Improving College Access and Completion for
Low-Income and First-Generation Students

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Chairman Kline, Ranking Member Scott, the leadership of the Higher Education and Workforce Subcommittee – Ms. Foxx and Mr. Hinojosa—and subcommittee members, I am appreciative of the opportunity to participate in this hearing discussing strategies for improving college access and completion for low-income and first-generation students.

My name is Michelle Asha Cooper, and I am president of the Institute for Higher Education Policy (IHEP). IHEP is a nonpartisan, nonprofit organization committed to promoting access to and success in higher education for all students, with a focus on students who have been underserved by our postsecondary system. Based in Washington, DC, we believe that all people, regardless of background or circumstance, have the opportunity to reach their full potential by participating and succeeding in higher education.

In support of this goal, IHEP offers the following recommendations for consideration in the reauthorization of the Higher Education Act:

1. *Collect and provide better information—more useful data presented in a useable format—to students, policymakers, and institutions to inform decision-making.*

2. *Increase investment in the Pell Grant and simplify the financial aid process.*

3. *Strengthen federal support for TRIO and GEAR UP programs to improve postsecondary education opportunities for low-income and first-generation college students.*

4. *Set high expectations for Minority-Serving Institutions (MSIs) and support MSIs that serve students well.*

I. Postsecondary Access and Success for Today's College Students[i]

First-generation college students—those whose parents did not attend postsecondary education[ii] — represent nearly a third of the nation's undergraduates,[iii] making them a critical population of focus if we are to meet our nation's educational attainment goals. Even before they arrive on a college campus, first-generation students must overcome many obstacles, principally due to their lack of familiarity with college processes. For the first-generation students who do manage to enroll in college, they are more likely than their peers to be racial/ethnic minorities, financially independent, have dependents, and come from low-income backgrounds.[iv] These students also tend to enroll part-time, work more than 40 hours a week, rely more heavily on federal Pell Grants, be less academically prepared, and attend public two-year or for-profit institutions (although first-generation students are represented within every institutional type).[v] All of these characteristics are shown to be negatively correlated with college enrollment and persistence. For instance, first-generation students are much less likely than their peers to have earned a four-year degree six years after entering college.[vi]

These trends, however, are not immutable. Through targeted policies and interventions at the federal, state, local, and institutional level, we can – in fact, we *must* – drive improvements in student success for first-generation college students. The students themselves are relying upon the opportunities that a college degree will afford them, and our society as a whole is relying upon the economic and societal benefits that will flow from increased educational attainment and social mobility.

II. The Role of Minority-Serving Institutions in First-Generation Student Success[vii]

Minority-Serving Institutions (MSIs) serve large proportions of first-generation students. These institutions, which comprise Historically Black Colleges and Universities (HBCUs), Hispanic Serving Institutions (HSIs), Tribal Colleges and Universities (TCUs), Asian American and Native American Pacific Islander-Serving Institutions (AANAPISIs), and Predominately Black Institutions (PBIs) have a legacy of providing increased access to some of the nation's underserved students and often implement innovative practices and strategies to support stronger student success.[viii] Their work with first-generation students is an important component to achieve broader educational and societal goals.

In 2011–12, the 634 MSIs included in an IHEP analysis—HBCUs, TCUs, HSIs, and PBIs—comprised 14 percent of all degree-granting, undergraduate-serving institutions.[ix] They were concentrated primarily in cities (50 percent) or large suburbs (21 percent); the majority of HSIs were located in California, Florida, New Mexico, and Texas, while most HBCUs are in the South or Southeast.

The majority of MSIs are public institutions—21 percent are four-year institutions and 41 percent are community colleges—but about a third (31 percent) are four-year private nonprofit institutions and another 6 percent are private two-year colleges. Together, these MSIs enrolled about 5.3 million undergraduates in 2011–12, 22 percent of all undergraduate enrollment and 39 percent of all undergraduate students of color.[x] Each type of MSI also educates a significant proportion of its target population. For example:

- HBCUs comprise only 2 percent of all degree-granting, undergraduate-serving colleges and universities, but enroll 8 percent of all Black undergraduate students. PBIs make up 3 percent of institutions but enroll 11 percent of Black students.
- The small number of TCUs enroll approximately 10 percent of all American Indian students.
- HSIs represent about 8 percent of institutions, but 51 percent of Hispanic enrollment.

MSIs tend to serve students who have been historically disadvantaged in their access to and success in postsecondary education, including low-income and first-generation college students. For example, 44 percent of undergraduates at MSIs received a Pell Grant in 2011–12 compared with 38 percent of undergraduates in non-MSIs. Two-thirds of students at HBCUs receive Pell Grants. More than half of MSIs have an open admissions policy and as a result admit students who may require developmental education.[xi]

Due in part to these factors, students enrolled at MSIs often face barriers to graduating on a timely basis. On average, retention and graduation rates at four-year MSIs are lower than those of other four-year institutions. For example:

- The six-year graduation rate for bachelor's degree–seeking students is lower at four-year MSIs compared with non-MSIs: 38 percent versus 61 percent, respectively.[xii]
- The three-year graduation rate[xiii] at two-year MSIs is also lower compared with two-year non-MSIs: 21 percent versus 35 percent (although the higher rate at non-MSIs is partly driven by high certificate completion rates at two-year for-profits).

Despite these lower rates, MSIs are a key part of postsecondary degree production:

- HBCUs awarded 31,730 degrees and certificates to African American undergraduates, eight percent of the total awarded to African-American undergraduates by all institutions. PBIs awarded an additional 49,846 or 13 percent.
- TCUs awarded 2,092 credentials to American Indian students, eight percent of the total.
- HSIs made 159,369 awards to Hispanic students, 40 percent of the total.

The fact that MSIs both enroll and graduate large numbers of students of color underscores the importance of encouraging and supporting these institutions to help even more of their students complete degrees, which could have a substantial impact on higher education attainment in this country.

III. Promising Strategies for First-Generation Students: Examples from the MSI Community[xiv]

Recognizing the postsecondary access and completion barriers facing first-generation students, institutional leaders, federal and state governments, and others have tried to target various forms of assistance to help these students. In fact, resources available to first-generation students have broadened considerably over the years. Today, we recognize that no single strategy alone will increase access and success for first-generation students. Instead, a combination of targeted academic, social, and financial supports, integrated faculty-driven and classroom-based practices, and strong commitment from institutional leaders can increase the likelihood that first-generation students will succeed. Some examples of promising strategies from within the MSI community are described in Table 1 below.

Table 1. Examples of MSIs Working to Support First-Generation Student Success

INSTITUTION	SECTOR	STUDENT SUPPORT EFFORTS
South Seattle Community College (WA)	AANAPISI	South Seattle Community College (SSCC) is focused on developing programs, curriculum, and other resources that are **culturally relevant** to Asian American and Pacific Islander (AAPI) students. Specifically, the college's AANAPISI program features four types of strategies that are designed to: 1) improve AAPI freshman experiences, through the use of **Clustered Learning Communities** and **peer navigators**; 2) improve AAPI **transitions to college coursework**, through transition workshops; 3) improve AAPI retention and outreach, through a combination of **family orientation workshops** and the **AAPI Higher Education Resource Center**, which shares promising practices among the higher education community that serve AAPI students well; and 4) increase AAPI graduation and transfer rates to four-year institutions**,** through the development of **new degree programs**, such as an Associate of Elementary Education degree that encourages more AAPI students to become teachers and role models in the broader community. While SSCC focuses on developing strategies that serve AAPI students diverse needs, these resources are available to all students.
Fayetteville State University (NC)	HBCU	Fayetteville State University (FSU) is committed to **high-impact access and success practices** that engage all students, but are targeted to improve outcomes for male students. Through the implementation of an **early alert system** and other **department- and institution-level assessment tools**, FSU is working to identify at-risk students earlier and is seeking to better target interventions to help them succeed, including **residential summer bridge programs** and **linked learning communities/first-year experience programs**, to name a few. Similarly, **male-centered initiatives**—Male Initiative on Leadership and Excellence, the Boosting Bronco Brothers Transition to FSU, and Captain of My Destiny—serve as models for advancing Black male achievement. As an early adopter of the **Collegiate Learning Assessment** (CLA), FSU has strengthened its commitment to improving student learning.
Norfolk State University (VA)	HBCU	Norfolk State University (NSU) has developed a Communities of Inquiry program, which leverages existing **faculty development** efforts and the expertise of NSU faculty to strengthen student success efforts. The program provides faculty with an established forum to work collaboratively to discuss, share, and **design innovative pedagogical and assessment practices**. Faculty members from across disciplines and departments develop research and tools on effective teaching and learning practices. For example, when NSU's institutional research office identified students' inability to manage their learning process as a significant barrier to the success of their first-generation students, faculty authored a series of reports on how "**self-regulated learning**" can help these students. Self-regulated learning is pedagogy focused on helping students take more **ownership** over and **responsibility for their own learning process**. By integrating self-regulation strategies into their teaching and learning practices, faculty advanced student achievement.

St. Edward's University (TX)	HSI	St. Edwards's University (SEU) has maintained its institutional commitment to underserved students while "growing" the institution – in size, academic quality, faculty caliber, and infrastructure. SEU has had a diverse student body: approximately 25 percent first-generation; 44 percent minority; and 36 percent Pell Grant recipients, on average, since 2000. All SEU students are exposed to a range of high-impact success strategies, such **as living-learning communities**, **peer mentoring and supplemental instruction**, **career preparation**, and **undergraduate research opportunities**, to name a few. Underserved students benefit tremendously from these active teaching and learning practices, as the college takes a targeted approach to tailor efforts to their needs. In addition, one of SEU's signature initiatives in the College Assistance Migrant Program (CAMP), which provides comprehensive support to **students from migrant and seasonal farm worker** families. Although federal support is limited to the freshman year, SEU has established an institutional endowment to provide full tuition and academic support for all CAMP students who maintain satisfactory academic progress. Also, SEU can boast the highest six-year graduation rate—72 percent—among all Hispanic-Serving Institutions.
The University of Texas at El Paso (TX)	HSI	The University of Texas at El Paso's (UTEP) involvement with **Early College High Schools** (ECHS), a **partnership with El Paso Community College** and **El Paso Public High Schools**, is helping many students reduce time-to-degree and college costs. Because of the ECHS program, many students now graduate from high school with an associate's degree. To help these students continue on the pathway to the baccalaureate, UTEP has changed **transfer pathways**, **academic support services**, **scholarship programs**, and other critical campus programs and policies to ensure successful completion of a four-year degree program. Critical to UTEP's success is a campus-wide commitment to **using data** to better track students' progress and inform institutional decision making. In the past 10 years, UTEP has experienced growth in total undergraduate enrollment and degrees awarded. Also, UTEP is a leader in graduating Hispanic students and ranks seventh nationally as a top feeder school for Hispanic doctorates.
Salish Kootenai College (MT)	TCU	Salish Kootenai College (SKC) has developed **data-driven solutions** to increase participation and completion, particularly for American Indian students. With 70 percent of entering SKC students requiring developmental instruction, the college has placed significant attention on improving the academic success of these students. In particular, SKC offers **accelerated options for developmental education** and provides **wrap-around support services** designed to help students succeed. By using data to better understand the demographic characteristics and trajectories of their student body, SKC recognizes that effective strategies need to be institutionalized and embraced by the entire campus community. Therefore, at the heart of SKC's access and success efforts are the faculty members. Faculty members regularly engage in **professional development** that emphasizes teaching and learning. They have **revised their curricular and pedagogical practices**; and beyond the classroom, they **serve as mentors, career coaches, tutors, and trusted advisers**. SKC's intensive efforts to improve the success rates of all students, but particularly those enrolled in the developmental curriculum has led to an increased graduation rate.

IV.   Recommendations to Better Serve First-Generation & Low-Income Students

While institutions have the most direct impact on individual students, federal policies also influence first-generation and low-income students and their chances of postsecondary success. The reauthorization of the Higher Education Act is an opportunity to reassess college access and completion policies, with an eye toward addressing the needs and challenges of today's students. We offer the following federal policy recommendations for better supporting first-generation and low-income students, as well as the institutions serving them:

1. *Collect and provide better information — more useful data presented in a useable format — to students, policymakers, and institutions to inform decision-making.*

For first-generation and low-income students, having access to clear and reliable information is critical. These students need to know their chances of graduating, how much college will cost and how they can pay for it, their likely debt at graduation, and what employment outcomes they can expect. While existing data tools, like the U.S. Department of Education's College Navigator, the White House's College Scorecard, college net price calculators, and the Financial Aid Shopping Sheet provide data to inform students, many questions are left unanswered—and many first-generation students are left on their own to try to navigate these tools.

Additionally, students are not the only consumers of postsecondary data. Leaders at the federal and state level need access to reliable, comparable information on colleges and universities and student pathways into and through college. Such data will allow them to make informed policy decisions about where to focus public funds and attention and how to assist postsecondary reform efforts. Evidence shows that colleges and universities can greatly improve student success through an intentional focus on the use of quality data.[xv] When data are disaggregated, they can be especially useful in identifying barriers to success for low-income, first-generation students, and once those barriers are identified faculty, staff, and institutional leadership can begin addressing them.

To promote the use and availability of better data, IHEP has offered a series of policy recommendations, both individually and in collaboration with organizational partners, which include:

- Disaggregating graduation rates for Pell Grant recipients to understand how well institutions are serving low-income students, many of whom are first-generation.[xvi]

- Improving the Integrated Postsecondary Education Data System (IPEDS) Outcome Measures to better capture completion and transfer outcomes for part-time and transfer students and disaggregate the data by student demographics.[xvii]

- Disaggregating cumulative debt data by completion status, instead of by combining completers and non-completers, which produces confusing results.[xviii]

- Creating a student unit record data system that incorporates protocols to protect student privacy and security. Such a system would provide the flexibility necessary to calculate measures and metrics to better inform decision-making.[xix]

- Making better use of administrative data systems within the Office of Federal Student Aid and linking to data held by other agencies, such as the Social Security Administration and Departments of Defense and Veterans Affairs.[xx]

Ultimately, a stronger data system will capture accurate, comprehensive, comparable, consistent, and secure data on college access, progression, completion, cost, and outcomes, disaggregated by key student demographics such as race/ethnicity and income.

2. Increase investment in the Pell Grant and simplify the financial aid process

College is becoming increasingly unaffordable for all students, especially those who are low-income or first-generation. Over the past 30 years, tuition has increased at nearly five times the rate of inflation, even faster than healthcare costs.[xxi] Given the populations that they serve, many MSIs try to hold tuition to levels that are relatively affordable. In 2012–13, for example, published tuition and fees were nearly twice as high at non-MSIs as they were at MSIs. Yet despite the lower price tag, students attending MSIs rely heavily on financial aid, including loans.[xxii] These realities highlight the need to target financial aid strategically, focusing our scarce resources on the students with the greatest need–low-income students–providing adequate levels of grant aid that will allow these students to successfully enroll in and complete college without considerable debt. To promote college access and success for low-income, first-generation students, Congress should maintain, and even *increase*, Pell Grant funding.

Alongside reducing prices for low-income students, we also must simplify the financial aid process so students and families can easily access the funds they need to cover college costs. This issue of financial aid simplification is deeper than debating the number of questions on the Free Application for Federal Student Aid (FAFSA). Rather, the entire financial aid process should evolve to meet the needs of the neediest students. We recommend three targeted simplifications that will ease students' interaction with the FAFSA:

- *Leverage Technology* – The FAFSA has evolved in recent years, allowing parents and students to electronically transfer their tax information into the form using the Internal Revenue Service (IRS) Data Retrieval Tool (DRT). This change has enabled applicants to skip up to 20 FAFSA questions.[xxiii] The electronic form also includes skip logic to reduce the need for students to answer questions that are irrelevant to their circumstances. The Department of Education should continue to use technology to streamline the application process where possible.

- *Use Prior-Prior Year (PPY) Income Data* – In order to take advantage of the DRT, students are required to submit tax data for a calendar year that has not yet ended or is barely over when college applications are typically due. Recent Department of Education data

show that over 4 million student aid applicants are unable to use the DRT because they apply for aid before they have filed their taxes.[xxiv] Using prior-prior year tax data, which are already in the IRS system would eliminate this problem and make the FAFSA completion process much easier for many students and families.[xxv]

- *Restore Auto-Zero EFC Income Threshold to $30,000* – In the Higher Education Opportunity Act of 2008, the income threshold for students to automatically qualify for a zero ($0) Expected Family Contribution (EFC) was set at $30,000.[xxvi] Budget cuts in 2012 reduced this income threshold to $23,000.[xxvii] It has since been raised to its current level of $24,000. Restoring this threshold to $30,000, however, will simplify the process for students who are very low-income and for whom little is gained by answering more questions on the FAFSA.

3. *Strengthen federal support for TRIO and GEAR UP programs to improve postsecondary education opportunities for low-income and first-generation college students.*

A key component to improving opportunities for low-income and first-generation students is the need to ensure that they are prepared to enter and succeed in postsecondary education. This means that we must strengthen federal support of assistance targeted to low-income individuals and first-generation college students as they progress through the academic pipeline from middle school to postsecondary graduation.

On the federal level, several college outreach, early intervention, and preparation programs focus on helping to prepare students for postsecondary education success. The GEAR UP program provides early intervention services to middle and high school students designed to increase college attendance and success and raise the expectations of low-income students. Not only does GEAR UP help to increase students college aspirations, it also prepares them academically and offers guidance for navigating the college process. Although it serves over 550,000 students, with a stronger investment, it could help many more.

Similarly, the Federal TRIO programs (TRIO)—including Upward Bound, Student Support Services (SSS), and Talent Search—provide a variety of outreach and student support services to individuals from disadvantaged backgrounds that have the goal of attending and graduating from postsecondary education. The SSS program, in particular, has an impact on college retention as evidenced by a recent study that showed SSS participants had a B.A. attainment rate of 38 percent, which was 24 percentage points higher than predicted if they had not received any supplemental services.[xxviii]

As the Subcommittee begins the HEA reauthorization process, there should be a continued commitment at the federal level to these programs as college outreach, early intervention, and preparation programs often can make the difference as to whether low-income and first-generation college students access, pursue, and complete postsecondary education.

4. *Set high expectations for Minority-Serving Institutions (MSIs) and support MSIs that serve students well.*

To support the role that MSIs play in helping low-income and first-generation college students enroll and complete postsecondary education, the federal government provides support for the HBCUs, TCUs, HSIs, AANAPISIs, and PBIs and should maintain this support during this HEA reauthorization. To enhance this support, federal policy should set high expectations for all institutions of higher education—including MSIs—just as it should encourage high expectations for all students. As such, federal funds should be accompanied by expectations for institutional performance and improvement to target dollars toward institutions that are enrolling underrepresented students *and* serving them well.

Furthermore, the Department of Education should expedite efforts to support MSIs' use of data for improvement purposes. The Department should update data reporting requirements for Title III and Title V grants and create data feedback tools that would help institutions understand their performance and how they can improve it. As mentioned earlier, thoughtful use of data by educators can help increase student success, so we should work to put the best tools in the hands of practitioners at the institutions serving the most disadvantaged students.

V. Conclusion

In closing, I would like to thank you again for providing this opportunity to offer guidance on strategies for supporting college access and completion for low-income and first generation college students. The recommendations outlined are important for helping students to meet personal and career goals, but also for meeting the nation's economic competiveness goals.

As you move forward to reauthorize HEA, please know that I, along with my team at IHEP, are happy to serve as a resource and partners in this effort. Working together we can better serve students. By crafting a system that helps students meet their degree attainment and workforce-readiness goals, federal postsecondary policy becomes better positioned to serve its intended role—to help ensure that all students have a real chance to receive a quality, affordable education that not only transforms their lives, but also strengthens the fabric of society.

Notes

[i] See Cunningham, A., Cooper, M. A., Leegwater, L., and Smith, E. (2012). *Supporting First-Generation College Students Through Classroom-Based Practices*. Washington, DC.: Institute for Higher Education Policy. Retrieved from: http://www.ihep.org/sites/default/files/uploads/docs/pubs/issue_brief_walmart_msi_supporting_fgs_september_2012.pdf

[ii] The term "first-generation student" may also be used to refer to students whose parents did not earn a degree.

[iii] U.S. Department of Education, National Center for Education Statistics. (2009). *National Postsecondary Student Aid Study. NPSAS: 08*. Data Analysis System. Retrieved from: https://nces.ed.gov/pubs2009/2009166.pdf

[iv] See Nunez, A., and Cuccaro-Alamin, S. (1998). *First-Generation Students: Undergraduates Whose Parents Never Enrolled in Higher Education. NCES 98–082*. U.S. Department of Education, National Center for Education Statistics. Washington, DC: U.S. Government Printing Office. Retrieved from: http://nces.ed.gov/pubs98/98082.pdf; Inman, W. E., and Mayes, L. (1999). *The Importance of Being First: Unique Characteristics of First-Generation Community College Students.* Community College Review 26, no. 4: 3–22. Retrieved from: http://www.sagepub.com/frankfort-nachmiasstudy5/articles/Chapter11inmanandmayes.pdf; and U.S. Department of Education, National Center for Education Statistics. (2009). *National Postsecondary Student Aid Study. NPSAS: 08*. Data Analysis System. Retrieved from: https://nces.ed.gov/pubs2009/2009166.pdf

[v] Nunez, A., and Cuccaro-Alamin, S. (1998) and U.S. Department of Education, National Center for Education Statistics. (2009); Choy, S. (2001). *Students Whose Parents Did Not Go to College: Postsecondary Access, Persistence, and Attainment*, *NCES 2001–126*. Washington, DC: U.S. Department of Education, National Center for Education Statistics. Retrieved from: http://nces.ed.gov/pubs2001/2001072_Essay.pdf; U.S. Department of Education, National Center for Education Statistics. (2009); and Tym, C., McMillion, R., Barone, S. and Webster, J. (2004). F*irst-Generation College Students: A Literature Review*. Austin, TX: TG Research and Analytical Services. Retrieved from: https://www.tgslc.org/pdf/first_generation.pdf.

[vi] Among students beginning college in 2003–04, 15 percent of first-generation students earned a bachelor's degree after six years, compared to 45 percent of students whose parent(s) had a bachelor's degree; U.S. Department of Education, National Center for Education Statistics. (2009). Beginning Postsecondary Students (BPS:04/09). Powerstats.

[vii] See Cunningham, A., Park, E., and Engle, J. (2014). *Minority-Serving Institutions: Doing More with Less*. Washington, DC: Institute for Higher Education Policy. Retrieved from: http://www.ihep.org/sites/default/files/uploads/docs/pubs/msis_doing_more_w-less_final_february_2014-v2.pdf

[viii] Harmon, N. (2012). *The Role of Minority-Serving Institutions in National College Completion Goals*. Washington, DC: Institute for Higher Education Policy. Retrieved from: http://www.ihep.org/sites/default/files/uploads/docs/pubs/the_role_of_msis_final_january_20121.pdf

[ix] Unless cited otherwise, data in this section come from IPEDS surveys in the 2011–12 academic year, the most recently available data at the time of analysis. For this section, we included 4,544 degree-granting, undergraduate-serving institutions (public, private, and for-profit), including 634 MSIs and 3,910 non-MSIs. AANAPISIs are excluded from the definition of MSIs for this analysis and are included as non-MSIs. Also, some MSIs have more than one designation (e.g., HSI and PBI). These institutions are unduplicated in analyses that aggregate MSIs, but are duplicated in analyses that disaggregate by MSI type.

[x] Based on 12-month unduplicated enrollment, in degree-granting, undergraduate-serving institutions.

[xi] Bustillos, L.T. (2012). *Rethinking Remedial Education: The Role of MSIs in Serving Under-Prepared Students in the 21st Century*. Washington, DC: Institute for Higher Education Policy. Retrieved from: http://www.ihep.org/sites/default/files/uploads/docs/pubs/remedial_education_lumina_msis_final_november_2012.pdf

[xii] Using the bachelor's or equivalent sub-cohort (four-year institutions) and completers of bachelor's or equivalent degrees within 150 percent of normal time.

[xiii] Using degree/certificate-seeking students (two-year institutions) and completions within 150 percent of normal time.

[xiv] See Cooper, M., Leegwater, L., and Smith, E (2012). *Supporting First-Generation College Students Through Classroom-Based Practices*. Washington, DC: Institute for Higher Education Policy, Retrieved from: http://www.ihep.org/sites/default/files/uploads/docs/pubs/issue_brief_walmart_msi_supporting_fgs_september_2012.pdf

[xv] Yeado, J., Haycock, K., Johnstone, R., and Chaplot, P. (2014). *Learning from High-Performing and Fast-Gaining Institutions*. Washington, DC: The Education Trust. Retrieved from: http://1k9gl1yevnfp2lpq1dhrqe17.wpengine.netdna-cdn.com/wp-content/uploads/2013/10/PracticeGuide1.pdf.

[xvi] PostsecData Collaborative (2014). *Postsecondary Data Collaborative comments on IPEDS Outcome Measures*, Retrieved from: http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/data-at-work/postsecdata_comments_on_ipeds_outcome_measures_trp_dec_2014.pdf; Voight, M., Long, A., Huelsman, M., and Engle, J. (2014). *Mapping the Postsecondary Data Domain: Problems and Possibilities*. Washington, DC: Institute for Higher Education Policy. Retrieved from: http://www.ihep.org/assets/files/publications/M-R/mapping_postsecondary_data_part_1_final_march_2014-v2.pdf

[xvii] PostsecData Collaborative (2014). *Postsecondary Data Collaborative Comments on IPEDS Outcome Measures*, Retrieved from: http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/data-at-work/postsecdata_comments_on_ipeds_outcome_measures_trp_dec_2014.pdf.

[xviii] Voight, M., Long, A., Huelsman, M., and Engle, J. (2014). *Mapping the Postsecondary Data Domain: Problems and Possibilities*. Washington, DC: Institute for Higher Education Policy. Retrieved from: http://www.ihep.org/assets/files/publications/M-R/mapping_postsecondary_data_part_1_final_march_2014-v2.pdf; PostsecData Collaborative (2015). *Postsecondary Data Collaborative Comments on College Ratings System*, Retrieved from: http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/data-at-work/postsecondary_data_collaborative_-_college_ratings_comments.pdf; PostsecData Collaborative (2014). *Postsecondary Data Collaborative Comments on Pay As You Earn Negotiated Rulemaking Agenda.* Retrieved from: http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/ihep_paye_negotiated_rulemaking_comments_-_final.pdf.

[xix] PostsecData Collaborative (2015). *Postsecondary Data Collaborative Letter in Response to Senate HELP Committee White Paper on Consumer Information*, Retrieved from: http://www.ihep.org/sites/default/files/uploads/postsecdata/docs/resources/postsecdata_collaborative_help_response.pdf.

[xx] Ibid.

[xxi] Reimherr, P., Harmon, T., Strawn, J., & Choitz, V. (2013). *Reforming Student Aid: How to Simplify Tax Aid and Use Performance Metrics to Improve College Choices and Completion*. Retrieved from: http://www.clasp.org/documents/Final-RADD-WhitePaper-Feb-2013.pdf

[xxii] Alisa F. Cunningham, Eunkyoung Park, and Jennifer Engle (2014). *Minority-Serving Institutions: Doing More with Less.* Washington, D.C.: The Institute for Higher Education Policy. Retrieved from: http://www.ihep.org/sites/default/files/uploads/docs/pubs/msis_doing_more_w-less_final_february_2014-v2.pdf

[xxiii] The Institute for College Access and Success (2014). *The Institute for College Access and Success Letter to President Barack Obama Regarding Use of Prior Prior Year Income Data*. Retrieved from: http://ticas.org/sites/default/files/pub_files/PPY_coalition_letter.pdf.

[xxiv] Ibid.

[xxv] Ibid.

[xxvi] Dependent students and independent students with dependents other than a spouse are eligible for the auto-zero EFC, but independent students without dependents are not eligible.

[xxvii] Federal Student Aid (2012). *2012-2013 Expected Family Contribution (EFC) Formula Guide*. Retrieved from: http://www.ifap.ed.gov/efcformulaguide/010512EFCFormulaGuide1213.html.

[xxviii] Bradford W. Chaney, B.W. (2010). *National Evaluation of Student Support Services: Examination of Student Outcomes After Six Years*. Westat for U.S. Department of Education, Office of Planning, Evaluation and Policy Development, Policy and Program Studies Service, Apr. 2010. Retrieved from: http://www2.ed.gov/rschstat/eval/highered/student-support/final-report.pdf .