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Comments Received:

We suggest that the revised FAQs on "non-first-time" cohorts, revised for 2024-25 in response to TRP #69, be implemented for enrolling students who would first be reported on Fall Enrollment (EF) Fall 2024 and 12-month Enrollment (E12) for 2024-25 data collection. We further suggest that it not be required for Outcomes Measures until the 24-25AY student cohort be reported on OM, which should be the 2032-33 reporting year. Our rationale is that EF and E12 cohorts have been reported historically and if OM for 2024-25 requires recreation of these albeit small groups of students who transition from non-degree-seeking to degree-seeking, cohorts may no longer be 1:1 replication of previously reported student enrollment headcounts. In addition, the unique nature of these students would place an extensive burden on the reporting office in order to align the previously reported data to the new reporting standard.