count completers with multiple degrees at an institution.

4. Incorporating students who transfer out of an institution

One section of the GRS is devoted to reporting the number of students who transfer out to another institution. Individuals posting to the listserve noted the following:

- It was sometimes difficult to understand if the institution was required to report transfers or if it was optional.
- There are no methods available to identify all students who transfer to another institution versus those who stop-out (the National Student Clearinghouse is the most popular option for tracking students).
- There is a large investment of time and resources to adequately track students who transfer to other institutions.

3 Because the 200 percent graduation rate is relatively new, there were no messages on the listserve that discussed that rate.
Recommendations

The suggestions below focus on reducing the complexity and confusion of completing the GRS survey by recommending clarifications to GRS instructions and definitions, ways to display of information, and potential best practices.

Improvements to the IPEDS GRS Data Collection

The NPEC Working Group identified several ways in which the data being reported to NCES through GRS might be improved.

Clarifications of Instructions and Definitions. Changes to the current criteria for inclusion in the cohort are suggested in the areas of financial aid eligibility, definition of formal award (a combination of two or more courses with some level of recognition as identified by the institution) and remedial education. Specific suggestions for instructions and FAQ are included in Appendix B. These definitions should also apply to glossary, the Completions Survey and Fall Enrollment, which establishes the GRS cohort.

Best Practices. As part of training efforts for IPEDS GRS, institutional GRS best practices that focus on comparability should be identified and communicated to IPEDS keyholders and the institutional research community. Best practices should focus on areas such as the following:

1. Identifying Cohorts: Best practices for identifying the correct students to include in the GRS cohort should be identified. These may include using various internal and external strategies for determining students who meet the IPEDS definitions for
   - degree-seeking status;
   - first-time status; and
   - full-time status.
Examples of external data sources may include statewide data bases and national data bases, such as the Student Tracker of the National Student Clearinghouse.

Identifying and Counting Exclusions: Highlighting strategies to identify exclusions from the cohort for the following documented reasons could be valuable:

- The student is deceased or is totally and permanently disabled and thus unable to return to school.
- The student left school to serve in the armed forces or was called to active duty.
- The student left school to serve with a foreign aid service of the Federal Government, such as the Peace Corps.
- The student left school to serve on an official church mission.

Reporting Outcomes: Identifying institutions’ practices for correctly classifying outcomes for the cohort would also be beneficial, including how institutions might use internal and external (where appropriate) resources to identify award completers, exclusions, transfer-out students and transfer preparation completers.

Improvements to the Dissemination and Display of GRS Data to Student and Parents

The NPEC Working Group members also made suggestions for how the Department of Education might also better disseminate and display GRS to students, parents, and the general public.

Consistent Reporting. It is suggested that the dissemination and display of GRS data, particularly to students and parents, be consistent across the Department of Education. For example, if different areas of the Department are reporting different data years, then information reported on one resource may be inconsistent with information on another. The Working Group suggests that the College Navigator be the single data/display source and that other Department of Education websites provide links to the College Navigator. Reasons to use College Navigator as the single source include the following:
College Navigator is the most current data available since NCES updates it as soon as possible after the data collection, quality assurance procedures, and migration are complete.

The display is in a user-friendly format.

Contextual information is provided so that graduation rates and the limitations of the rates and the cohorts are explained.

The additional data beyond graduation rates (e.g., enrollment, admissions, tuition and fees, average student financial aid) that College Navigator provides is of value to consumers.

The College Navigator design permits side-by-side comparisons among institutions.

**Responsible Display and Institutional Comparisons.** A GAO report emphasized that:

“Graduation rates do not capture differences in mission, selectivity, programmatic offerings or student learning outcomes. Nor do they account for another goal of higher education, increasing participation. In other words, a college or university could have a low rate of completion, but still be providing access. As policymakers consider ways to hold colleges and universities accountable for their performance, it may be possible to use multiple measures that capture an institution’s performance in regard to how well its students are educated through the use of student learning outcomes, in addition to its performance in graduating them.”

NCES is to be commended for its efforts to provide some contextual information. It is suggested that additional contextual and comparative information be added and that NCES consider the following:

1. In the comparative portion that users may select “favorites,” the Navigator could be modified to assure that 2-year or less than 2-year and 4-year institutions are not compared on graduation rates or by adding language that emphasizes that comparisons of graduation rates for these institutions is inappropriate because of differences in mission.

2. NCES could generate a comparison group, e.g., the existing comparison groups in the IPEDS Data Feedback Report as an option for users.

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Display and Other Reporting Changes. Because there is confusion among data reporters, it may be difficult for data users to understand graduation rates as well. It is suggested that NCES consider adding the following to the College Navigator:

1. A combined transfer and graduation rate display.
2. A 5-year running average graduation rate displayed with low and high plus the most recent reported year.
3. A threshold of the number of students for display of GRS data in the College Navigator. One possibility is the California No Child Left Behind factor (at least 50 students in the cohort).
4. Providing contextual information in the retention and graduation rates display for 4-year institutions that are primarily associate degree granting institutions, e.g., chart showing Retention Rates for Students Primarily Seeking Bachelor’s Degrees.
5. Clarifying potential inconsistencies in definitions. The major elements that define the cohort – the time period of college attendance and students’ status as first time, full time and degree seeking (including the meaning of a credit or contact hour or what programs are considered degree-seeking and whether the institution or student determines degree-seeking status) are subject to some degree of interpretation by institutions, which could lead to differences in graduation rates. Users should be made aware that definitional differences may account for some differences in graduation rates.

Further Study

Finally, the NPEC Working Group identified areas in which further study could be performed that might help improve the GRS data collection. These studies could be
commissioned by NPEC in its capacity for performing research and development work for IPEDS or by NCES through some other means. The following studies are suggested:

**Study of end-of-fall, full-year, or fall cohort options.** Institutions use two cohorts in the GRS: fall cohort and full-year cohort. An institution’s response to the predominant calendar system (question on the Institutional Characteristics survey) predetermines the cohort in the GRS. Institutions that offer a predominant number of programs based on standard academic terms (semesters, trimesters, quarters, 4-1-4 plan, or other academic calendar) report using a fall cohort of students, which includes the preceding summer term. Institutions may use a census date of October 15, 20xx, or the end of the institution’s drop-add period or another official fall reporting date to determine the cohort. This census date should be the same reporting date established in the IPEDS Fall Enrollment report.

Institutions that do not offer a predominant number of programs based on standard academic terms (as defined above) report using a full-year cohort. These institutions must count as entering students all those students who entered the institution between September 1, 20xx and August 31, 20xx, and who were enrolled for at least 15 days in a program of up to, and including, 1 year in length, or 30 days in a program of greater than 1 year in length.

With trends in more flexible and continuous enrollment practices, particularly in 2-year and less than 2-year programs, many students may not be captured with the current definitions. The study should address whether a single reporting approach would result in data that includes a higher percentage of students in postsecondary education and greater comparability among similar institutions.

Efforts now underway by VSA may inform to this overall effort. The VSA Success and Progress Rate are calculated for an academic year.
Study on definitions and implications of transfer out and swirling. The implication of varying definitions of transfer, practices among states including forward and reverse transfers should be studied. The study should also assess how “core curriculum completion” that is less than 2 years affects transfer and consistency between GRS and the Completions survey for transfer preparation programs. The transfer definitions are in legislation and regulations. The regulatory language refers to 2 years of study but preparation could take place at a fewer number of credits or without a formal award. The current definition includes students who change schools regardless of the “transfer” of credit.

Efforts now underway by VSA may inform this study. To reflect the realities that many students now attend more than one institution before they graduate, the VSA has created a new metric, the “Success and Progress Rate” that provides a gauge of student progress through the higher education system. The Success and Progress Rate is generated using data from the National Student Clearinghouse for two student cohorts – first-time, full-time students and full-time transfer students. These rates are calculated for an academic year versus a fall or spring term. The calculation is based on “end of term” data rather than “census point” or “20th day” data. Using this approach, graduation rates are similar to the traditional IPEDS graduation rate, but are not the same for most institutions. The denominator used in the Success and Progress graduation rate includes only the students from the cohort who have a matching record at the Clearinghouse (it excludes international students without social security numbers). Research on community colleges in Florida may also inform the study.5

Study on collecting information for “still enrolled” students. These data were collected in GRS at one time, but no longer are collected. An analysis of how these data affect the overall graduation rate could be useful. Some of these data are now publicly available.

As an example, the College Portrait shows these data for students still enrolled at a) the home institution, b) still enrolled at another higher education institution, and c) graduated from another institution for a 4- and 6-year period.
Appendix A: About the National Postsecondary Education Cooperative (NPEC)

The National Postsecondary Education Cooperative (NPEC) was established by the National Center for Education Statistics (NCES) in 1995 as a voluntary organization that encompasses all sectors of the postsecondary education community including federal agencies, postsecondary institutions, associations and other organizations with a major interest in postsecondary education data collection. NPEC’s mission is to "promote the quality, comparability and utility of postsecondary data and information that support policy development at the federal, state and institution levels." NCES has assigned NPEC the specific responsibility for developing a research and development agenda for the Integrated Postsecondary Education Data System (IPEDS), a comprehensive system of interrelated surveys collecting institutional level data. IPEDS is the primary source for data on colleges, universities, and technical and vocational postsecondary institutions in the United States.

NPEC is advised by Individuals who serve on the NPEC Research and Development Panel, and the NPEC Graduation Rate Survey (GRS) Working Group was formed for the purposes of reviewing the quality and comparability of data collected in GRS and suggesting ways the reporting process could be improved. The Working Group was also charged with identifying topics for future studies. Members of the Working Group are listed in Appendix A. The NPEC GRS Working Group commissioned this paper to explore how federally mandated reporting of graduation rates can be improved to result in better and more comparable information for students, parents, counselors, researchers and policymakers, all of whom will benefit from more accessible, comparable information on graduation rates.
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Appendix B: Methodology and Detailed Findings

In order to uncover perceived problems that respondents may have in completing the Graduation Rate Survey, NPEC conducted a qualitative analysis of communications to the Common Dataset listserv. The Common Data Set (CDS) is a cooperative initiative among the College Board, higher education data providers, and publishers designed to standardize some data elements in publications directed to the general public (such as College and University guides). The CDS survey requests graduation rate data that utilize instructions, methodology, and definitions from the IPEDS GRS. This allowed NPEC to analyze patterns in the qualitative data indicative of whether any ambiguity is evident in the instructions or methodology for completing the survey. The research question that guided this analysis is as follows:

What factors in the IPEDS Graduation Rate Survey lead to ambiguity among respondents and/or contribute to inaccurate data reporting?

Methodology

This analysis utilizes data from the CDS listserv, which is publicly available on the College Board’s website. 6 Two searches were conducted using the search engine for the list using the terms “GRS” and “graduation rates.” Over 10 years (1999-2010) of listserv threads containing these terms were downloaded and imported into a spreadsheet. The entire spreadsheet was read and initial themes in the text were identified. The data were then provided initial codes, sorted, and the process was repeated to identify sub-themes. The data were then coded again. The following verification procedures were utilized to ensure validity in the analysis:

6 The archived listserv threads can be located at the following URL: http://www.cblist.org/read/?forum=cds.
**Member Checking** – While access to specific members was limited, a second reader, familiar with institutional research, read through the listserv threads independent of the first reader. The second reader reviewed the data coding and analysis of the first reader to ensure the codes generated and classified to each comment were consistent with the author’s language and intent.

**Triangulation** – Data were triangulated with GRS call logs from IPEDS helpdesk.

**Saturation** – One limitation of the analysis is that the listserv did not generate enough conversation to achieve saturation. Therefore, additional factors not identified in this paper may lead to confusion among institutional researchers completing the GRS survey.

While this analysis did not exhaust all of the verification procedures available in qualitative research, the rigor of the findings for this assessment is sufficient for the purpose of this policy analysis.

**Detailed Findings**

An analysis of the qualitative data yielded four themes including problems or issues with

1. counting and defining the composition of an initial cohort of students;
2. counting and defining who is a completer;
3. understanding the length or time of completion; and
4. incorporating students who transfer out of institutions.

This appendix describes each of these difficulties to provide context for recommended changes to the GRS.
1. Counting and defining the composition of an initial cohort of students.

One issue data reporters identified as difficult in the GRS is counting and defining the composition of an initial cohort of students. Under SRTK, the cohort includes students in any degree level (i.e., certificates, associates, bachelors). The GRS has a number of additional sub-cohorts, including a bachelor’s cohort where students are identified as bachelor’s degree seeking. Data reporting coordinators note that it is sometimes difficult to identify which students are within each degree level. One person noted:

“Two-year degree seekers should be taken out of the original cohort of 4-year degree granting institutions for those seeking a 4-year degree. Of course the problem is that students do not always declare their intent or program at some schools. . . . So the 2-year degree students may have to be taken out after the fact, that is, after they receive their 2-year degree.”

This researcher notes that it can be difficult for the institution to properly classify students in a beginning cohort if they do not collect information about a student’s intent.

Another difficult some institutional researcher noted is that the definition of first-time full-time students can be confusing. Multiple respondents did not know if they could include high school graduates who entered the institution with college credit. While confusion exists, another respondent believed the instructions to be clear:

“I am not sure how much more specific the GRS can be. . . .the Glossary to the GRS defines first-time freshman and first-time student the same way they are defined for fall enrollment and in both cases these are to include students who started the previous summer or who earned credit while still enrolled in high school.”

Finally, new respondents to the GRS were unclear if they needed to include students in 2/3 programs\(^7\) in the initial cohort. One individual noted:

“... We offer a five year PharmD that undergrads enroll directly in and never receive a bachelor's degree. We follow the six-year rate as per the explicit instructions, because there really isn't any wiggle room in them. (If anyone has found the secret wiggle room, let me know!) So we lose these folks on GRS completely, and have for a while.

The frustrating thing about them is that optimal degree progression for them is to make it all the way through and never wash out of the program and thus maybe receive a bachelor's degree in whatever else. So it's like the folks we do get to count as successes are actually people who didn’t make their intended majors. We lose probably a couple percentage points on these folks a year.”

Readers were referred to instructions on the IPEDS website that instructed respondents not to exclude students in 2/3 programs.

**2. Counting and defining who is a completer**

The second issue identified in the CDS listserve was that it was sometimes difficult to identify some completers. One source of confusion is counting completer who don’t earn credentials. For example, one e-mail addresses many issues:

“I just had a conversation with someone in response to my earlier reply which suggested there are several layers of confusion here about who is a completer for purposes of the GRS (and then the CDS).

\(^7\) 2/3 programs are programs transition into a professional program after two years of undergraduate study without earning an undergraduate credential.
The GRS definition of a "completer" is different in part from the definition used in the Completions Survey, because it allows for students who complete a transfer preparatory program (within 150%) to be counted as "completers," in addition to those students who receive a degree. ([Name Removed]—does this cover all the students you were asking about?)

Should students who do not receive an undergraduate degree, but who complete an advanced degree (graduate or professional) within 6 years be counted as "completers"? The GRS forms and instructions do not appear to consider this possibility. But, the Student Right-to-Know regulations (on which the GRS is based) do not make a distinction about what kind of degree the student receives.

If the transfer-preparatory criterion above does not apply to a student who receives an advanced degree (but not an undergraduate degree) within 6 years, then it would seem logical that the student should be counted as a "completer"—but as a completer of the advanced degree, not as a completer of an undergraduate degree. This would require a minor adjustment to the GRS forms.

What's not so clear in the circumstances [Name Removed] outlined is what to do about the student who does not complete the advanced degree within 6 years. The problem seems to be how to define 150% for these students. Since [Name Removed] doesn't know when they first enter the institution and are placed in a cohort whether they are going to enter the professional program, does he re-calculate 150% for these students at the time that they do so? I think this may be one of those cases where institutions might be allowed to do something that they wouldn't be required to do.
The issues identified by e-mails in the listserve include whether or not to count students
- in 2/3 programs never earn a credential as a completer;
- in transfer preparatory programs as a completers; and
- who transfer and earn a degree at another institution.

Further clarification over the listserve indicate that students in 2/3 programs and certain
transfer preparatory programs may be counted as successfully completing a 2-year but
less than 4-year program. Students who transfer out of the institutions cannot be
counted as completing a credential if they earn it at another institution.

Some other issues identified by list participants about counting completers
involve how to count students with multiple degrees or students in the bachelorette
cohort who earn a less-than-4-year credential. One complication of determining the
number of completers is that data reporting coordinators may need to adjust cohorts
after the fact because a student’s degree intent may not be clear. As reported by one
individual:

“. . .I was on the original Graduation Rates panel that discussed this issue and the
intent of the calculations. Two-year degree seekers should be taken out of the
original cohort of 4-year degree granting institutions for those seeking a 4-year
degree. Of course the problem is that students do not always declare their intent
or program at some schools; I don't know your procedures. So the 2-year degree
students may have to be taken out after the fact, that is, after they receive their
2-year degree.

In any event, you can not count a 2-year degree as "completion" of a 4-year
program, which is measured as 150 percent of the 4-year program.”
3. Understanding the length or time of completion

The next issue that may be confusing to some respondents is determining the appropriate beginning and end dates for each of the GRS time periods. Multiple list participants noted that differences between the cut off dates for the Completions and GRS surveys can lead to confusion. It was also noted that outside surveys use a fiscal year for determining completions rather than the GRS time periods:

“. . . the IPED Completions definition calls for counting completions through June 30, but the IPEDS Graduation Rate Survey that meets SRTK requirements runs through August 31 for counting completions. So even IPEDS is not consistent, and that is also why some universities continue counting through the summer. The IPEDS Completions data is reported during the time period that most of us are filling out the CDS and/or responding to guidebook requests, so I agree that July 1 through June 30 is the logical of the two IPEDS "academic year" periods to use.”

There was also debate about whether the cutoff date for determining a completion is the end of the spring semester, the end of the summer (August 31st), or a floating cutoff depending on the calculation (100 percent versus 150 percent):

“I take this [the instructions] to mean that a "year" is Summer graduation (August), mid-year graduation (December), Spring graduation (May). Therefore the 4-year graduation terms for the entering cohort is anything through 1998 and May 1999. 5-years is August & December 99 and May 00. 6-years is August & December 00 and May 01. BUT, IPEDS further states:
‘However, the Technical Amendments that redefine the cohort year allow you to count completers through August 31 of the summer following the sixth year of a 4-year program.’

Since this only specifies August of the 6th year, I think 6-years then becomes August & December 00 and May & August 01—being the only year with 4 graduations. This coincides with NYSEDs use of the July 1 to June 30 calendar (with a "year" being summer, mid-year and spring), except for the Technical Amendment for the 6th year.”

One list participant responded and attempted to clarify the instructions:

“Regarding the graduation years - I think you are making it much too hard. I have interpreted the 'year' is for this report is defined between September 1 and August 31. That shifts the numbers for an August graduation to the previous May instead of the following May that we are used to for the Completions report. Since the question asks how many students complete in '4 years or less', the cutoff for four years would be anytime prior to the Fall semester of the fifth year. Five-year graduations would be from 9/1 to 8/30 of the fifth year, and six-year graduations between 9/1 and 8/30 of the sixth year.”

Another issue identified on the listserv is what date to use when defining an initial cohort (especially for institutions that are not on a traditional calendar). When one e-mailer asked what date institutions used to define a cohort, responses included October 15th (the date defined in IPEDS if an institution does not have a Census date) 10-21 days after the start of classes in a semester, or the end of the semester. No “best” practice was identified.
4. Incorporating students who transfer to other institutions.

The final theme identified in the analysis involves the reporting of students who transfer out of a target institution to another college or university. Respondents felt that it was unclear if they were required to report this data or not. The problem is related to identifying whether the institutions have a transfer mission or not. One list participant stated:

“Just recently, I have been reading the various so-called definitions of a ‘transfer-out,’ and I just can't get clear about how IPEDS intends the category to be understood. Can someone help me out, please? Specifically, the current (2004) definition seems to say that only institutions whose mission includes preparing students to transfer to another institution would have transfers-out. I take that to mean institutions with transfer AA degree programs or dual-degree programs where the student transfers before earning a degree. Am I understanding this correctly?”

Another respondent had similar issues:

“One more item of confusion about the IPEDS instructions on TRANSFERS-OUT: After indicating that if preparing students to transfer to another ‘eligible institution’ (I’m not quite sure what that means) is not part of a college’s mission, then N/A will be inserted into the transfer-out column, the next (and last) sentence is: "You may, however, report transfer-out data if you wish." What sort of data does this mean, and why would one wish (or not wish) to report it? Does this constitute an invitation to all institutions to report transfers-out, one which does not REQUIRE such reporting (since the responses I have received about this issue so far indicate that the Student Right to Know legislation prohibits REQUIRING such reporting—I might be putting too much weight on the
words used in Carol’s response, but it is the only thing that came close to helping me understand that last sentence.”

The second major issue data reporters identified with responding to the question on the number of transfer students is how to separate students who transfer from students who stop out. Most institutions use the Student Clearinghouse:

“We do use the Clearinghouse here at Saint Xavier to capture the transfer-out numbers for the IPEDS Graduation Rates Survey and the information we get back from them also includes if they graduated from that institution thus prompting our concern as to whether we can include them in the graduation count. But thank you all for the feedback.”

But e-mailers noted that it does not capture all students with one person commenting that “we've done it [tracked students through the Clearinghouse] in the past, but it only tracks students who transfer to participating schools.” While it may be required of some institutions to report on students who transfer to other institutions, some noted that there is high burden in obtaining the data.

5. Other themes.

While the themes listed above focus on potential problems that new respondents to the GRS may have in completing the survey, another theme identified in the review of the CDS listserve involves where respondents go to develop meaning and understanding of graduation rates. When survey instructions are unclear or are misinterpreted, survey respondents review

- legal or regulatory requirements (such as the Higher Education Act, Student Right to Know Act, and the federal register); or
- data definitions developed by NCES or technical review panels.
Appendix C: Clarifications of Instructions and Definitions

Changes to the current criteria for inclusion in the cohort and relate to award and first-time, full-time are suggested in the areas of financial aid eligibility, definition of formal award (a combination of two or more courses with some level of recognition as identified by the institution) and remedial education. These definitions should also apply to glossary, the Completions Survey and Fall Enrollment (which establishes the GRS cohort) and are summarized below with suggested wording changes in **bold**:

**Instructions—Who to Include in the Cohort**

Include all full-time, first-time degree/certificate-seeking undergraduate students entering the institution either during the fall term or during the 12-month period as described above. Include students enrolled in the fall term who attended college for the first time in the prior summer term. Students must be enrolled in courses creditable toward a degree, diploma, certificate, or other formal award. Include students enrolled in courses that are part of a vocational or occupational program. **For reporting purposes a formal award is defined as a combination of two or more courses with some level of recognition as identified by the institution.** INCLUDE those enrolled in off-campus centers and those enrolled in distance learning/home study programs. Be sure to include full-time students taking remedial courses if the student is considered degree-seeking for the purpose of student financial aid determination, **whether the student applies for aid or not. These criteria apply if, any, or all of the student’s courses are remedial and development education.** A student who is designated as a member of the 20xx cohort remains in the 20xx cohort, even if the student

- becomes a part-time student.
- transfers to another institution.
- drops out of the institution.
- stops out of the institution.
• has not fulfilled the institution’s requirements to receive a degree or certificate.

(Note: These definitions should also apply to glossary, the Completions Survey and Fall Enrollment (which establishes the GRS cohort).

Changes to FAQs

Current Question: How do I report students who are taking ESL (English as a Second Language) or developmental courses?

Current Answer: These students are not included in the cohort if their courses are not part of a program of study that leads to a degree, diploma, certificate, or other formal award and if they are not eligible for Title IV Federal financial aid.

Reword Answer: These students are included in the cohort if their courses are part of a program of study that leads to a degree, diploma, certificate or other formal award and if they are eligible for Title IV Federal financial aid whether they apply or not.

Additions to FAQ

Add:

Question: If a student enrolled in an institution and drops out after the first semester and then many years later (e.g., 15 years later) enrolls in my institution, should I classify the student as first-time?

Answer: No, students with any previous postsecondary experience—regardless of how long ago it occurred—are not considered first-time for the purposes of the IPEDS GRS cohort.